

OHIO STATE MEDICAL BOARD

FEB 14 2000

STATE OF OHIO
THE STATE MEDICAL BOARD
VOLUNTARY RETIREMENT FROM THE
PRACTICE OF MEDICINE AND SURGERY

I, MARY BETH WILLIAMS, M.D., do hereby voluntarily, knowingly, and intelligently retire from the practice of medicine and surgery, effective upon last date of signature below.

I, MARY BETH WILLIAMS, M.D., do hereby voluntarily, knowingly and intelligently surrender my renewal card in connection with my certificate to practice medicine and surgery, No.35-045264, to the State Medical Board of Ohio.

I understand that as a result of the surrender herein that I am no longer permitted to practice medicine and surgery in any form or manner in the State of Ohio.

I, MARY BETH WILLIAMS, M.D., hereby release the State Medical Board of Ohio, its members, employees, agents and officers, jointly and severally, from any and all liability arising from the within matter.

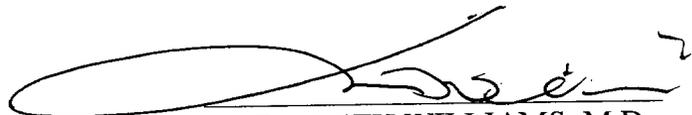
This document shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code.

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

I stipulate and agree that I am taking the action described herein because I am currently unable to practice according to acceptable and prevailing standards of care by reason of physical illness adversely affecting my cognitive skills.

Signed this 2/9/2000 day of _____, 2000.

Christine E. Dooley
Witness


MARY BETH WILLIAMS, M.D.

Carla Martins
Witness

OHIO STATE MEDICAL BOARD
FEB 14 2000

Sworn to and subscribed before me this day of February, 9, 2000.



CHRISTINE E. DOOLEY
Notary Public, State of Ohio
My Commission Expires Nov. 25, 2001

Christine E. Dooley
Notary Public

SEAL

(This form must be either witnessed OR notarized)

Accepted by the State Medical Board of Ohio:

Anand G. Garg
Anand G. Garg, M.D.
Secretary

Raymond J. Albert
Raymond J. Albert
Supervising Member

03/06/2000
Date

4/4/00
Date



STATE MEDICAL BOARD OF OHIO

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

June 18, 1993

Mary Beth Williams, M.D.
327 Vienna Avenue
Tiffany Square #1
Niles, Ohio 44446

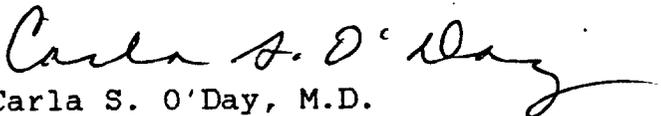
Dear Doctor Williams:

Please find enclosed certified copies of the Entry of Order; the Report and Recommendation of Wanita J. Sage, Attorney Hearing Examiner, State Medical Board of Ohio; and an excerpt of the Minutes of the State Medical Board, meeting in regular session on June 16, 1993, including a Motion approving and confirming the Report and Recommendation as the Findings and Order of the State Medical Board of Ohio.

Section 119.12, Ohio Revised Code, may authorize an appeal from this Order. Such an appeal may be taken to the Franklin County Court of Common Pleas only.

Such an appeal setting forth the Order appealed from and the grounds of the appeal must be commenced by the filing of a Notice of Appeal with the State Medical Board of Ohio and the Franklin County Court of Common Pleas within fifteen (15) days after the mailing of this notice and in accordance with the requirements of Section 119.12 of the Ohio Revised Code.

THE STATE MEDICAL BOARD OF OHIO


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

CSO:em

Enclosures

CERTIFIED MAIL RECEIPT NO. P 741 123 931
RETURN RECEIPT REQUESTED

cc: Christopher J. Shaker, Esq.

CERTIFIED MAIL RECEIPT NO. P 741 123 932
RETURN RECEIPT REQUESTED

Mailed 6/18/93



STATE MEDICAL BOARD OF OHIO

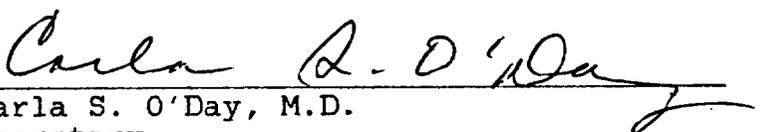
77 South High Street, 17th Floor • Columbus, Ohio 43266-0315 • (614) 466-3934

CERTIFICATION

I hereby certify that the attached copy of the Entry of Order of the State Medical Board of Ohio; attached copy of the Report and Recommendation of Wanita J. Sage, Attorney Hearing Examiner, State Medical Board; and an excerpt of Minutes of the State Medical Board, meeting in regular session on June 16, 1993, including a Motion approving and confirming the Report and Recommendation as the Findings and Order of the State Medical Board of Ohio, constitute a true and complete copy of the Findings and Order of the State Medical Board in the matter of Mary Beth Williams, M.D., as it appears in the Journal of the State Medical Board of Ohio.

This certification is made by authority of the State Medical Board of Ohio and in its behalf.

(SEAL)


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

6/17/93
Date



STATE MEDICAL BOARD OF OHIO

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

BEFORE THE STATE MEDICAL BOARD OF OHIO

IN THE MATTER OF

★

★

MARY BETH WILLIAMS, M.D.

★

ENTRY OF ORDER

This matter came on for consideration before the State Medical Board of Ohio on the 16th day of June, 1993.

Upon the Report and Recommendation of Wanita J. Sage, Hearing Examiner, Medical Board, in this matter designated pursuant to R.C. 4731.23, a true copy of which Report and Recommendation is attached hereto and incorporated herein, and upon the approval and confirmation by vote of the Board on the above date, the following Order is hereby entered on the Journal of the State Medical Board of Ohio for the above date.

It is hereby ORDERED that:

1. The certificate of Mary Beth Williams, M.D., to practice medicine and surgery in the State of Ohio shall be permanently REVOKED. Such revocation is STAYED, and Dr. Williams' certificate is hereby SUSPENDED for a period of fifteen (15) days.
2. Upon reinstatement, Dr. Williams' certificate shall be subject to the following PROBATIONARY terms, conditions, and limitations for a period of at least two (2) years:
 - a. Dr. Williams shall obey all federal, state, and local laws, and all rules governing the practice of medicine in Ohio.
 - b. Dr. Williams shall submit quarterly declarations under penalty of perjury stating whether or not there has been compliance with all the provisions of probation.
 - c. Dr. Williams shall appear in person for interviews before the full Board or its designated representative at three (3) month intervals, or as otherwise requested by the Board.



STATE MEDICAL BOARD OF OHIO

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

Page 2

Mary Beth Williams, M.D.

- d. In the event that Dr. Williams should leave Ohio for three (3) consecutive months, or reside or practice outside the State, Dr. Williams must notify the State Medical Board in writing of the dates of departure and return. Periods of times spent outside of 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. Dr. Williams shall not purchase, prescribe, order, dispense, administer, or possess (except as provided in paragraph 2.g., below) any controlled substances, and shall be ineligible to reapply for or to hold registration with the United States Drug Enforcement Administration, without prior Board approval.
- f. Upon reinstatement of Dr. Williams' controlled substance privileges pursuant to Board approval, Dr. Williams shall keep a log of all controlled substances purchased, prescribed, dispensed, or administered. Such log shall be submitted in the format approved by the Board thirty (30) days prior to Dr. Williams' personal appearance before the Board or its designated representative, or as otherwise directed by the Board. Further, Dr. Williams shall make her patient records with regard to such prescribing or dispensing available for review by an agent of the State Medical Board upon request.
- g. Dr. Williams shall abstain completely from the personal use or possession of drugs, except as prescribed, administered, or dispensed to her by another so authorized by law who has full knowledge of Dr. Williams' history of chemical dependency.
- h. Dr. Williams shall abstain completely from the use of alcohol.
- i. Dr. Williams shall submit to random urine screenings for drugs and alcohol on a weekly basis, or as otherwise directed by the Board. Dr. Williams shall ensure that all screening reports are forwarded directly to the Board on a monthly basis. Within thirty (30) days of the effective date of the reinstatement of her certificate, Dr. Williams shall submit to the Board for its prior approval the name of a supervising physician to whom she shall submit the required urine specimens.



STATE MEDICAL BOARD OF OHIO

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

Page 3

Mary Beth Williams, M.D.

The supervising physician shall ensure that the urine specimens are obtained on a random basis, that the giving of the specimen is witnessed by a reliable person, and that appropriate control over the specimen is maintained. In addition, the supervising physician shall immediately inform the Board of any positive screening results. Further, the supervising physician shall monitor Dr. Williams and provide the Board with reports on Dr. Williams' progress and status. In the event that the designated supervising physician becomes unable or unwilling to so serve, Dr. Williams must immediately notify the Board in writing, and make arrangements acceptable to the Board for another supervising physician as soon as practicable.

- j. Dr. Williams shall submit blood or urine specimens for analysis without prior notice at such times as the Board may request.
 - k. Dr. Williams shall maintain participation in an alcohol and drug rehabilitation program, such as AA, NA, or Caduceus, approved in advance by the Board specifically for Dr. Williams, no less than four (4) times per week, or as otherwise directed by the Board. At her appearances before the Board or its designated representative, Dr. Williams shall submit acceptable documentary evidence of continuing compliance with this program.
 - l. Dr. Williams shall continue counseling with a psychiatrist or other counselor approved by the Board, at such intervals as are deemed appropriate by the counselor or treating psychiatrist, but not less than once per month, until such time as the Board determines that no further treatment is necessary. To make this determination, the Board shall require quarterly reports from the counselor or approved treating psychiatrist. Dr. Williams shall ensure that these reports are forwarded to the Board on a quarterly basis, or as otherwise directed by the Board.
 - m. Dr. Williams shall provide a copy of this Order to all employers and the Chief of Staff at each hospital where she has, applies for, or obtains privileges.
3. If Dr. Williams violates probation in any respect, the Board, after giving Dr. Williams notice and the opportunity to be heard, may set aside the stay order and impose the revocation of Dr. Williams' certificate.



STATE MEDICAL BOARD OF OHIO

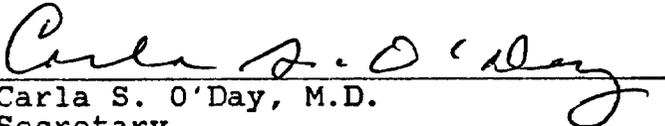
77 South High Street, 17th Floor • Columbus, Ohio 43266-0315 • (614) 466-3934

Page 4

Mary Beth Williams, M.D.

4. Upon successful completion of probation, as evidenced by a written release from the Board, Dr. Williams' certificate will be fully restored.

This Order shall become effective thirty (30) days from the date of mailing of notification of approval by the State Medical Board of Ohio, except that Dr. Williams shall immediately withdraw her pending application for registration with the United States Drug Enforcement Administration. In the thirty (30) day interim, Dr. Williams shall not undertake the care of any patient not already under her care.


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

(SEAL)

6/17/93

Date

93 MAY -7 PM 2:14

REPORT AND RECOMMENDATION
IN THE MATTER OF MARY BETH WILLIAMS, M.D.

The Matter of Mary Beth Williams, M.D., came on for hearing before me, Wanita J. Sage, Esq., Hearing Examiner for the State Medical Board of Ohio, on April 8, 1993.

INTRODUCTION AND SUMMARY OF EVIDENCE

I. Basis for Hearing

- A. By letter of January 13, 1993 (State's Exhibit #1), the State Medical Board notified Mary Beth Williams, M.D., that it proposed to take disciplinary action against her certificate to practice medicine and surgery in Ohio. The Board alleged that, on or about January 24, 1992, Dr. Williams entered into a Consent Agreement with the State Medical Board, based upon a lengthy history of chemical dependency with numerous overdoses, and that she subsequently violated several provisions of this Consent Agreement. Dr. Williams allegedly violated Clause 8 of her Consent Agreement by taking Darvocet-N 100 in 1992 on at least three occasions for which that medication had not been prescribed, administered, or dispensed to her by another so authorized by law who had full knowledge of her history of chemical dependency. Further, Dr. Williams allegedly violated Clause 10 of her Consent Agreement by submitting during May and July, 1992, only two urine screens per month, rather than the required weekly random urine screens. In addition, Dr. Williams allegedly violated Clause 13 of her Consent Agreement. That clause originally required her to undergo psychiatric treatment three times per week, or as otherwise directed by the Board. In November, 1991, Dr. Williams appeared before the Board to request modification of that requirement, pursuant to a recommendation by her approved psychologist that she discontinue her meetings with him but continue to see Marilyn S. King, MSN, RNCS, on a weekly basis. Dr. Williams' request was approved by the Board. However, after November 6, 1991, Dr. Williams saw Ms. King only on a bi-weekly basis without Board approval. Such acts, conduct, and/or omissions were alleged to constitute "violation of the conditions of limitation placed by the Board upon a certificate to practice or violation of the conditions of limitation upon which a limited or temporary registration or certificate to practice is issued", as that clause is used in Section 4731.22(B)(15), Ohio Revised Code. Dr. Williams was advised of her right to request a hearing in this Matter.

Although the Board's letter of January 13, 1993, also alleged that Dr. Williams had violated Section 4731.22(B)(10), Ohio Revised Code, to wit: Section 2921.11, Ohio Revised Code, "Perjury", the State at hearing verbally amended the Board's letter to delete this allegation and the related factual allegations set forth in numbered paragraph (5) of the Board's letter.

- B. By letter received by the State Medical Board on January 22, 1993 (State's Exhibit #2), Christopher J. Shaker, Esq., requested a hearing on behalf of Dr. Williams.

II. Appearances

- A. On behalf of the State of Ohio: Lee I. Fisher, Attorney General, by Susan C. Walker, Assistant Attorney General
- B. On behalf of the Respondent: Christopher J. Shaker, Esq.

III. Testimony Heard

- A. Presented by the State
Mary Beth Williams, M.D., as on cross-examination
- B. Presented by the Respondent
Mary Beth Williams, M.D.

IV. Exhibits Examined

In addition to State's Exhibits #1 and #2, noted above, the following exhibits were identified and admitted into evidence in this Matter:

- A. Presented by the State
 1. State's Exhibit #3: January 26, 1993, letter to Christopher J. Shaker, Esq., from the State Medical Board, advising that a hearing initially set for February 5, 1993, was postponed pursuant to Section 119.09, Ohio Revised Code.
 2. State's Exhibit #4: February 1, 1993, letter to Attorney Shaker from the State Medical Board, scheduling the hearing for April 8, 1993.

93 MAY -7 PM 2:14

3. State's Exhibit #5: January 24, 1991, Consent Agreement between Mary Beth Williams, M.D., and the State Medical Board of Ohio.
4. State's Exhibit #6: October 15, 1991, letter to the State Medical Board from Thomas D. Kraft, Ph.D., recommending that Dr. Williams terminate treatment with his office, continue attending AA and NA meetings at least twice weekly, continue on a weekly basis with her regular therapist, Marilyn King, and continue to see Dr. Walton monthly for purposes of medication; excerpt from minutes of the November 13, 1991, meeting of the State Medical Board regarding Dr. Williams' appearance pursuant to her request for modification of her Consent Agreement; and November 25, 1991, letter to Dr. Williams from the State Medical Board, advising of the Board's decision with regard to Dr. Williams' request for modification of her Consent Agreement.
5. State's Exhibit #7: Reports of urine screens run on specimens submitted by Dr. Williams on February 7, February 25, and June 30, 1992.
6. State's Exhibit #8: July 22, 1992, letter to the State Medical Board from Christopher J. Shaker, Esq., enclosing a July 21, 1992, letter from Robert G. Spratt, M.D., and copies of drug screen reports regarding all specimens submitted by Dr. Williams from March 27 through June 30, 1992.
7. State's Exhibit #9: October 28, 1992, letter to the State Medical Board from Attorney Shaker, enclosing an October 6, 1992, letter from Dr. Spratt and drug screen reports regarding all urine specimens submitted by Dr. Williams from July 11 through September 25, 1992.
8. State's Exhibit #10: Reports dated January 15, April 15, July 7, and October 9, 1992, from Marilyn S. King regarding her counseling sessions with Dr. Williams.
9. State's Exhibit #11: Transcript of a December 18, 1992, investigatory deposition of Dr. Williams, accompanied by the following exhibits:
 - a. State's Depo Exhibit #1 (duplicate of State's Exhibit #5): Consent Agreement between Dr. Williams and the State Medical Board.

93 MAY -7 PM 2:14

- b. State's Depo Exhibit #2 (duplicate of State's Exhibit #6): October 15, 1991, letter to the State Medical Board from Thomas D. Kraft, Ph.D.; excerpt from minutes of the November 13, 1991, meeting of the State Medical Board; and November 25, 1991, letter to Dr. Williams from the State Medical Board.
- c. State's Depo Exhibit #3: (duplicate of State's Exhibit #10): Reports dated January 15, April 15, July 7, and October 9, 1992, from Marilyn S. King.
- d. State's Depo Exhibit #4: April 7, 1992, letter to Christopher J. Shaker, Esq., from Robert G. Spratt, M.D., with regard to reports of drug screens for Dr. Williams during the period from January 7, 1992, through April 7, 1992; July 21, 1992, letter to Attorney Shaker from Dr. Spratt with regard to recent drug screen reports for Dr. Williams.

B. Presented by the Respondent

1. Respondent's Exhibit A: March 30, 1993, letter to Attorney Shaker from Thomas D. Kraft, Ph.D., regarding Dr. Kraft's discussions with Dr. Williams in March and April, 1992, and his opinion with regard to her use of Darvocet.
2. Respondent's Exhibit B: March 16, 1993, letter in support of Dr. Williams from Craig H. Neuman, Executive Director, Trumbull County Children Services Board.
3. Respondent's Exhibit C: January 21, 1993, report from Marilyn S. King regarding her counseling sessions with Dr. Williams.

FINDINGS OF FACT

1. On or about January 24, 1991, Mary Beth Williams, M.D., entered into a Consent Agreement with the State Medical Board, based upon a history of chemical dependency, with three hospitalizations between April, 1988 and February, 1989 as a result of drug overdoses.

These facts are established by State's Exhibit #5 and the testimony of Dr. Williams (Tr. at 17-18).

2. Dr. Williams' January, 1991, Consent Agreement imposed probationary terms, conditions, and limitations upon her certificate to practice medicine and surgery, for a minimum of two years. Clause 8 of this

STATE MEDICAL BOARD

93 MAY -7 PM 2:14

Consent Agreement states: "DOCTOR WILLIAMS shall abstain completely from the personal use or possession of drugs, except those prescribed, administered, or dispensed to her by another so authorized by law who has full knowledge of DOCTOR WILLIAMS' history of chemical dependency".

These facts are established by State's Exhibit #5.

3. On February 6, February 25, and June 30, 1992, Dr. Williams submitted urine specimens for drug screenings required by her Consent Agreement. All three of these specimens tested positive for propoxyphene. On or about September 1, 1992, when a State Medical Board investigator contacted Dr. Williams about these positive urine screens, Dr. Williams told the investigator that she had inadvertently consumed some of her daughter's cough medicine (Hycomine, a Schedule III narcotic antitussive containing hydrocodone). At the time of the investigator's visit, Dr. Williams was not aware that propoxyphene was the substance for which her urine specimens had tested positive. At a deposition taken on December 18, 1992, Dr. Williams stated that she had simply not thought to mention to the investigator that, on three separate occasions, she had sustained injuries for which she had self-administered Darvocet-N 100 (a Schedule IV narcotic analgesic containing propoxyphene).

With regard to her admitted possession and self-administration of Darvocet, Dr. Williams testified that she had broken her arm at the elbow (head of the radius) in November, 1991. Dr. Joseph Burns had treated her injury at that time. Dr. Burns, who was then Chief of Staff at Trumbull Memorial Hospital, had known of Dr. Williams' history of chemical dependency. According to Dr. Williams, Dr. Burns had initially dispensed eight Darvocet-N 100 to her for relief of pain associated with the fracture. After taking only one of the Darvocet, Dr. Williams had told Dr. Burns that it didn't help. He had then written a prescription for Vicodin, a Schedule III narcotic analgesic, for her. Dr. Williams had taken the Vicodin for a few days, and had kept the seven unused Darvocet. Dr. Williams claimed that she had discussed her possession of this Darvocet with Dr. Robert Spratt, her supervising physician, sometime in November or December, 1991, and that Dr. Spratt had indicated that he saw no harm in her keeping the Darvocet to use if she needed something in the middle of the night for minor injuries, as long as she let him know about such incidents.

Dr. Williams testified that she, thereafter, took one Darvocet in February, 1992, when she reinjured her elbow. Later in February, 1992, she took two more Darvocet when she tripped over the dog and strained her neck. In June, 1992, she again took two Darvocet when she slipped on the steps and twisted her neck. Dr. Williams stated

93 MAY -7 PM 2:14

that she threw away the remaining Darvocet after the September 1, 1992, visit from the State Medical Board investigator.

Dr. Williams claimed that she had seen Dr. Burns the day after she had reinjured her elbow in February, 1992, and had informed him of her Darvocet use on that occasion, though she had not made him aware of her use of Darvocet on the two subsequent occasions. She further claimed that she had informed Dr. Spratt of her Darvocet use on the day following all three instances.

These facts are established by State's Exhibit #7, and the testimony of Dr. Williams (State's Exhibit #11 at 13-28 and Tr. at 18-25, 31-33, 39-41).

4. While Dr. Williams' testimony implied that she had informed Dr. Spratt of her Darvocet use before submitting the urine specimens on February 6, February 25, and June 30, 1992, Dr. Spratt's communications indicated that he was unaware that the February 6 and February 25 specimens had tested positive for propoxyphene. Dr. Spratt never informed Dr. Williams that these urine screens had been positive. Further, by letter dated April 7, 1992, Dr. Spratt informed Dr. Williams' attorney that all of Dr. Williams' drug screens for the period from January 7, 1992, through April 7, 1992, had tested negative for various substances, including propoxyphene, even though the drug screen reports sent with this letter included the two February screens showing positive for propoxyphene.

Under cover of a letter dated July 21, 1992, Dr. Spratt sent Dr. Williams' attorney other drug screen reports, including the one showing that Dr. Williams' June 30, 1992, urine specimen had also tested positive for propoxyphene. This letter stated, "Recent use of Darvocet has been discussed and discouraged with Dr. Williams because of her gravid state."

These facts are established by the testimony of Dr. Williams (State's Exhibit #11 at 13-14) and State's Depo Exhibit #4.

5. Clause 10 of Dr. Williams' Consent Agreement states:
"DOCTOR WILLIAMS shall submit to random urine screenings for drugs on a weekly basis or as otherwise directed by the BOARD. DOCTOR WILLIAMS is to ensure that all screening reports are forwarded directly to the BOARD on a quarterly basis; *** DOCTOR WILLIAMS shall submit the required urine specimens to a supervising physician to be approved by the BOARD. The supervising physician shall ensure that the urine specimens are obtained on a random basis, that the giving of the specimen is witnessed by a reliable person, and that appropriate control over the specimen is maintained. In addition, the supervising physician shall

93 MAY -7 PM 2:14

immediately inform the BOARD of any positive screening results. *** The supervising physician shall monitor DOCTOR WILLIAMS and provide the BOARD with reports on the doctor's progress and status. *** In the event that the designated supervising physician becomes unable or unwilling to so serve, DOCTOR WILLIAMS must immediately notify the BOARD in writing, and make arrangements acceptable to the BOARD for another supervising physician as soon as practicable".

This fact is established by State's Exhibit #5.

6. Dr. Williams admittedly failed to submit to random urine screenings for drugs on a weekly basis during May and July, 1992. During May, 1992, she submitted urine specimens on Thursday, May 7, and Thursday, May 28; no specimens were submitted for the weeks of May 10 through May 16 and/or May 17 through May 23, 1992. During July, 1992, Dr. Williams submitted urine specimens on Saturday, July 11, and Saturday, July 25; no urine specimens were submitted for the weeks of July 12 through July 18, 1992, and/or July 26 through July 31, 1992.

Dr. Williams testified that she had submitted urine specimens whenever Dr. Spratt, her supervising physician, had called. Because her Consent Agreement required random urine screenings, she had felt it necessary to wait for Dr. Spratt's call, rather than deciding herself when the screens should be done. Dr. Spratt had apparently forgotten to call her on a weekly basis during the months in question. Dr. Williams indicated that she had since discussed this problem with Dr. Spratt. She believed that he was now aware of his responsibilities and how they affected her. She has experienced no recent problems with Dr. Spratt's forgetting to call her for weekly urine screens.

These facts are established by State's Exhibits #8 and #9 and the testimony of Dr. Williams (Tr. at 25-26, 33-34, 41-42).

7. Clause 13 of Dr. Williams' Consent Agreement originally required that she "undergo and continue psychiatric treatment three (3) times per week, or as otherwise directed by the Board." On or about October 15, 1991, Thomas D. Kraft, Ph.D., Dr. Williams' approved treating psychologist, submitted a letter to the State Medical Board, recommending that this requirement be terminated. Dr. Kraft further recommended that Dr. Williams continue therapy "on a weekly basis" with Marilyn S. King, MSN, RNCS, and that she continue to see Dr. Walton monthly for purposes of medication. On November 13, 1991, Dr. Williams appeared before the State Medical Board, requesting that her Consent Agreement be modified to permit her to discontinue her meetings with Dr. Kraft, while continuing to see her primary therapist, Marilyn King. At that time, the Board noted that it had been receiving reports from Dr. Kraft, but not

93 MAY -7 PM 2:14

from Ms. King or Dr. Walton. The Board granted Dr. Williams' request to release her from the required meetings with Dr. Kraft, contingent upon the willingness of Dr. Walton and Ms. King to submit quarterly reports to the Board on Dr. Williams' progress. The Board notified Dr. Williams of its approval of her request by letter dated November 25, 1991. Neither this letter nor the minutes of the Board's meeting of November 13, 1991, indicated that any requirement as to the frequency of Dr. Williams' meetings with Ms. King was discussed or specified.

Since November 6, 1991, Dr. Williams has seen Marilyn King for hour-long counseling sessions only once every other week. Dr. Williams testified that she had changed from weekly to bi-weekly sessions at the recommendation of Ms. King. She stated that she had not sought Board approval for such change because she had not believed that the number of her sessions with Ms. King had been mandated by the Board.

These facts are established by State's Exhibits #6 and #10, Respondent's Exhibit C, and the testimony of Dr. Williams (State's Exhibit #11 at 7-12 and Tr. at 26-28, 34-35, 40-41).

8. Dr. Williams does not currently see Dr. Walton for medications. Her medications were discontinued during her pregnancy in 1992, and were not reinstated after the baby's birth in October, 1992.

These facts are established by the testimony of Dr. Williams (State's Exhibit #11 at 7-10, 12).

9. Despite her unauthorized self-administration of Darvocet on at least three occasions in 1992, the evidence indicated that Dr. Williams has maintained her recovery since February, 1989.

This fact is established by State's Exhibits #6 and #10, Respondent's Exhibits A and C, and the testimony of Dr. Williams (Tr. at 18, 28, 31, 37-39).

CONCLUSIONS

1. The acts, conduct, and/or omissions of Mary Beth Williams, M.D., with regard to her possession and self-administration of Darvocet on three occasions in February and June, 1992, as set forth in Findings of Fact #1 through #4, above, constitute "violation of the conditions of limitation placed by the Board upon a certificate to practice or violation of the conditions of limitation upon which a limited or temporary registration or certificate to practice is issued", as that clause is used in Section 4731.22(B)(15), Ohio Revised Code.

STATE MEDICAL BOARD

93 MAY -7 PM 2:14

Apparently, Dr. Williams' initial use and possession of Darvocet in November, 1991, was in compliance with Clause 8 of her Consent Agreement. At that time, Dr. Burns, who had full knowledge of Dr. Williams' history of chemical dependency, dispensed Darvocet to her for relief of pain associated with her fractured radius. Dr. Burns was clearly "so authorized by law" to dispense Darvocet as part of his fracture care. Dr. Burns was not, however, authorized by law to dispense Darvocet for Dr. Williams' personal use for possible future injuries or for any other condition which he did not treat. Dr. Williams did not use all of the Darvocet dispensed by Dr. Burns for her November, 1991, injury. She retained possession of seven of the eight Darvocet for possible future use at her own discretion. In fact, she admittedly self-administered at least five of these Darvocets on later occasions for which Dr. Burns had not prescribed or dispensed them. Such conduct violates both the spirit and the letter of Clause 8 of Dr. Williams' Consent Agreement.

Dr. Williams' contention that such possession and personal use of Darvocet was authorized by her supervising physician is not well taken. Dr. Williams' conduct was proscribed by her Consent Agreement with the State Medical Board. Her supervising physician cannot excuse her from compliance or modify the terms of her Consent Agreement with the Board. Moreover, the fact that her supervising physician was unaware of the two positive drug screens for February, casts doubt upon Dr. Williams' claim that she always told him about her Darvocet use the next day.

2. The acts, conduct, and/or omissions of Dr. Williams with regard to her failure to submit to weekly random urine screenings in May and July, 1992, as set forth in Findings of Fact #5 and #6, above, also constitute violation of Section 4731.22(B)(15), Ohio Revised Code.

Regardless of the conduct of third parties, Dr. Williams is responsible for ensuring compliance with Clause 10 of her Consent Agreement. That Clause is specific as to what Dr. Williams should do in the event that her supervising physician becomes unwilling or unable to supervise her urine screens. Although Dr. Williams knew or should have known that she was not submitting the required number of urine screens during May and July, 1992; there is no evidence that she either took timely measures to straighten the situation out with Dr. Spratt or notified the Board and made acceptable arrangements for another physician to supervise her screens. However regrettable, any negligence on the part of her supervising physician does not excuse Dr. Williams' lack of compliance with Clause 10 of her Consent Agreement.

3. The evidence presented is insufficient to support a conclusion that Dr. Williams' conduct with regard to reducing the number of her sessions with Ms. King, as set forth in Finding of Fact #7, above,

STATE MEDICAL BOARD

93 MAY -7 PM 2:14

constitutes violation of Section 4731.22(B)(15), Ohio Revised Code. As recommended by Dr. Williams' approved treating psychologist, the Board at its meeting of November 13, 1991, relieved Dr. Williams of the requirements of Clause 13 of her Consent Agreement. Although her psychologist had also recommended that Dr. Williams continue to see Ms. King on a weekly basis, there is no evidence that the Board discussed or imposed any requirement with regard to the number of Dr. Williams' sessions with Ms. King. The Board's motion specified that Ms. King was to submit quarterly reports to the Board on Dr. Williams' progress, and she has done so. In the absence of a specific requirement as to the number of sessions, it was not unreasonable for Dr. Williams to reduce her sessions from weekly to bi-weekly, as recommended by Ms. King, without seeking Board approval. Such conduct does not violate any express requirement of Dr. Williams' Board-modified Consent Agreement.

* * * * *

Dr. Williams is an impaired physician with a history of multiple drug overdoses. While Dr. Williams must be commended for maintaining her recovery since February, 1989, this Board cannot tolerate "lapses of judgment" that place her recovery at risk. Dr. Williams has been granted the privilege to practice in this State, subject to her compliance with the specific conditions and limitations of her Consent Agreement. Those conditions and limitations, which are aimed at protecting both Dr. Williams and the health-consuming public, demand strict compliance. Dr. Williams' testimony suggested that her personal use and possession of Darvocet in violation of Clause 8 of her Consent Agreement may have resulted from undue complacency about her disease because of having maintained recovery for a period of three years. The rationalizations she offered for both her unauthorized use of Darvocet and her lack of strict compliance with the drug screen requirements of Clause 10 of her Consent Agreement suggest the need for increased vigilance on Dr. Williams' part. Hopefully, requiring Dr. Williams to take responsibility for compliance and to experience the consequences of noncompliance with her Consent Agreement, will serve to reinforce her efforts and accomplishments in maintaining recovery.

PROPOSED ORDER

It is hereby ORDERED that:

1. The certificate of Mary Beth Williams, M.D., to practice medicine and surgery in the State of Ohio shall be permanently REVOKED. Such revocation is STAYED, and Dr. Williams' certificate is hereby SUSPENDED for a period of fifteen (15) days.

93 MAY -7 PM 2:14

2. Upon reinstatement, Dr. Williams' certificate shall be subject to the following PROBATIONARY terms, conditions, and limitations for a period of at least two (2) years:
 - a. Dr. Williams shall obey all federal, state, and local laws, and all rules governing the practice of medicine in Ohio.
 - b. Dr. Williams shall submit quarterly declarations under penalty of perjury stating whether or not there has been compliance with all the provisions of probation.
 - c. Dr. Williams shall appear in person for interviews before the full Board or its designated representative at three (3) month intervals, or as otherwise requested by the Board.
 - d. In the event that Dr. Williams should leave Ohio for three (3) consecutive months, or reside or practice outside the State, Dr. Williams must notify the State Medical Board in writing of the dates of departure and return. Periods of times spent outside of 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. Dr. Williams shall not purchase, prescribe, order, dispense, administer, or possess (except as provided in paragraph 2.g., below) any controlled substances, and shall be ineligible to reapply for or to hold registration with the United States Drug Enforcement Administration, without prior Board approval.
 - f. Upon reinstatement of Dr. Williams' controlled substance privileges pursuant to Board approval, Dr. Williams shall keep a log of all controlled substances purchased, prescribed, dispensed, or administered. Such log shall be submitted in the format approved by the Board thirty (30) days prior to Dr. Williams' personal appearance before the Board or its designated representative, or as otherwise directed by the Board. Further, Dr. Williams shall make her patient records with regard to such prescribing or dispensing available for review by an agent of the State Medical Board upon request.
 - g. Dr. Williams shall abstain completely from the personal use or possession of drugs, except as prescribed, administered, or dispensed to her by another so



STATE MEDICAL BOARD OF OHIO

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

EXCERPT FROM THE MINUTES OF JUNE 16, 1993

REPORTS AND RECOMMENDATIONS

Dr. Hom announced that the Board would now consider the findings and orders appearing on the Board's agenda.

Dr. Hom asked whether each member of the Board had received, read, and considered the hearing record, the proposed findings, conclusions, and orders, and any objections filed in the matters of: Mary Beth Williams, M.D.; Clive Sinoff, M.D.; Faith L. Holmes; Timothy M. McGrath; and Kathleen M. Quinlan, M.D. A roll call was taken:

ROLL CALL:	Dr. O'Day	- aye
	Mr. Albert	- aye
	Dr. Stienecker	- aye
	Dr. Heidt	- aye
	Dr. Buchan	- aye
	Ms. Noble	- aye
	Dr. Garg	- aye
	Ms. Rolfes	- aye
	Dr. Hom	- aye

Dr. Hom stated that she did not receive the hearing record in the matter of Clive Sinoff, M.D., and would abstain from voting in that matter.

Dr. Hom asked whether each member of the Board understands that the disciplinary guidelines do not limit any sanction to be imposed, and that the range of sanctions available in each matter runs from dismissal to permanent revocation. A roll call was taken:

ROLL CALL:	Dr. O'Day	- aye
	Mr. Albert	- aye
	Dr. Stienecker	- aye
	Dr. Heidt	- aye
	Dr. Buchan	- aye
	Ms. Noble	- aye
	Dr. Garg	- aye
	Ms. Rolfes	- aye
	Dr. Hom	- aye

In accordance with the provision in Section 4731.22(C)(1), Revised Code, specifying that no member of the Board who supervises the investigation of a case shall



STATE MEDICAL BOARD OF OHIO

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

EXCERPT FROM THE MINUTES OF JUNE 16, 1993
IN THE MATTER OF MARY BETH WILLIAMS, M.D.

Page 2

participate in further adjudication of the case, the Secretary and Supervising Member must abstain from further participation in the adjudication of this matter.

The original Reports and Recommendations shall be maintained in the exhibits section of this Journal.

REPORT AND RECOMMENDATION IN THE MATTER OF MARY BETH WILLIAMS, M.D.

.....
MS. ROLFES MOVED TO APPROVE AND CONFIRM MS. SAGE'S PROPOSED FINDINGS OF FACT, CONCLUSIONS, AND ORDER IN THE MATTER OF MARY BETH WILLIAMS, M.D. MR. ALBERT SECONDED THE MOTION.

.....
A roll call vote was taken on Ms. Rolfes' motion:

ROLL CALL VOTE:	Dr. O'Day	- abstain
	Mr. Albert	- aye
	Dr. Stienecker	- aye
	Dr. Heidt	- aye
	Dr. Buchan	- aye
	Ms. Noble	- aye
	Dr. Garg	- aye
	Ms. Rolfes	- aye

The motion carried.



STATE MEDICAL BOARD OF OHIO

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

January 13, 1993

Mary Beth Williams, M.D.
327 Vienna Avenue
Tiffany Square #1
Niles, OH 44446

Dear Doctor Williams:

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 January 24, 1991, you entered into a Consent Agreement with the State Medical Board of Ohio based upon a lengthy history of chemical dependency with numerous overdoses.
- (2) Clause 8 of your Consent Agreement states that you "shall abstain completely from the personal use or possession of drugs, except those prescribed, administered, or dispensed to (you) by another so authorized by law who has full knowledge of (your) history of chemical dependency."

On or about September 1, 1992, you were contacted by a Board investigator regarding several positive urine screens. At that time you related to the investigator that in June you had taken two (2) Darvocet-N 100 for neck pain after falling down some stairs. Further, in an investigatory deposition conducted on December 18, 1992, you stated that in February you had taken one (1) Darvocet-N 100 after "bumping" your elbow and had subsequently taken two (2) Darvocet-N 100 for neck pain after tripping over your dog.

The Darvocet-N 100 which you administered to yourself on these occasions was not prescribed, administered or dispensed to you by another so authorized by law who had full knowledge of your history of chemical dependency for these occasions.

Mailed 1/14/93

- (3) Clause 10 of your Consent Agreement states that you "shall submit to random urine screenings for drugs on a weekly basis"

However, during May and July of 1992 you only submitted two (2) screens per month.

- (4) Clause 13 of your Consent Agreement originally stated that you "shall undergo and continue psychiatric treatment three (3) times per week, or as otherwise directed by the Board."

On October 15, 1991, your approved psychologist submitted a letter to the Board recommending that the Board terminate this requirement. However, your psychologist further recommended and that you continue "on a weekly basis" with Marilyn S. King, MSN, RNCS. On November 13, 1991, you appeared before the Board pursuant to your request for this modification. At that time you reiterated your request to discontinue your meetings with your psychologist, while continuing to see your primary therapist, Marilyn S. King. At this time the Board approved your request.

However, since November 6, 1991, you have seen Mrs. King only on a bi-weekly basis without Board approval.

Your acts, conduct, and/or omissions as alleged in paragraphs (2), (3) and (4) above, individually and/or collectively constitute "violations of the conditions of limitations placed by the board upon a certificate to practice or violation of the conditions of limitation upon which a limited or temporary registration or certificate to practice is issued," as that clause is used in Section 4731.22(B)(15) of the Ohio Revised Code.

- (5) Clause 2 of your January 24, 1991, Consent Agreement states that you "shall submit quarterly declarations under penalty of perjury stating whether there has been compliance with all the conditions of this Consent Agreement."

In quarterly declarations dated January 21, 1992, April 23, 1992, July 10, 1992, and October 9, 1992, you stated under oath that you "have complied with all of the conditions of the Consent Agreement...."

However, as detailed in paragraphs (2), (3) and (4) above, you have not been in compliance with the terms of your January 24, 1991, Consent Agreement.

January 13, 1993

Mary Beth Williams, M.D.
Page 3

Your acts, conduct, and/or omissions as alleged in paragraph (5) above, individually and/or collectively constitute "commission 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: Section 2921.11, Ohio Revised Code, Perjury.

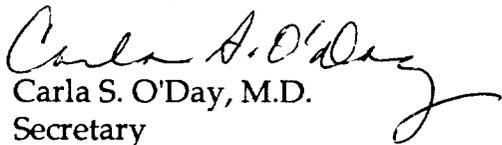
Pursuant to Chapter 119., Ohio Revised Code, you are hereby advised that you are entitled to a hearing in this matter. If you wish to request such hearing, the request must be made in writing and must be received in the offices of the State Medical Board within thirty (30) days of the time of mailing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


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

CSO:jmb

Enclosures:

CERTIFIED MAIL #P 055 328 808
RETURN RECEIPT REQUESTED

cc: Christopher J. Shaker, Esq.

**CONSENT AGREEMENT
BETWEEN
MARY BETH WILLIAMS, M.D.
AND
THE STATE MEDICAL BOARD OF OHIO**

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

Mary Beth Williams, M.D. enters into this 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 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) (26), 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 impairment of ability to practice according to acceptable and prevailing standards of care because of habitual or excessive use or abuse of drugs, alcohol, or other substances that impair ability to practice.
- B. THE STATE MEDICAL BOARD OF OHIO enters into this Consent Agreement in lieu of formal proceedings based upon the violation of Section 4731.22(B) (26), 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. MARY BETH WILLIAMS, M.D. is licensed to practice medicine and surgery in the State of Ohio.
- D. On April 5, 1988 MARY BETH WILLIAMS, M.D. was admitted to Youngstown Osteopathic Hospital as a direct result of an overdose of benzodiazepines. Four (4) outpatient drug screens, subsequent to this admission, were positive for barbiturates.

On November 17, 1988 MARY BETH WILLIAMS, M.D. was admitted to Youngstown Osteopathic Hospital as a direct result of an overdose of benzodiazepines. Four (4) outpatient drug screens, subsequent to this admission, were positive for barbiturates.

On February 14, 1989 MARY BETH WILLIAMS, M.D. was admitted to Youngstown Osteopathic Hospital as a direct result of an overdose of curisprodol.

On June 4, 1990 MARY BETH WILLIAMS, M.D. was admitted to Riverside Methodist Hospitals Alcohol and Drug Dependency Treatment Unit at the prompting of the Ohio State Medical Board. After a mental/chemical dependency evaluation it was

CONSENT AGREEMENT
MARY BETH WILLIAMS, M.D.
PAGE TWO

determined that Dr. Mary Beth Williams' chemical dependency status was in remission.

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

1. DOCTOR Williams shall obey all federal, state and local laws, and all rules governing the practice of medicine in Ohio;
2. DOCTOR WILLIAMS shall submit quarterly declarations under penalty of perjury stating whether there has been compliance with all the conditions of this Consent Agreement.
3. DOCTOR WILLIAMS shall appear in person for interviews before the full BOARD or its designated representatives at three month intervals, or as otherwise directed by the BOARD;
4. In the event that DOCTOR WILLIAMS should leave Ohio for three continuous months, or reside or practice outside the State, DOCTOR WILLIAMS, 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 period under the Consent Agreement;
5. DOCTOR WILLIAMS shall immediately surrender her United States Drug Enforcement Administration Certificate. She shall be ineligible to hold, and shall not apply for, registration with the D.E.A. to prescribe, dispense or administer controlled substances without prior BOARD approval;
6. DOCTOR WILLIAMS shall not prescribe, administer, dispense, order, write orders for, give verbal orders for, or possess any controlled substance as defined by State or Federal law;
7. DOCTOR WILLIAMS shall NOT be permitted to order, write orders for, give verbal orders for, dispense or administer controlled substances as defined by State or Federal law under the D.E.A. registration of the hospital or institution in which she is employed and/or has privileges;
8. DOCTOR WILLIAMS shall abstain completely from the personal use or possession of drugs, except those prescribed, administered, or dispensed to her by another so authorized by law who has full knowledge of DOCTOR WILLIAMS' history of chemical dependency;
9. DOCTOR WILLIAMS shall abstain completely from the use of alcohol;
10. DOCTOR WILLIAMS shall submit to random urine screenings for drugs on a weekly basis or as otherwise directed by the BOARD. DOCTOR WILLIAMS is to ensure that all screening

CONSENT AGREEMENT
MARY BETH WILLIAMS, M.D.
PAGE THREE

reports are forwarded directly to the BOARD on a quarterly basis;

DOCTOR WILLIAMS shall submit the required urine specimens to a supervising physician to be approved by the BOARD. The supervising physician shall ensure that the urine specimens are obtained on a random basis, that the giving of the specimen is witnessed by a reliable person, and that appropriate control over the specimen is maintained. In addition, the supervising physician shall immediately inform the BOARD of any positive screening results.

The supervising physician shall monitor DOCTOR WILLIAMS and provide the BOARD with reports on the doctor's progress and status.

In the event that the designated supervising physician becomes unable or unwilling to so serve, DOCTOR WILLIAMS must immediately notify the BOARD in writing, and make arrangements acceptable to the BOARD for another supervising physician as soon as practicable;

11. The BOARD retains the right to require, and DOCTOR WILLIAMS agrees to submit, blood or urine specimens for analysis upon request and without prior notice.
12. Within 30 days of the effective date of this Consent Agreement, DOCTOR WILLIAMS shall undertake and maintain participation in an alcohol and drug rehabilitation program, such as A.A., N.A., or Caduceus, acceptable to the BOARD no less than four (4) times per week. At her appearances before the BOARD or its designated representative, DOCTOR WILLIAMS shall submit documentary evidence of continuing compliance with this program;
13. Within thirty (30) days of the effective date of this Agreement, DOCTOR WILLIAMS shall submit to the BOARD for its prior approval the name and qualifications of a psychiatrist of her choice. Upon approval by the full BOARD, DOCTOR WILLIAMS shall undergo and continue psychiatric treatment three (3) times per week, or as otherwise directed by the BOARD. DOCTOR WILLIAMS shall ensure that psychiatric reports are forwarded by her treating psychiatrist to the BOARD on a quarterly basis, or as otherwise directed by the BOARD;
14. DOCTOR WILLIAMS shall provide all employers and the Chief of Staff at each hospital where she has, applies for, or obtains privileges with a copy of this Consent Agreement.

The above described terms, limitations and conditions may be amended or terminated in writing at any time upon the agreement of both parties. However, this Agreement shall remain in force for a minimum of two (2) years prior to any request for termination of said Agreement.

CONSENT AGREEMENT
MARY BETH WILLIAMS, M.D.
PAGE FOUR

If, in the discretion of the Secretary of THE STATE MEDICAL BOARD OF OHIO, DOCTOR WILLIAMS appears to have violated or breached any terms or conditions 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 WILLIAMS acknowledges that she 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 WILLIAMS 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.

This information maybe reported to appropriate organizations, data banks and governmental bodies. This Consent Agreement shall become effective, upon the last date of signature below.

Mary Beth Williams
MARY BETH WILLIAMS, M.D.

1-4-91
DATE

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

1/18/91
DATE

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

1/19/91
DATE

John C. Dowling
JOHN C. DOWLING, ESQUIRE
Assistant Attorney General

1/24/91
DATE