

to

BEFORE THE STATE MEDICAL BOARD OF OHIO

IN THE MATTER OF

*

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CASE NO. 19-CRF-0100

LARA KOLLAB, D.O.

*

ENTRY OF ORDER

On July 22, 2020, Lara Kollab, D.O., executed a Surrender of her training certificate to practice osteopathic medicine and surgery in Ohio with consent to permanent revocation, which document is attached hereto and fully incorporated herein.

Wherefore, upon ratification by the Board of the surrender, it is hereby ORDERED that Training Certificate No. 58.030190 authorizing Lara Kollab, D.O., to practice osteopathic medicine and surgery in the State of Ohio be permanently REVOKED.

This Order is hereby entered upon the Journal of the State Medical Board of Ohio for the 12th day of August 2020, and the original thereof shall be kept with said Journal.

Kim G. Rothermel MD / *Kim per authorization*
Kim G. Rothermel, M.D.
Secretary

(SEAL)

August 12, 2020
Date

STATE OF OHIO
THE STATE MEDICAL BOARD
PERMANENT SURRENDER OF
OSTEOPATHIC TRAINING CERTIFICATE TO PRACTICE MEDICINE AND SURGERY

19-CRF-0100

Do not sign this agreement without reading it. An individual who permanently surrenders a certificate issued by the Board is forever thereafter ineligible to hold a certificate to practice or to apply to the Board for reinstatement of the certificate or issuance of any new certificate. You are permitted to be accompanied, represented and advised by an attorney, at your own expense, before deciding to sign this voluntary agreement.

I, Lara Kollab, D.O., am aware of my rights to representation by counsel, the right of being formally charged and having a formal adjudicative hearing and do hereby freely execute this document and choose to take the actions described herein.

I, Lara Kollab, D.O., do hereby voluntarily, knowingly, and intelligently surrender my training certificate to practice osteopathic medicine and surgery, License #58.030190, to the State Medical Board of Ohio [Board], thereby relinquishing all rights to participate in a medical training program and/or to practice osteopathic medicine and surgery in Ohio.

I understand that as a result of the surrender herein I am no longer permitted to participate in a medical training program and/or to practice osteopathic medicine and surgery in any form or manner in the State of Ohio now or in the future.

I agree that I shall be ineligible for, and shall not apply for, reinstatement or restoration of training certificate License #58.030190 or issuance of any other certificate pursuant to the authority of the State Medical Board of Ohio, on or after the date of signing this Permanent Surrender of Training Certificate to Practice Osteopathic Medicine and Surgery. Any such attempted reapplication shall be considered null and void and shall not be processed by the Board.

I hereby authorize the State Medical Board of Ohio to enter upon its Journal an Order permanently revoking my training certificate, License #58.030190, in conjunction with which I expressly waive the provision of Section 4731.22(B), Ohio Revised Code, requiring that six (6) Board Members vote to revoke said certificate, and further expressly and forever waive all rights as set forth in Chapter 119., Ohio Revised Code, including but not limited to my right to counsel, right to a hearing, right to present evidence, right to cross-examine witnesses, and right to appeal the Order of the Board revoking my training certificate to practice osteopathic medicine and surgery.

I, Lara Kollab, D.O., hereby release the Board, its members, employees, agents, officers and representatives jointly and severally from any and all liability arising from the within matter.

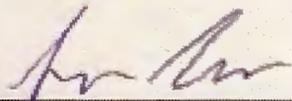
This document shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code. Further, this information may be reported to appropriate organizations, data banks and governmental bodies. I, Lara Kollab, D.O., acknowledge that my social security

number will be used if this information is so reported and agree to provide my social security number to the Board for such purposes.

I, Lara Kollab, D.O., hereby stipulate and agree that I am taking the action described herein in lieu of formal disciplinary proceedings related to the factual and legal allegations set forth in the Notice of Opportunity issued to me by the Board on or about July 10, 2019, a copy of which is attached hereto and incorporated herein. I no longer reside in Ohio and do not wish to maintain my Training Certificate to Practice Osteopathic Medicine and Surgery in Ohio or to pursue any other certificate pursuant to the authority of the State Medical Board of Ohio.

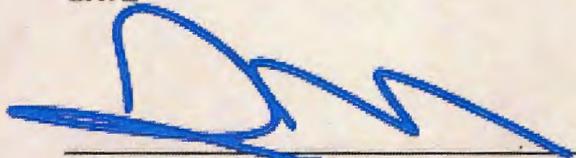
EFFECTIVE DATE

It is expressly understood that this Permanent Surrender of Certificate 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, I specifically acknowledge that the electronic transmission of a scanned or photostatic copy of any executed signature to this Permanent Surrender of Certificate, upon being received by the Board, shall be deemed to have the full legal force and effect as the original.

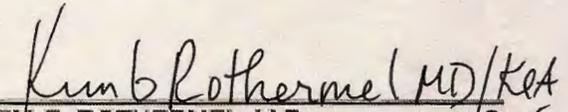


LARA KOLLAB, D.O.

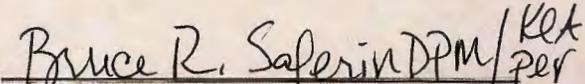
07/22/2020
DATE



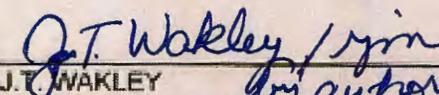
JAMES MCGOVERN
Attorney for Dr. Kollab
7/22/20
DATE



KIM G. ROTHERMEL, M.D.
Secretary
Per authorization
8.12.20
DATE



BRUCE R. SAFERIN, D.P.M.
Supervising Member
Per authorization
8.12.20
DATE



J.T. WAKLEY
Assistant Attorney General
by authorization
July 27, 2020
DATE



State Medical Board of

Ohio

30 E. Broad St., 3rd Floor
Columbus, Ohio 43215
(614) 466-3934
www.med.ohio.gov

July 10, 2019

Case number: 19-CRF-0100

Lara Kollab, D.O.
1444 Adelaide Street
Westlake, OH 44145-2468

Dear Doctor Kollab:

In accordance with Chapter 119., Ohio Revised Code, you are hereby notified that the State Medical Board of Ohio [Board] intends to determine whether or not to limit, revoke, permanently revoke, suspend, refuse to grant or register or renew or reinstate your training license/certificate to practice osteopathic medicine and surgery, or to reprimand you or place you on probation for one or more of the following reasons:

(1) On or about June 19, 2019, you participated in an investigatory deposition conducted by Board staff where you were questioned about numerous anti-Semitic comments you had posted on social media. You admitted that you authored/posted/tweeted such comments, including, but not limited to, the following:

- August 20, 2011: "Allah will take the Jews." [as translated]
- December 4, 2011: "eh schools ok. I graduate undergrad next year and then med school * * *"
- January 1, 2012: "so basically every insult I say is directed at the Jews haha. Even if I do something really stupid I say 'stupid stupid Jews hehe.'" [as translated]
- January 2, 2012: "hahha ewww . . . I'll purposely give all the yahood [Jews] the wrong meds . . ."
- June 10, 2012: "reminiscing about the jesr and how the yahood [Jews] unfold and mess up all our clothes, steal things from our suitcases, . . . ugh klab [dogs]."
- October 9, 2012: "Of course the only prejudice my class focuses on is US racism against African Americans and the Holocaust. Poor Jews. They're so oppressed."

Mailed 7-11-19

- October 22, 2012: "After this debate, I have to watch a movie on the holocaust and write a paper on it. I am going to be brutally unsympathetic. #sorrynotsorry"
 - May 4, 2013: "Studying for my med micro final, came across this. Clearly, I pay attention in class and write useful notes.
People who support Israel should have their immune cells killed so they can see how it feels to not be able to defend yourself from foreign invaders."
- (2) In a sworn statement that you provided to the Board on or about February 4, 2019, you stated, "At the time that the offensive tweets were posted, I was an undergraduate student at John Carrol University." Your aforementioned February 2019 sworn statement was false because, in fact, you continued to author/post/tweet anti-Semitic comments after your graduation on or about May 19, 2013, including the following:
- August 27, 2013: "Look, Haifa is sweet, but it's full of Jewish dogs, and it looks like America, meaning, it wasn't that special to me." [as translated]
 - August 28, 2013: "May Allah take away the Jews so we stop being forced to go to those dirty ones." [as translated]
 - September 11, 2013: "Norm. Jewish. Constantly remind ppl of the Holocaust, relate those who did 9/11 to Nazis, justify Israel's bloodlust. Disgusting."
- (3) You indicated that you applied to at least fourteen allopathic medicine schools and seven osteopathic schools, and were accepted at two osteopathic schools. On or about October 7, 2013, your initial application fee was submitted to Touro Osteopathic Medical School [Touro], which you described in your February 2019 sworn statement as "a school deeply rooted in Jewish tradition." At your June 2019 deposition, you admitted that after being accepted Touro, you deleted the anti-Semitic tweets from your Twitter feed. You also acknowledged that if Touro had known of your anti-Semitic tweets they probably would not have admitted you as an osteopathic medical student. You graduated from Touro in June 2018.
- (4) On or about July 1, 2018, you began an internal medicine residency at the Cleveland Clinic [CCF]. On or about August 31, 2018, the Program Director informed you that CCF had recently become aware of a profile of your tweets compiled by Canary Mission (an organization that documents people and groups that promote anti-Semitic views). A few hours after meeting with the Program Director, one of your family members passed away. You continued in the CCF residency program in normal course for approximately one month thereafter. On or about September 27, 2018, CCF program representatives informed you that you were going to be dismissed from the residency program due to your discriminatory social media posting. You stated that you were given the option to resign, and were told that if you did so, CCF would not disclose the reason for your departure to any other programs. You choose to resign in lieu of termination, with your resignation effective on October 18, 2018.
- (5) In or about early December 2018, you interviewed with Kerns Medical Center [KMC] in California in an effort to secure a position in their residency training program. When

KMC asked why you had left the CCF residency training program, you claimed that you had resigned because of a death in the family. You did not disclose that, in fact, you had resigned in lieu of termination due to your discriminatory social media posting. Although you subsequently matched with KMC through the National Resident Matching Program, KMC discovered your discriminatory social media posting and withdrew the position before offering you a formal contract.

- (6) On or about December 27, 2018, you sent the following reply message to @canarymission and @WeAreTouro in which you falsely claimed that Canary Mission had used a fake account in an effort to frame you. When questioned about this message at your June 2019 deposition, you admitted that the content of your December 27, 2018 message was false and that you knew it was false at the time you authored and posted/tweeted the message.
- December 27, 2018: "That's a fake account, stop trying to frame me, you psychos. You're an anonymous website harassing me with a fake twitter profile made of me. Every Jewish and non-Jewish patient I've ever had will speak to how much I love and care for ALL of my patients."
- (7) On or about January 2, 2019, the mainstream media began covering the story related to your discriminatory tweets.
- (8) Although you asserted at your June 2019 deposition that you now feel ashamed of your discriminatory comments, when asked if your tweets reflect good moral character, you admitted that they do not.

Your acts, conduct, and/or omissions as alleged in paragraphs (1) through (8) above, individually and/or collectively, constitute a failure to furnish evidence satisfactory to the board of good moral character as required by Section 4731.291(A)(1), Ohio Revised Code, both as was in effect on or about the date of issuance of your osteopathic training certificate on July 24, 2018, and as currently effective commencing on September 28, 2018. Further, pursuant to Section 4731.291(C), Ohio Revised Code, a training certificate may be revoked by the board "upon proof, satisfactory to the board, that the holder thereof has engaged in unethical conduct or that there are grounds for action against the holder under section 4731.22 of the Revised Code," both as was in effect on or about the date of issuance of your osteopathic training certificate on July 24, 2018, and as currently effective commencing on September 28, 2018.

Further, your acts, conduct, and/or omissions as alleged in paragraphs (2), (5), and (6) above, individually and/or collectively, constitute "[m]aking a false, fraudulent, deceptive, or misleading statement . . . in relation to the practice of medicine and surgery, osteopathic medicine and surgery, podiatric medicine and surgery, or a limited branch of medicine;" as that clause is used in Section 4731.22(B)(5), Ohio Revised Code.

Furthermore, for any violations that occurred on or after September 29, 2015, the board may impose a civil penalty in an amount that shall not exceed twenty thousand dollars, pursuant to Section 4731.225, Ohio Revised Code. The civil penalty may be in addition to any other action the board may take under section 4731.22, 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 days of the time of mailing of this notice.

You are further advised that, if you timely request a hearing, 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 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, permanently revoke, suspend, refuse to grant or register or renew or reinstate your training certificate/license to practice osteopathic medicine and surgery or to reprimand you or place you on probation.

Please note that, whether or not you request a hearing, Section 4731.22(L), Ohio Revised Code, provides that "[w]hen the board refuses to grant or issue a license or certificate to practice to an applicant, revokes an individual's license or certificate to practice, refuses to renew an individual's license or certificate to practice, or refuses to reinstate an individual's license or certificate to practice, the board may specify that its action is permanent. An individual subject to a permanent action taken by the board is forever thereafter ineligible to hold a license or certificate to practice and the board shall not accept an application for reinstatement of the license or certificate or for issuance of a new license or certificate."

Copies of the applicable sections are enclosed for your information.

Very truly yours,



Kim G. Rothermel, M.D.
Secretary

KGR/RJM/jmb
Enclosures

CERTIFIED MAIL #91 7199 9991 7038 7136 3426
RETURN RECEIPT REQUESTED

cc: James McGovern, Esq.
Graff & McGovern, LPA
604 East Rich Street
Columbus, OH 43215

CERTIFIED MAIL #91 7199 9991 7038 7136 3433
RETURN RECEIPT REQUESTED

cc: Ziad Tayeh, Esq.
Tayeh Law Offices, LLC
11509 Lorain Avenue
Cleveland, OH 44111

CERTIFIED MAIL #91 7199 9991 7038 7136 3440
RETURN RECEIPT REQUESTED