

IN THE MATTER

OF

DANIELLE ROBERTS, D.O.

STATEMENT  
OF  
CHARGES

DANIELLE ROBERTS, D.O., the Respondent, was authorized to practice medicine in New York State on or about October 5, 2009, by the issuance of license number 255075 by the New York State Education Department.

**FACTUAL ALLEGATIONS**

- A. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient A, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.

4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- B. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient B, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  12. Respondent failed to provide appropriate medical care and treatment for the patient.
  13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
- C. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient C, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- D. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient D, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  12. Respondent failed to provide appropriate medical care and treatment for the patient.
  13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
- E. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient E, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- F. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient F, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

- 10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  - 11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  - 12. Respondent failed to provide appropriate medical care and treatment for the patient.
  - 13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
- G. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient G, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
- 1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  - 2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  - 3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  - 4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- H. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient H, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  12. Respondent failed to provide appropriate medical care and treatment for the patient.
  13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
- I. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient I, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- J. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient J, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  12. Respondent failed to provide appropriate medical care and treatment for the patient.
  13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
- K. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient K, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- L. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient L, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  12. Respondent failed to provide appropriate medical care and treatment for the patient.
  13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
- M. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient M, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- N. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient N, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  12. Respondent failed to provide appropriate medical care and treatment for the patient.
  13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
- O. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient O, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- P. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient P, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  12. Respondent failed to provide appropriate medical care and treatment for the patient.
  13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
- Q. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient Q, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- R. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient R, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  12. Respondent failed to provide appropriate medical care and treatment for the patient.
  13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
- S. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient S, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- T. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient T, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

- 10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  - 11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  - 12. Respondent failed to provide appropriate medical care and treatment for the patient.
  - 13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
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- U. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient U, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
    - 1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
    - 2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
    - 3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
    - 4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- V. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient V, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.
  5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
  6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
  7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
  8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
  9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.

10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
  11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
  12. Respondent failed to provide appropriate medical care and treatment for the patient.
  13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.
- W. On or about March, 2017, the Respondent intentionally used a cauterizing iron as part of a branding procedure and/or rite to permanently alter and/or disfigure the skin by branding Patient W, a female patient, hereinafter identified in the attached Appendix "A", with the initials KR/AM in the pelvis region, thereby leaving a permanent scar.
1. Respondent performed the branding procedure and/or rite in an other than appropriately sterile environment and/or without appropriate infection control.
  2. Respondent, while performing the branding procedure and/or rite, caused the patient to suffer excruciating pain for no known medical purpose.
  3. The patient requested on multiple occasions that Respondent cease performing the branding procedure and/or rite, which said Respondent failed to do.
  4. Respondent failed to cease performing the branding procedure and/or rite despite the fact that the patient screamed on multiple occasions because of the excruciating pain she was experiencing.

5. Respondent, during the course of the branding procedure and/or rite, tortured and physically abused the patient.
6. Respondent performed the branding procedure and/or rite upon the patient at the time the patient was naked and while being held down by three other individuals, who were also naked, contrary to any appropriate medical protocol or need.
7. Respondent knowingly performed a branding procedure and/or rite upon the patient when Respondent knew, or should have known, that the patient believed that she was only having a tattoo applied to her pelvic region.
8. Respondent inappropriately performed the branding procedure and/or rite upon the patient while an individual who was also naked utilized a cell phone to video said branding procedure and/or rite without the consent of the patient.
9. Respondent failed to provide appropriate wound care for the patient at the time of the branding procedure and/or rite and thereafter.
10. Respondent failed to refer the patient to a specialist after the branding procedure and/or rite to provide appropriate wound care.
11. Respondent inappropriately advised the patient to take photos of the wound caused by the branding procedure and/or rite on a daily basis for one month and once a week for another month, and to thereafter send such photographs to an individual known as "Lauren Salzman".
12. Respondent failed to provide appropriate medical care and treatment for the patient.
13. Respondent failed to prepare and/or maintain appropriate medical records for the patient which accurately reflected the evaluation and treatment of the patient.

- X. In on or about 2014, the Respondent provided medical care and treatment to Patient X, as identified in the Appendix. The Respondent's medical care of Patient X deviated from accepted standards of care as follows:
1. Respondent failed to prepare and/or maintain appropriate records which accurately reflected the evaluation and treatment of Patient X.
- Y. In on or about 2016, the Respondent provided medical care and treatment to Patient Y, as identified in the Appendix. The Respondent's medical care of Patient Y deviated from accepted standards of care as follows:
1. Respondent failed to prepare and/or maintain appropriate records which accurately reflected the evaluation and treatment of Patient Y.
- Z. During the time from on or about June 2016 through August 2016, NXIVM and/or the Executive Success Program (ESP) conducted a conference and/or meeting at the Silver Bay Conference and Family Retreat Center (Conference Center), located in Silver Bay, New York. The Respondent and approximately 300 to 400 other individuals attended the conference, including 50 to 60 children. During the course of the conference, hundreds of the attendees became severely ill with an undetermined communicable disease. The individuals who became ill suffered inter alia, flu-like symptoms, severe vomiting and diarrhea. The Respondent had knowledge of the fact that many individuals at the conference had become ill. The Respondent knew or should have known that the illness suffered by the attendees at the conference was a communicable disease, outbreak of a communicable disease, and/or an unusual disease or outbreak.
1. Respondent failed to report the suspected or confirmed case of communicable disease, outbreak of communicable disease, and/or the unusual disease or

- outbreak to the city, county, or district health officer as required by Title 10 N.Y.C.R.R. Section 2.10.
2. Respondent failed to report by telephone, facsimile, or other electronic communication, or in person the illness of the attendees at the conference suspected or confirmed to have been caused due to the consumption of spoiled or poisonous food to the city, county, or district health officer, in violation of Title 10 N.Y.C.R.R. Section 2.15.
  3. Upon being made aware of the fact that attendees at the conference might have been suffering from a communicable disease, the Respondent failed to cause such individuals to be isolated in an appropriate environment, pending official action by the health officer, in violation of Title 10 N.Y.C.R.R. Section 2.27.

**SPECIFICATIONS OF CHARGES**

**FIRST THROUGH TWENTY-THIRD SPECIFICATIONS**  
**WILLFULLY ABUSING A PATIENT**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(31) by willfully abusing a patient as alleged in the facts of:

1. The facts in paragraphs A and A.1, A and A.2, A and A.3, A and A.4, A and A.5, A and A.6, A and A.7, A and A.8, A and A.9, A and A.10, A and A.11, A and A.12, and/or A and A.13.
2. The facts in paragraphs B and B.1, B and B.2, B and B.3, B and B.4, B and B.5, B and B.6, B and B.7, B and B.8, B and B.9, B and B.10, B and B.11, B and B.12, and/or B and B.13.
3. The facts in paragraphs C and C.1, C and C.2, C and C.3, C and C.4, C and C.5, C and C.6, C and C.7, C and C.8, C and C.9, C and C.10, C and C.11, C and C.12, and/or C and C.13.
4. The facts in paragraphs D and D.1, D and D.2, D and D.3, D and D.4, D and D.5, D and D.6, D and D.7, D and D.8, D and D.9, D and D.10, D and D.11, D and D.12, and/or D and D.13.
5. The facts in paragraphs E and E.1, E and E.2, E and E.3, E and E.4, E and E.5, E and E.6, E and E.7, E and E.8, E and E.9, E and E.10, E and E.11, E and E.12, and/or E and E.13.

6. The facts in paragraphs F and F.1, F and F.2, F and F.3, F and F.4, F and F.5, F and F.6, F and F.7, F and F.8, F and F.9, F and F.10, F and F.11, F and F.12, and/or F and F.13.
7. The facts in paragraphs G and G.1, G and G.2, G and G.3, G and G.4, G and G.5, G and G.6, G and G.7, G and G.8, G and G.9, G and G.10, G and G.11, G and G.12, and/or G and G.13.
8. The facts in paragraphs H and H.1, H and H.2, H and H.3, H and H.4, H and H.5, H and H.6, H and H.7, H and H.8, H and H.9, H and H.10, H and H.11, H and H.12, and/or H and H.13.
9. The facts in paragraphs I and I.1, I and I.2, I and I.3, I and I.4, I and I.5, I and I.6, I and I.7, I and I.8, I and I.9, I and I.10, I and I.11, I and I.12, and/or I and I.13.
10. The facts in paragraphs J and J.1, J and J.2, J and J.3, J and J.4, J and J.5, J and J.6, J and J.7, J and J.8, J and J.9, J and J.10, J and J.11, J and J.12, and/or J and J.13.
11. The facts in paragraphs K and K.1, K and K.2, K and K.3, K and K.4, K and K.5, K and K.6, K and K.7, K and K.8, K and K.9, K and K.10, K and K.11, K and K.12, and/or K and K.13.
12. The facts in paragraphs L and L.1, L and L.2, L and L.3, L and L.4, L and L.5, L and L.6, L and L.7, L and L.8, L and L.9, L and L.10, L and L.11, L and L.12, and/or L and L.13.

13. The facts in paragraphs M and M.1, M and M.2, M and M.3, M and M.4, M and M.5, M and M.6, M and M.7, M and M.8, M and M.9, M and M.10, M and M.11, M and M.12, and/or M and M.13.
14. The facts in paragraphs N and N.1, N and N.2, N and N.3, N and N.4, N and N.5, N and N.6, N and N.7, N and N.8, N and N.9, N and N.10, N and N.11, N and N.12, and/or N and N.13.
15. The facts in paragraphs O and O.1, O and O.2, O and O.3, O and O.4, O and O.5, O and O.6, O and O.7, O and O.8, O and O.9, O and O.10, O and O.11, O and O.12, and/or O and O.13.
16. The facts in paragraphs P and P.1, P and P.2, P and P.3, P and P.4, P and P.5, P and P.6, P and P.7, P and P.8, P and P.9, P and P.10, P and P.11, P and P.12, and/or P and P.13.
17. The facts in paragraphs Q and Q.1, Q and Q.2, Q and Q.3, Q and Q.4, Q and Q.5, Q and Q.6, Q and Q.7, Q and Q.8, Q and Q.9, Q and Q.10, Q and Q.11, Q and Q.12, and/or Q and Q.13.
18. The facts in paragraphs R and R.1, R and R.2, R and R.3, R and R.4, R and R.5, R and R.6, R and R.7, R and R.8, R and R.9, R and R.10, R and R.11, R and R.12, and/or R and R.13.
19. The facts in paragraphs S and S.1, S and S.2, S and S.3, S and S.4, S and S.5, S and S.6, S and S.7, S and S.8, S and S.9, S and S.10, S and S.11, S and S.12, and/or S and S.13.

20. The facts in paragraphs T and T.1, T and T.2, T and T.3, T and T.4, T and T.5, T and T.6, T and T.7, T and T.8, T and T.9, T and T.10, T and T.11, T and T.12, and/or T and T.13.
21. The facts in paragraphs U and U.1, U and U.2, U and U.3, U and U.4, U and U.5, U and U.6, U and U.7, U and U.8, U and U.9, U and U.10, U and U.11, U and U.12, and/or U and U.13.
22. The facts in paragraphs V and V.1, V and V.2, V and V.3, V and V.4, V and V.5, V and V.6, V and V.7, V and V.8, V and V.9, V and V.10, V and V.11, V and V.12, and/or V and V.13.
23. The facts in paragraphs W and W.1, W and W.2, W and W.3, W and W.4, W and W.5, W and W.6, W and W.7, W and W.8, W and W.9, W and W.10, W and W.11, W and W.12, and/or W and W.13.

**TWENTY-FOURTH THROUGH  
FORTY-SIXTH SPECIFICATIONS**

**CONDUCT IN THE PRACTICE OF MEDICINE  
WHICH EVIDENCES MORAL UNFITNESS**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(20)

24. The facts in paragraphs A and A.1, A and A.2, A and A.3, A and A.4, A and A.5, A and A.6, A and A.7, A and A.8, A and A.9, A and A.10, A and A.11, A and A.12, and/or A and A.13.

25. The facts in paragraphs B and B.1, B and B.2, B and B.3, B and B.4, B and B.5, B and B.6, B and B.7, B and B.8, B and B.9, B and B.10, B and B.11, B and B.12, and/or B and B.13.
26. The facts in paragraphs C and C.1, C and C.2, C and C.3, C and C.4, C and C.5, C and C.6, C and C.7, C and C.8, C and C.9, C and C.10, C and C.11, C and C.12, and/or C and C.13.
27. The facts in paragraphs D and D.1, D and D.2, D and D.3, D and D.4, D and D.5, D and D.6, D and D.7, D and D.8, D and D.9, D and D.10, D and D.11, D and D.12, and/or D and D.13.
28. The facts in paragraphs E and E.1, E and E.2, E and E.3, E and E.4, E and E.5, E and E.6, E and E.7, E and E.8, E and E.9, E and E.10, E and E.11, E and E.12, and/or E and E.13.
29. The facts in paragraphs F and F.1, F and F.2, F and F.3, F and F.4, F and F.5, F and F.6, F and F.7, F and F.8, F and F.9, F and F.10, F and F.11, F and F.12, and/or F and F.13.
30. The facts in paragraphs G and G.1, G and G.2, G and G.3, G and G.4, G and G.5, G and G.6, G and G.7, G and G.8, G and G.9, G and G.10, G and G.11, G and G.12, and/or G and G.13.
31. The facts in paragraphs H and H.1, H and H.2, H and H.3, H and H.4, H and H.5, H and H.6, H and H.7, H and H.8, H and H.9, H and H.10, H and H.11, H and H.12, and/or H and H.13.

32. The facts in paragraphs I and I.1, I and I.2, I and I.3, I and I.4, I and I.5, I and I.6, I and I.7, I and I.8, I and I.9, I and I.10, I and I.11, I and I.12, and/or I and I.13.
33. The facts in paragraphs J and J.1, J and J.2, J and J.3, J and J.4, J and J.5, J and J.6, J and J.7, J and J.8, J and J.9, J and J.10, J and J.11, J and J.12, and/or J and J.13.
34. The facts in paragraphs K and K.1, K and K.2, K and K.3, K and K.4, K and K.5, K and K.6, K and K.7, K and K.8, K and K.9, K and K.10, K and K.11, K and K.12, and/or K and K.13.
35. The facts in paragraphs L and L.1, L and L.2, L and L.3, L and L.4, L and L.5, L and L.6, L and L.7, L and L.8, L and L.9, L and L.10, L and L.11, L and L.12, and/or L and L.13.
36. The facts in paragraphs M and M.1, M and M.2, M and M.3, M and M.4, M and M.5, M and M.6, M and M.7, M and M.8, M and M.9, M and M.10, M and M.11, M and M.12, and/or M and M.13.
37. The facts in paragraphs N and N.1, N and N.2, N and N.3, N and N.4, N and N.5, N and N.6, N and N.7, N and N.8, N and N.9, N and N.10, N and N.11, N and N.12, and/or N and N.13.
38. The facts in paragraphs O and O.1, O and O.2, O and O.3, O and O.4, O and O.5, O and O.6, O and O.7, O and O.8, O and O.9, O and O.10, O and O.11, O and O.12, and/or O and O.13.

39. The facts in paragraphs P and P.1, P and P.2, P and P.3, P and P.4, P and P.5, P and P.6, P and P.7, P and P.8, P and P.9, P and P.10, P and P.11, P and P.12, and/or P and P.13.
40. The facts in paragraphs Q and Q.1, Q and Q.2, Q and Q.3, Q and Q.4, Q and Q.5, Q and Q.6, Q and Q.7, Q and Q.8, Q and Q.9, Q and Q.10, Q and Q.11, Q and Q.12, and/or Q and Q.13.
41. The facts in paragraphs R and R.1, R and R.2, R and R.3, R and R.4, R and R.5, R and R.6, R and R.7, R and R.8, R and R.9, R and R.10, R and R.11, R and R.12, and/or R and R.13.
42. The facts in paragraphs S and S.1, S and S.2, S and S.3, S and S.4, S and S.5, S and S.6, S and S.7, S and S.8, S and S.9, S and S.10, S and S.11, S and S.12, and/or S and S.13.
43. The facts in paragraphs T and T.1, T and T.2, T and T.3, T and T.4, T and T.5, T and T.6, T and T.7, T and T.8, T and T.9, T and T.10, T and T.11, T and T.12, and/or T and T.13.
44. The facts in paragraphs U and U.1, U and U.2, U and U.3, U and U.4, U and U.5, U and U.6, U and U.7, U and U.8, U and U.9, U and U.10, U and U.11, U and U.12, and/or U and U.13.
45. The facts in paragraphs V and V.1, V and V.2, V and V.3, V and V.4, V and V.5, V and V.6, V and V.7, V and V.8, V and V.9, V and V.10, V and V.11, V and V.12, and/or V and V.13.

46. The facts in paragraphs W and W.1, W and W.2, W and W.3, W and W.4, W and W.5, W and W.6, W and W.7, W and W.8, W and W.9, W and W.10, W and W.11, W and W.12, and/or W and W.13.

#### **FORTY-SEVENTH THROUGH SIXTY-NINTH SPECIFICATIONS**

##### **FAILING TO USE SCIENTIFICALLY ACCEPTED INFECTION CONTROL PRACTICES**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(47)

47. The facts in paragraphs A and A.1, A and A.8, A and A.9, A and A.10, and/or A and A.11.

48. The facts in paragraphs B and B.1, B and B.8, B and B.9, B and B.10, and/or B and B.11.

49. The facts in paragraphs C and C.1, C and C.8, C and C.9, C and C.10, and/or C and C.11.

50. The facts in paragraphs D and D.1, D and D.8, D and D.9, D and D.10, and/or D and D.11.

51. The facts in paragraphs E and E.1, E and E.8, E and E.9, E and E.10, and/or E and E.11.

52. The facts in paragraphs F and F.1, F and F.8, F and F.9, F and F.10, and/or F and F.11.

53. The facts in paragraphs G and G.1, G and G.8, G and G.9, G and G.10, and/or G and G.11.
54. The facts in paragraphs H and H.1, H and H.8, H and H.9, H and H.10, and/or H and H.11.
55. The facts in paragraphs I and I.1, I and I.8, I and I.9, I and I.10, and/or I and I.11.
56. The facts in paragraphs J and J.1, J and J.8, I and J.9, J and J.10, and/or J and J.11.
57. The facts in paragraphs K and K.1, K and K.8, K and K.9, K and K.10, and/or K and K.11.
58. The facts in paragraphs L and L.1, L and L.8, L and L.9, L and L.10, and/or L and L.11.
59. The facts in paragraphs M and M.1, M and M.8, M and M.9, M and M.10, and/or M and M.11.
60. The facts in paragraphs N and N.1, N and N.8, N and N.9, N and N.10, and/or N and N.11.
61. The facts in paragraphs O and O.1, O and O.8, O and O.9, O and O.10, and/or O and O.11.
62. The facts in paragraphs P and P.1, P and P.8, P and P.9, P and P.10, and/or P and P.11.
63. The facts in paragraphs Q and Q.1, Q and Q.8, Q and Q.9, Q and Q.10, and/or Q and Q.11.

64. The facts in paragraphs R and R.1, R and R.8, R and R.9, R and R.10, and/or R and R. 11.
65. The facts in paragraphs S and S.1, S and S.8, S and S.9, S and S.10, and/or S and S.11.
66. The facts in paragraphs T and T.1, T and T.8, T and T.9, T and T.10, and/or T and T.11.
67. The facts in paragraphs U and U.1, U and U.8, U and U.9, U and U.10, and/or U and U.11.
68. The facts in paragraphs V and V.1, V and V.8, V and V.9, V and V.10, and/or V and V.11.
69. The facts in paragraphs W and W.1, W and W.8, W and W.9, W and W.10, and/or W and W.11.

**SEVENTIETH THROUGH NINETY-SECOND SPECIFICATIONS**

**PRACTICING THE PROFESSION FRAUDULENTLY OR BEYOND ITS SCOPE**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(2)

70. The facts in paragraphs A and A.2, A and A.3, A and A.4, and/or A and A.7.
71. The facts in paragraphs B and B.2, B and B.3, B and B.4, and/or B and B.7.
72. The facts in paragraphs C and C.2, C and C.3, C and C.4, and/or C and C.7.
73. The facts in paragraphs D and D.2, D and D.3, D and D.4, and/or D and D.7.

74. The facts in paragraphs E and E.2, E and E.3, E and E.4, and/or E and E.7.
75. The facts in paragraphs F and F.2, F and F.3, F and F.4, and/or F and F.7.
76. The facts in paragraphs G and G.2, G and G.3, G and G.4, and/or G and G.7.
77. The facts in paragraphs H and H.2, H and H.3, H and H.4, and/or H and H.7.
78. The facts in paragraphs I and I.2, I and I.3, I and I.4, and/or I and I.7.
79. The facts in paragraphs J and J.2, J and J.3, J and J.4, and/or J and J.7.
80. The facts in paragraphs K and K.2, K and K.3, K and K.4, and/or K and K.7.
81. The facts in paragraphs L and L.2, L and L.3, L and L.4, and/or L and L.7.
82. The facts in paragraphs M and M.2, M and M.3, M and M.4, and/or M and M.7.
83. The facts in paragraphs N and N.2, N and N.3, N and N.4, and/or N and N.7.
84. The facts in paragraphs O and O.2, O and O.3, O and O.4, and/or O and O.7.
85. The facts in paragraphs P and P.2, P and P.3, P and P.4, and/or P and P.7.
86. The facts in paragraphs Q and Q.2, Q and Q.3, Q and Q.4, and/or Q and Q.7.
87. The facts in paragraphs R and R.2, R and R.3, R and R.4, and/or R and R.7.
88. The facts in paragraphs S and S.2, S and S.3, S and S.4, and/or S and S.7.
89. The facts in paragraphs T and T.2, T and T.3, T and T.4, and/or T and T.7.
90. The facts in paragraphs U and U.2, U and U.3, U and U.4, and/or U and U.7.
91. The facts in paragraphs V and V.2, V and V.3, V and V.4, and/or V and V.7.
92. The facts in paragraphs W and W.2, W and W.3, W and W.4, and/or W and W.7.

**NINETY-THIRD THROUGH ONE HUNDRED FIFTEENTH SPECIFICATIONS**

**PRACTICING THE PROFESSION WITH GROSS NEGLIGENCE**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(4)

93. The facts in paragraphs A and A.1, A and A.2, A and A.3, A and A.4, A and A.5, A and A.6, A and A.7, A and A.8, A and A.9, A and A.10, A and A.11, A and A.12, and/or A and A.13.
94. The facts in paragraphs B and B.1, B and B.2, B and B.3, B and B.4, B and B.5, B and B.6, B and B.7, B and B.8, B and B.9, B and B.10, B and B.11, B and B.12, and/or B and B.13.
95. The facts in paragraphs C and C.1, C and C.2, C and C.3, C and C.4, C and C.5, C and C.6, C and C.7, C and C.8, C and C.9, C and C.10, C and C.11, C and C.12, and/or C and C.13.
96. The facts in paragraphs D and D.1, D and D.2, D and D.3, D and D.4, D and D.5, D and D.6, D and D.7, D and D.8, D and D.9, D and D.10, D and D.11, D and D.12, and/or D and D.13.
97. The facts in paragraphs E and E.1, E and E.2, E and E.3, E and E.4, E and E.5, E and E.6, E and E.7, E and E.8, E and E.9, E and E.10, E and E.11, E and E.12, and/or E and E.13.
98. The facts in paragraphs F and F.1, F and F.2, F and F.3, F and F.4, F and F.5, F and F.6, F and F.7, F and F.8, F and F.9, F and F.10, F and F.11, F and F.12, and/or F and F.13.

99. The facts in paragraphs G and G.1, G and G.2, G and G.3, G and G.4, G and G.5, G and G.6, G and G.7, G and G.8, G and G.9, G and G.10, G and G.11, G and G.12, and/or G and G.13.
100. The facts in paragraphs H and H.1, H and H.2, H and H.3, H and H.4, H and H.5, H and H.6, H and H.7, H and H.8, H and H.9, H and H.10, H and H.11, H and H.12, and/or H and H.13.
101. The facts in paragraphs I and I.1, I and I.2, I and I.3, I and I.4, I and I.5, I and I.6, I and I.7, I and I.8, I and I.9, I and I.10, I and I.11, I and I.12, and/or I and I.13.
102. The facts in paragraphs J and J.1, J and J.2, J and J.3, J and J.4, J and J.5, J and J.6, J and J.7, J and J.8, J and J.9, J and J.10, J and J.11, J and J.12, and/or J and J.13.
103. The facts in paragraphs K and K.1, K and K.2, K and K.3, K and K.4, K and K.5, K and K.6, K and K.7, K and K.8, K and K.9, K and K.10, K and K.11, K and K.12, and/or K and K.13.
104. The facts in paragraphs L and L.1, L and L.2, L and L.3, L and L.4, L and L.5, L and L.6, L and L.7, L and L.8, L and L.9, L and L.10, L and L.11, L and L.12, and/or L and L.13.
105. The facts in paragraphs M and M.1, M and M.2, M and M.3, M and M.4, M and M.5, M and M.6, M and M.7, M and M.8, M and M.9, M and M.10, M and M.11, M and M.12, and/or M and M.13.

106. The facts in paragraphs N and N.1, N and N.2, N and N.3, N and N.4, N and N.5, N and N.6, N and N.7, N and N.8, N and N.9, N and N.10, N and N.11, N and N.11, N and N.12, and/or N and N.13.
107. The facts in paragraphs O and O.1, O and O.2, O and O.3, O and O.4, O and O.5, O and O.6, O and O.7, O and O.8, O and O.9, O and O.10, O and O.11, O and O.12, and/or O and O.13.
108. The facts in paragraphs P and P.1, P and P.2, P and P.3, P and P.4, P and P.5, P and P.6, P and P.7, P and P.8, P and P.9, P and P.10, P and P.11, P and P.12, and/or P and P.13.
109. The facts in paragraphs Q and Q.1, Q and Q.2, Q and Q.3, Q and Q.4, Q and Q.5, Q and Q.6, Q and Q.7, Q and Q.8, Q and Q.9, Q and Q.10, Q and Q.11, Q and Q.12, and/or Q and Q.13.
110. The facts in paragraphs R and R.1, R and R.2, R and R.3, R and R.4, R and R.5, R and R.6, R and R.7, R and R.8, R and R.9, R and R.10, R and R.11, R and R.12, and/or R and R.13.
111. The facts in paragraphs S and S.1, S and S.2, S and S.3, S and S.4, S and S.5, S and S.6, S and S.7, S and S.8, S and S.9, S and S.10, S and S.11, S and S.12, and/or S and S.13.
112. The facts in paragraphs T and T.1, T and T.2, T and T.3, T and T.4, T and T.5, T and T.6, T and T.7, T and T.8, T and T.9, T and T.10, T and T.11, T and T.12, and/or T and T.13.

113. The facts in paragraphs U and U.1, U and U.2, U and U.3, U and U.4, U and U.5, U and U.6, U and U.7, U and U.8, U and U.9, U and U.10, U and U.11, U and U.12, and/or U and U.13.
114. The facts in paragraphs V and V.1, V and V.2, V and V.3, V and V.4, V and V.5, V and V.6, V and V.7, V and V.8, V and V.9, V and V.10, V and V.11, V and V.12, and/or V and V.13.
115. The facts in paragraphs W and W.1, W and W.2, W and W.3, W and W.4, W and W.5, W and W.6, W and W.7, W and W.8, W and W.9, W and W.10, W and W.11, W and W.12, and/or W and W.13.

**ONE HUNDRED SIXTEENTH THROUGH ONE HUNDRED THIRTY-NINTH**

**SPECIFICATIONS**

**PRACTICING THE PROFESSION WITH NEGLIGENCE  
ON MORE THAN ONE OCCASION**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(3)

116. The facts in paragraphs A and A.1, A and A.2, A and A.3, A and A.4, A and A.5, A and A.6, A and A.7, A and A.8, A and A.9, A and A.10, A and A.11, A and A.12, and/or A and A.13.
117. The facts in paragraphs B and B.1, B and B.2, B and B.3, B and B.4, B and B.5, B and B.6, B and B.7, B and B.8, B and B.9, B and B.10, B and B.11, B and B.12, and/or B and B.13.

118. The facts in paragraphs C and C.1, C and C.2, C and C.3, C and C.4, C and C.5, C and C.6, C and C.7, C and C.8, C and C.9, C and C.10, C and C.11, C and C.12, and/or C and C.13.
119. The facts in paragraphs D and D.1, D and D.2, D and D.3, D and D.4, D and D.5, D and D.6, D and D.7, D and D.8, D and D.9, D and D.10, D and D.11, D and D.12, and/or D and D.13.
120. The facts in paragraphs E and E.1, E and E.2, E and E.3, E and E.4, E and E.5, E and E.6, E and E.7, E and E.8, E and E.9, E and E.10, E and E.11, E and E.12, and/or E and E.13.
121. The facts in paragraphs F and F.1, F and F.2, F and F.3, F and F.4, F and F.5, F and F.6, F and F.7, F and F.8, F and F.9, F and F.10, F and F.11, F and F.12, and/or F and F.13.
122. The facts in paragraphs G and G.1, G and G.2, G and G.3, G and G.4, G and G.5, G and G.6, G and G.7, G and G.8, G and G.9, G and G.10, G and G.11, G and G.12, and/or G and G.13.
123. The facts in paragraphs H and H.1, H and H.2, H and H.3, H and H.4, H and H.5, H and H.6, H and H.7, H and H.8, H and H.9, H and H.10, H and H.11, H and H.12, and/or H and H.13.
124. The facts in paragraphs I and I.1, I and I.2, I and I.3, I and I.4, I and I.5, I and I.6, I and I.7, I and I.8, I and I.9, I and I.10, I and I.11, I and I.12, and/or I and I.13.

125. The facts in paragraphs J and J.1, J and J.2, J and J.3, J and J.4, J and J.5, J and J.6, J and J.7, J and J.8, J and J.9, J and J.10, J and J.11, J and J.12, and/or J and J.13.
126. The facts in paragraphs K and K.1, K and K.2, K and K.3, K and K.4, K and K.5, K and K.6, K and K.7, K and K.8, K and K.9, K and K.10, K and K.11, K and K.12, and/or K and K.13.
127. The facts in paragraphs L and L.1, L and L.2, L and L.3, L and L.4, L and L.5, L and L.6, L and L.7, L and L.8, L and L.9, L and L.10, L and L.11, L and L.12, and/or L and L.13.
128. The facts in paragraphs M and M.1, M and M.2, M and M.3, M and M.4, M and M.5, M and M.6, M and M.7, M and M.8, M and M.9, M and M.10, M and M.11, M and M.12, and/or M and M.13.
129. The facts in paragraphs N and N.1, N and N.2, N and N.3, N and N.4, N and N.5, N and N.6, N and N.7, N and N.8, N and N.9, N and N.10, N and N.11, N and N.12, and/or N and N.13.
130. The facts in paragraphs O and O.1, O and O.2, O and O.3, O and O.4, O and O.5, O and O.6, O and O.7, O and O.8, O and O.9, O and O.10, O and O.11, O and O.12, and/or O and O.13.
131. The facts in paragraphs P and P.1, P and P.2, P and P.3, P and P.4, P and P.5, P and P.6, P and P.7, P and P.8, P and P.9, P and P.10, P and P.11, P and P.12, and/or P and P.13.

132. The facts in paragraphs Q and Q.1, Q and Q.2, Q and Q.3, Q and Q.4, Q and Q.5, Q and Q.6, Q and Q.7, Q and Q.8, Q and Q.9, Q and Q.10, Q and Q.11, Q and Q.12, and/or Q and Q.13.
133. The facts in paragraphs R and R.1, R and R.2, R and R.3, R and R.4, R and R.5, R and R.6, R and R.7, R and R.8, R and R.9, R and R.10, R and R.11, R and R.12, and/or R and R.13.
134. The facts in paragraphs S and S.1, S and S.2, S and S.3, S and S.4, S and S.5, S and S.6, S and S.7, S and S.8, S and S.9, S and S.10, S and S.11, S and S.12, and/or S and S.13.
135. The facts in paragraphs T and T.1, T and T.2, T and T.3, T and T.4, T and T.5, T and T.6, T and T.7, T and T.8, T and T.9, T and T.10, T and T.11, T and T.12, and/or T and T.13.
136. The facts in paragraphs U and U.1, U and U.2, U and U.3, U and U.4, U and U.5, U and U.6, U and U.7, U and U.8, U and U.9, U and U.10, U and U.11, U and U.12, and/or U and U.13.
137. The facts in paragraphs V and V.1, V and V.2, V and V.3, V and V.4, V and V.5, V and V.6, V and V.7, V and V.8, V and V.9, V and V.10, V and V.11, V and V.12, and/or V and V.13.
138. The facts in paragraphs W and W.1, W and W.2, W and W.3, W and W.4, W and W.5, W and W.6, W and W.7, W and W.8, W and W.9, W and W.10, W and W.11, W and W.12, and/or W and W.13.
139. The facts in paragraphs X and X.1 and/or Y and Y.1.

## ONE HUNDRED FORTIETH THROUGH ONE HUNDRED SIXTIETH SPECIFICATIONS

### PRACTICING THE PROFESSION WITH GROSS INCOMPETENCE

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(6)

140. The facts in paragraphs A and A.1, A and A.2, A and A.3, A and A.4, A and A.5, A and A.6, A and A.7, A and A.8, A and A.9, A and A.10, A and A.11, A and A.12, and/or A and A.13.
141. The facts in paragraphs B and B.1, B and B.2, B and B.3, B and B.4, B and B.5, B and B.6, B and B.7, B and B.8, B and B.9, B and B.10, B and B.11, B and B.12, and/or B and B.13.
142. The facts in paragraphs C and C.1, C and C.2, C and C.3, C and C.4, C and C.5, C and C.6, C and C.7, C and C.8, C and C.9, C and C.10, C and C.11, C and C.12, and/or C and C.13.
143. The facts in paragraphs D and D.1, D and D.2, D and D.3, D and D.4, D and D.5, D and D.6, D and D.7, D and D.8, D and D.9, D and D.10, D and D.11, D and D.12, and/or D and D.13.
144. The facts in paragraphs E and E.1, E and E.2, E and E.3, E and E.4, E and E.5, E and E.6, E and E.7, E and E.8, E and E.9, E and E.10, E and E.11, E and E.12, and/or E and E.13.
145. The facts in paragraphs F and F.1, F and F.2, F and F.3, F and F.4, F and F.5, F and F.6, F and F.7, F and F.8, F and F.9, F and F.10, F and F.11, F and F.12, and/or F and F.13.

146. The facts in paragraphs G and G.1, G and G.2, G and G.3, G and G.4, G and G.5, G and G.6, G and G.7, G and G.8, G and G.9, G and G.10, G and G.11, G and G.12, and/or G and G.13.
147. The facts in paragraphs H and H.1, H and H.2, H and H.3, H and H.4, H and H.5, H and H.6, H and H.7, H and H.8, H and H.9, H and H.10, H and H.11, H and H.12, and/or H and H.13.
148. The facts in paragraphs I and I.1, I and I.2, I and I.3, I and I.4, I and I.5, I and I.6, I and I.7, I and I.8, I and I.9, I and I.10, I and I.11, I and I.12, and/or I and I.13.
149. The facts in paragraphs J and J.1, J and J.2, J and J.3, J and J.4, J and J.5, J and J.6, J and J.7, J and J.8, J and J.9, J and J.10, J and J.11, J and J.12, and/or J and J.13.
150. The facts in paragraphs K and K.1, K and K.2, K and K.3, K and K.4, K and K.5, K and K.6, K and K.7, K and K.8, K and K.9, K and K.10, K and K.11, K and K.12, and/or K and K.13.
151. The facts in paragraphs L and L.1, L and L.2, L and L.3, L and L.4, L and L.5, L and L.6, L and L.7, L and L.8, L and L.9, L and L.10, L and L.11, L and L.12, and/or L and L.13.
152. The facts in paragraphs M and M.1, M and M.2, M and M.3, M and M.4, M and M.5, M and M.6, M and M.7, M and M.8, M and M.9, M and M.10, M and M.11, M and M.12, and/or M and M.13.

153. The facts in paragraphs N and N.1, N and N.2, N and N.3, N and N.4, N and N.5, N and N.6, N and N.7, N and N.8, N and N.9, N and N.10, N and N.11, N and N.12, and/or N and N.13.
154. The facts in paragraphs O and O.1, O and O.2, O and O.3, O and O.4, O and O.5, O and O.6, O and O.7, O and O.8, O and O.9, O and O.10, O and O.11, O and O.12, and/or O and O.13.
155. The facts in paragraphs P and P.1, P and P.2, P and P.3, P and P.4, P and P.5, P and P.6, P and P.7, P and P.8, P and P.9, P and P.10, P and P.11, P and P.12, and/or P and P.13.
156. The facts in paragraphs Q and Q.1, Q and Q.2, Q and Q.3, Q and Q.4, Q and Q.5, Q and Q.6, Q and Q.7, Q and Q.8, Q and Q.9, Q and Q.10, Q and Q.11, Q and Q.12, and/or Q and Q.13.
157. The facts in paragraphs R and R.1, R and R.2, R and R.3, R and R.4, R and R.5, R and R.6, R and R.7, R and R.8, R and R.9, R and R.10, R and R.11, R and R.12, and/or R and R.13.
158. The facts in paragraphs S and S.1, S and S.2, S and S.3, S and S.4, S and S.5, S and S.6, S and S.7, S and S.8, S and S.9, S and S.10, S and S.11, S and S.12, and/or S and S.13.
159. The facts in paragraphs T and T.1, T and T.2, T and T.3, T and T.4, T and T.5, T and T.6, T and T.7, T and T.8, T and T.9, T and T.10, T and T.11, T and T.12, and/or T and T.13.

160. The facts in paragraphs U and U.1, U and U.2, U and U.3, U and U.4, U and U.5, U and U.6, U and U.7, U and U.8, U and U.9, U and U.10, U and U.11, U and U.12, and/or U and U.13.
161. The facts in paragraphs V and V.1, V and V.2, V and V.3, V and V.4, V and V.5, V and V.6, V and V.7, V and V.8, V and V.9, V and V.10, V and V.11, V and V.12, and/or V and V.13.
162. The facts in paragraphs W and W.1, W and W.2, W and W.3, W and W.4, W and W.5, W and W.6, W and W.7, W and W.8, W and W.9, W and W.10, W and W.11, W and W.12, and/or W and W.13.

**ONE HUNDRED SIXTY-THIRD THROUGH**

**ONE HUNDRED EIGHTY-SIXTH SPECIFICATIONS**

**PRACTICNG THE PROFESSION WITH INCOMPETENCE  
ON MORE THAN ONE OCCASION**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(5)

163. The facts in paragraphs A and A.1, A and A.2, A and A.3, A and A.4, A and A.5, A and A.6, A and A.7, A and A.8, A and A.9, A and A.10, A and A.11, A and A.12, and/or A and A.13.
164. The facts in paragraphs B and B.1, B and B.2, B and B.3, B and B.4, B and B.5, B and B.6, B and B.7, B and B.8, B and B.9, B and B.10, B and B.11, B and B.12, and/or B and B.13.

165. The facts in paragraphs C and C.1, C and C.2, C and C.3, C and C.4, C and C.5, C and C.6, C and C.7, C and C.8, C and C.9, C and C.10, C and C.11, C and C.12, and/or C and C.13.
166. The facts in paragraphs D and D.1, D and D.2, D and D.3, D and D.4, D and D.5, D and D.6, D and D.7, D and D.8, D and D.9, D and D.10, D and D.11, D and D.12, and/or D and D.13.
167. The facts in paragraphs E and E.1, E and E.2, E and E.3, E and E.4, E and E.5, E and E.6, E and E.7, E and E.8, E and E.9, E and E.10, E and E.11, E and E.12, and/or E and E.13.
168. The facts in paragraphs F and F.1, F and F.2, F and F.3, F and F.4, F and F.5, F and F.6, F and F.7, F and F.8, F and F.9, F and F.10, F and F.11, F and F.12, and/or F and F.13.
169. The facts in paragraphs G and G.1, G and G.2, G and G.3, G and G.4, G and G.5, G and G.6, G and G.7, G and G.8, G and G.9, G and G.10, G and G.11, G and G.12, and/or G and G.13.
170. The facts in paragraphs H and H.1, H and H.2, H and H.3, H and H.4, H and H.5, H and H.6, H and H.7, H and H.8, H and H.9, H and H.10, H and H.11, H and H.12, and/or H and H.13.
171. The facts in paragraphs I and I.1, I and I.2, I and I.3, I and I.4, I and I.5, I and I.6, I and I.7, I and I.8, I and I.9, I and I.10, I and I.11, I and I.12, and/or I and I.13.

172. The facts in paragraphs J and J.1, J and J.2, J and J.3, J and J.4, J and J.5, J and J.6, J and J.7, J and J.8, J and J.9, J and J.10, J and J.11, J and J.12, and/or J and J.13.
173. The facts in paragraphs K and K.1, K and K.2, K and K.3, K and K.4, K and K.5, K and K.6, K and K.7, K and K.8, K and K.9, K and K.10, K and K.11, K and K.12, and/or K and K.13.
174. The facts in paragraphs L and L.1, L and L.2, L and L.3, L and L.4, L and L.5, L and L.6, L and L.7, L and L.8, L and L.9, L and L.10, L and L.11, L and L.12, and/or L and L.13.
175. The facts in paragraphs M and M.1, M and M.2, M and M.3, M and M.4, M and M.5, M and M.6, M and M.7, M and M.8, M and M.9, M and M.10, M and M.11, M and M.12, and/or M and M.13.
176. The facts in paragraphs N and N.1, N and N.2, N and N.3, N and N.4, N and N.5, N and N.6, N and N.7, N and N.8, N and N.9, N and N.10, N and N.11, N and N.12, and/or N and N.13.
177. The facts in paragraphs O and O.1, O and O.2, O and O.3, O and O.4, O and O.5, O and O.6, O and O.7, O and O.8, O and O.9, O and O.10, O and O.11, O and O.12, and/or O and O.13.
178. The facts in paragraphs P and P.1, P and P.2, P and P.3, P and P.4, P and P.5, P and P.6, P and P.7, P and P.8, P and P.9, P and P.10, P and P.11, P and P.12, and/or P and P.13.

179. The facts in paragraphs Q and Q.1, Q and Q.2, Q and Q.3, Q and Q.4, Q and Q.5, Q and Q.6, Q and Q.7, Q and Q.8, Q and Q.9, Q and Q.10, Q and Q.11, Q and Q.12, and/or Q and Q.13.
180. The facts in paragraphs R and R.1, R and R.2, R and R.3, R and R.4, R and R.5, R and R.6, R and R.7, R and R.8, R and R.9, R and R.10, R and R.11, R and R.12, and/or R and R.13.
181. The facts in paragraphs S and S.1, S and S.2, S and S.3, S and S.4, S and S.5, S and S.6, S and S.7, S and S.8, S and S.9, S and S.10, S and S.11, S and S.12, and/or S and S.13.
182. The facts in paragraphs T and T.1, T and T.2, T and T.3, T and T.4, T and T.5, T and T.6, T and T.7, T and T.8, T and T.9, T and T.10, T and T.11, T and T.12, and/or T and T.13.
183. The facts in paragraphs U and U.1, U and U.2, U and U.3, U and U.4, U and U.5, U and U.6, U and U.7, U and U.8, U and U.9, U and U.10, U and U.11, U and U.12, and/or U and U.13.
184. The facts in paragraphs V and V.1, V and V.2, V and V.3, V and V.4, V and V.5, V and V.6, V and V.7, V and V.8, V and V.9, V and V.10, V and V.11, V and V.12, and/or V and V.13.
185. The facts in paragraphs W and W.1, W and W.2, W and W.3, W and W.4, W and W.5, W and W.6, W and W.7, W and W.8, W and W.9, W and W.10, W and W.11, W and W.12, and/or W and W.13.
186. The facts in paragraphs X and X.1, and/or Y and Y.1.

**ONE HUNDRED EIGHTY-SEVENTH THROUGH  
TWO HUNDRED NINTH SPECIFICATIONS**

**EXERCISING UNDUE INFLUENCE ON A PATIENT**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(17)

187. The facts in paragraphs A and A.5, A and A.6, and/or A and A.7.
188. The facts in paragraphs B and B.5, B and B.6, and/or B and B.7.
189. The facts in paragraphs C and C.5, C and C.6, and/or C and C.7.
190. The facts in paragraphs D and D.5, D and D.6, and/or D and D.7.
191. The facts in paragraphs E and E.5, E and E.6, and/or E and E.7.
192. The facts in paragraphs F and F.5, F and F.6, and/or F and F.7.
193. The facts in paragraphs G and G.5, G and G.6, and/or G and G.7.
194. The facts in paragraphs H and H.5, H and H.6, and/or H and H.7.
195. The facts in paragraphs I and I.5, I and I.6, and/or I and I.7.
196. The facts in paragraphs J and J.5, J and J.6, and/or J and J.7.
197. The facts in paragraphs K and K.5, K and K.6, and/or K and K.7.
198. The facts in paragraphs L and L.5, L and L.6, and/or L and L.7.
199. The facts in paragraphs M and M.5, M and M.6, and/or M and M.7.
200. The facts in paragraphs N and N.5, N and N.6, and/or N and N.7.
201. The facts in paragraphs O and O.5, O and O.6, and/or O and O.7.
202. The facts in paragraphs P and P.5, P and P.6, and/or P and P.7.

203. The facts in paragraphs Q and Q.5, Q and Q.6, and/or Q and Q.7.
204. The facts in paragraphs R and R.5, R and R.6, and/or R and R.7.
205. The facts in paragraphs S and S.5, S and S.6, and/or S and S.7.
206. The facts in paragraphs T and T.5, T and T.6, and/or T and T.7.
207. The facts in paragraphs U and U.5, U and U.6, and/or U and U.7.
208. The facts in paragraphs V and V.5, V and V.6, and/or V and V.7.
209. The facts in paragraphs W and W.5, W and W.6, and/or W and W.7.

**TWO HUNDRED TENTH SPECIFICATION**

**WILLFULLY FAILING TO FILE A REPORT REQUIRED BY LAW**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(21)

210. The facts in paragraphs Z and Z.1, and/or Z and Z.2.

**TWO HUNDRED ELEVENTH SPECIFICATION**

**WILLFULLY OR GROSSLY FAILING TO COMPLY WITH  
FEDERAL, STATE, OR LOCAL LAWS RULES OR  
REGULATIONS GOVERNING THE PRACTICE OF MEDICINE**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(16)

211. The facts in paragraphs Z and Z.1, Z and Z.2, and/or Z and Z.3.

**TWO HUNDRED TWELFTH THROUGH  
TWO HUNDRED THIRTY-FOURTH SPECIFICATIONS**

**PERFORMING PROFESSIONAL SERVICES WHICH  
HAVE NOT BEEN AUTHORIZED BY THE PATIENT**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(26)

212. The facts in paragraphs A and A.3, and/or A and A.7.
213. The facts in paragraphs B and B.3, and/or B and B.7.
214. The facts in paragraphs C and C.3, and/or C and C.7.
215. The facts in paragraphs D and D.3, and/or D and D.7.
216. The facts in paragraphs E and E.3, and/or E and E.7.
217. The facts in paragraphs F and F.3, and/or F and F.7.
218. The facts in paragraphs G and G.3, and/or G and G.7.
219. The facts in paragraphs H and H.3, and/or H and H.7.
220. The facts in paragraphs I and I.3, and/or I and I.7.
221. The facts in paragraphs J and J.3, and/or J and J.7.

- 222. The facts in paragraphs K and K.3, and/or K and K.7.
- 223. The facts in paragraphs L and L.3, and/or L and L.7.
- 224. The facts in paragraphs M and M.3, and/or M and M.7.
- 225. The facts in paragraphs N and N.3, and/or N and N.7.
- 226. The facts in paragraphs O and O.3, and/or O and O.7.
- 227. The facts in paragraphs P and P.3, and/or P and P.7.
- 228. The facts in paragraphs Q and Q.3, and/or Q and Q.7
- 229. The facts in paragraphs R and R.3, and/or R and R.7.
- 230. The facts in paragraphs S and S.3, and/or S and S.7.
- 231. The facts in paragraphs T and T.3, and/or T and T.7.
- 232. The facts in paragraphs U and U.3, and/or U and U.7.
- 233. The facts in paragraphs V and V.3, and/or V and V.7.
- 234. The facts in paragraphs W and W.3, and/or W and W.7.

**TWO HUNDRED THIRTY-FIFTH THROUGH  
TWO HUNDRED FIFTY-EIGHTH SPECIFICATIONS**

**FAILING TO MAINTAIN RECORDS**

Respondent is charged with committing professional misconduct as defined by New York Education Law §6530(32)

- 235. The facts in paragraphs A and A.13.
- 236. The facts in paragraphs B and B.13.

237. The facts in paragraphs C and C.13.
238. The facts in paragraphs D and D.13.
239. The facts in paragraphs E and E.13.
240. The facts in paragraphs F and F.13.
241. The facts in paragraphs G and G.13.
242. The facts in paragraphs H and H.13.
243. The facts in paragraphs I and I.13.
244. The facts in paragraphs J and J.13.
245. The facts in paragraphs K and K.13.
246. The facts in paragraphs L and L.13.
247. The facts in paragraphs M and M.13.
248. The facts in paragraphs N and N.13.
249. The facts in paragraphs O and O.13.
250. The facts in paragraphs P and P.13.
251. The facts in paragraphs Q and Q.13.
252. The facts in paragraphs R and R.13.
253. The facts in paragraphs S and S.13.
254. The facts in paragraphs T and T.13.
255. The facts in paragraphs U and U.13.
256. The facts in paragraphs V and V.13.
257. The facts in paragraphs W and W.13.
258. The facts in paragraphs X and X.1, and/or Y and Y.1.

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Albany, New York

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MICHAEL A. HISER, ESQ.  
Deputy Counsel  
Bureau of Professional Medical Conduct