

**CONSENT AGREEMENT
BETWEEN
NECKLALL KHOOBLALL, M.D.
AND
THE STATE MEDICAL BOARD OF OHIO**

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

NECKLALL KHOOBLALL, M.D. enters into this Agreement being fully informed of his rights under Chapter 119., Ohio Revised Code, including the right to representation by counsel and the right to a formal adjudicative hearing on the issues considered herein.

This Consent Agreement is entered into on the basis of the following stipulations, admissions and understandings:

- A. THE STATE MEDICAL BOARD OF OHIO is empowered by Section 4731.22 (B)(19), 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)(19), 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. NECKLALL KHOOBLALL, M.D. is an applicant for temporary licensure to practice medicine and surgery in the State of Ohio.
- D. NECKLALL KHOOBLALL, M.D. hereby ADMITS that in September of 1990 he submitted to a mental evaluation, at the direction of the State Medical Board of Ohio, performed by Dr. Michael McNeer and Michael Hernandez, Ph.D. The recommendation from this evaluation was intensive and supportive psychotherapy in order for NECKLALL KHOOBLALL, M.D. to become more self-accepting, to develop more mature defense mechanisms, to develop more self-awareness, and to encourage more effective control.

WHEREFORE, in consideration of the foregoing and mutual promises hereinafter set forth, NECKLALL KHOOBLALL, 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 KHOOBLALL shall obey all federal, state and local laws, and all rules governing the practice of medicine in Ohio;
- 2. DOCTOR KHOOBLALL shall submit quarterly declarations under penalty of perjury stating whether there has been compliance with all the conditions of this Consent Agreement;
- 3. DOCTOR KHOOBLALL shall appear in person for interviews before the full BOARD or its designated representative at three month intervals, or as otherwise directed by the BOARD;
- 4. In the event that DOCTOR KHOOBLALL should leave Ohio for three continuous months, or reside or practice outside the State, DOCTOR KHOOBLALL, 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. Within 30 days of the effective date of this Consent Agreement, DOCTOR KHOOBLALL shall submit to the BOARD for its prior approval the name and qualifications of a clinical psychologist (minimum requirement is Ph.D. status) or a psychiatrist experienced in psychotherapy of his choice. Upon approval by the full BOARD, DOCTOR KHOOBLALL shall undergo and continue psychiatric treatment weekly, or otherwise directed by the BOARD. DOCTOR KHOOBLALL shall ensure that psychiatric reports are forwarded by his treating psychiatrist to the BOARD on a quarterly basis, or as otherwise directed by the BOARD;
- 6. DOCTOR KHOOBLALL 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;

The above described terms, limitations and conditions may be amended or terminated in writing at any time upon agreement of both parties. However, this Agreement shall remain in force for a minimum of three (3) years prior to any request for termination of said Agreement.

If, in the discretion of the Secretary of THE STATE MEDICAL BOARD OF OHIO, DOCTOR KHOOBLALL 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 KHOOBLALL acknowledges that he has had an opportunity to ask questions concerning the terms of this Agreement and that all questions asked have been answered in a satisfactory manner.

Any action initiated by the BOARD based on alleged violations of this Consent Agreement shall comply with the Administrative Procedure Act, Chapter 119., Ohio Revised Code.

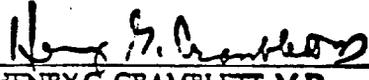
DOCTOR KHOOBLALL hereby releases THE STATE MEDICAL BOARD OF OHIO, its Members, Employees, Agents, Officers and Representatives jointly and severally from any and all liability arising from the within matter.

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



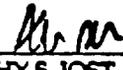
NECKLALL KHOUBLALL, M.D.

Date 11/21/90



HENRY G. CRAMBLETT, M.D.
Secretary

Date 12/4/90



TIMOTHY S. JOST, Esquire
Supervising Member

Date 12/15/90



DOUGLAS C. BOATRIGHT
Assistant Attorney General

Date 12/10/90