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OHIO VETERINARY MEDICAL
LICENSING BOARD

BEFORE THE OHIO VETERINARY
MEDICAL LICENSING BOARD

OHIO VETERINARY MEDICAL
LICENSING BOARD,

Appellant

v.

WILLIAM CLARK, D.V.M.,

Appellee

Case No. 13-13-041

SETTLEMENT AGREEMENT

1. This agreement is made between William Clark, D.V.M., and the Ohio Veterinary Medical Licensing Board.

2. The above parties hereby stipulate to the jurisdiction of the Ohio Veterinary Medical Licensing Board over this matter.

3. This agreement is made as a compromise between the parties for the complete and final settlement of their claims, differences, and causes of action arising out of, connected with or in any manner related to all matters referred to in the Notice of Opportunity for Hearing letter, dated August, 2013.

4. The parties agree that the terms of this settlement agreement are a compromise and that the settlement agreement binds the parties hereto, their assigns and successors in interest.

5. As a result of an investigation conducted by the Board, Dr. Clark was notified by a Notice of Opportunity for Hearing letter, dated August, 2013, that the Board intended to determine whether or not to reprimand, revoke or suspend his license to practice veterinary medicine in Ohio based upon the allegations that he had violated R.C. 4741.22(A) and (U); and, O.A.C. 4741-1-10.

6. Based upon the foregoing, as a full and complete settlement of this matter and in the mutual best interests of the parties, Dr. Clark and the Board hereby agree to the following settlement of Case No. 13-13-041:

- a. Dr. Clark waives his right to an appeal and an opportunity to be heard pursuant to Chapter 119 of the Ohio Revised Code and specifically withdraws his request for a hearing in this matter.
- b. Dr. Clark shall pay a fine of \$750.00 within thirty (30) days of the effective date of the Settlement Agreement by money order or certified check made payable to the Treasurer, State of Ohio.
- c. Dr. Clark agrees to take and complete a course on record keeping, and another course on analgesic dosing, within six (6) months of the effective date of this settlement agreement. These courses may be a computer course or a classroom course.
- d. Dr. Clark shall pay the costs of investigation of \$254.00 within thirty (30) days of the effective date of the Settlement Agreement by money order or certified check made payable to the Treasurer, State of Ohio.
- e. Dr. Clark shall submit ten (10) medical records quarterly to the Board for one year; a total of forty (40) records.

7. It is hereby understood that this agreement and the facts stipulated herein shall not be binding on any of the parties unless it has been signed and executed by the parties below. If the parties are unable to reach an agreement on the

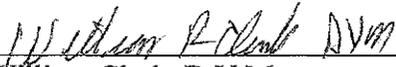
terms herein, this document shall become null and void and without any force or effect.

8. Dr. Clark waives any and all claims or causes of actions he may have against the State of Ohio, the Ohio Veterinary Medical Licensing Board and its members, officers, employees and/or agents of either, arising out of the matters which are the subject of this settlement agreement.

9. If the Board determines that Dr. Clark has violated any term(s) in Subsection 6 above, the Board by certified mail will give Dr. Clark notice of the violation of this agreement. If, thirty days from receipt of the certified letter, Dr. Clark does not comply with the term(s) violated, the Board may suspend or revoke Dr. Clark's veterinary medical license for a period determined by the Board. Dr. Clark hereby knowingly and voluntarily waives his right to an appeal and an opportunity to be heard pursuant to Chapter 119 of the Ohio Revised Code as to any suspension or revocation invoked by the Board for a violation of the term(s) of which he was notified.

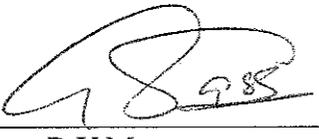
10. The medical records submitted to the Board per the terms in Subsection 6 above will be reviewed by the Board for compliance with O.A.C. 4741-1-21. It is understood by Dr, Clark that if these records demonstrate a quality of care issue the provider could be subject to further disciplinary action by the Board.

11. This document shall be considered a public record in accordance with Revised Code Section 149.43 and shall be released by the Board only if requested and only if required by law.



William Clark, D.V.M.

Date: 9/4/13



Gurda Dass, D.V.M.
President
Ohio Veterinary Medical Board

Date: 10/9/13