



*New York State Board for Professional Medical Conduct*

*433 River Street, Suite 303 Troy, New York 12180-2299 • (518) 402-0863*

Dennis P. Whalen  
*Executive Deputy Commissioner of Health*  
Anne F. Saille, Director  
*Office of Professional Medical Conduct*  
William J. Comiskey, Chief Counsel  
*Bureau of Professional Medical Conduct*

William P. Dillon, M.D.  
*Chair*  
Denise M. Bolan, R.P.A.  
*Vice Chair*  
Ansel R. Marks, M.D., J.D.  
*Executive Secretary*

February 10, 1999

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Aysa Gosin, M.D.  
2214 64th Street  
Brooklyn, New York 11204

RE: License No. 154873

Dear Dr. Gosin:

Enclosed please find Order #BPMC 99-32 of the New York State Board for Professional Medical Conduct. This Order and any penalty provided therein goes into effect **February 17, 1999**.

If the penalty imposed by the Order is a surrender, revocation or suspension of this license, you are required to deliver to the Board the license and registration within five (5) days of receipt of the Order.

Board for Professional Medical Conduct  
New York State Department of Health  
Hedley Park Place, Suite 303  
433 River Street  
Troy, New York 12180

If the penalty imposed by the Order is a fine, please write the check payable to the New York State Department of Health. Noting the BPMC Order number on your remittance will assist in proper crediting. Payments should be directed to the following address:

Bureau of Accounts Management  
New York State Department of Health  
Corning Tower, Room 1315  
Empire State Plaza  
Albany, New York 12237

Sincerely,



Ansel R. Marks, M.D., J.D.  
Executive Secretary  
Board for Professional Medical Conduct

Enclosure

cc: Jeffrey J. Sherrin, Esq.  
74 North Pearl Street  
Albany, New York 12207-2721

Kevin C. Roe, Esq.

STATE OF NEW YORK : DEPARTMENT OF HEALTH  
STATE BOARD FOR PROFESSIONAL MEDICAL CONDUCT

-----X

IN THE MATTER	:	SURRENDER
OF	:	ORDER
AYSA GOSIN, M.D.	:	BPMC # 99-32

-----X

AYSA GOSIN, M.D., says:

On or about August 8, 1983, I was licensed to practice medicine as a physician in the State of New York having been issued License No. 154873 by the New York State Education Department.

I understand that I have been charged with two hundred twenty-seven specifications of professional misconduct as set forth in the Statement of Charges, annexed hereto, made a part hereof, and marked as Exhibit A.

I am applying to the State Board for Professional Medical Conduct for an agreement to allow me to surrender my license as a physician in the State of New York and request that the Board issue this Surrender Order.

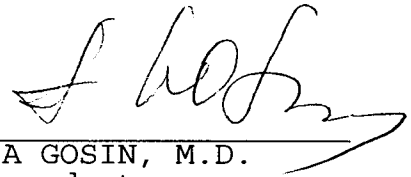
I do not contest the twenty-sixth, twenty-seventh, twenty-eighth, thirty-first, thirty-third, thirty-fifth, sixty-ninth, seventieth, and seventy-eighth specifications set forth in the Statement of Charges. In addition to this surrender, I agree to pay a fine of ten thousand dollars (\$10,000.00) payable in four

equal installments of two thousand five hundred dollars (\$2,500.00) on or before March 1, 1999, on or before June 30, 1999, on or before September 30, 1999, and on or before December 30, 1999. Failure to pay any installment on or before the due date shall make the entire remaining fine due and payable immediately. I further agree to a limitation against the issuance of any further license to me pursuant to N.Y. Public Health Law §230-a(6) and agree not to apply for relicensure in New York state.

I understand that, in the event that this proposed agreement is not granted by the State Board for Professional Medical Conduct, nothing contained herein shall be binding upon me or construed to be an admission of any act of misconduct alleged or charged against me, such proposed agreement shall not be used against me in any way, and shall be kept in strict confidence during the pendency of the professional misconduct disciplinary proceeding; and such denial by the State Board for Professional Medical Conduct shall be made without prejudice to the continuance of any disciplinary proceeding and the final determination by a Committee on Professional Medical Conduct pursuant to the provisions of the Public Health Law.

I agree that in the event the State Board for Professional Medical Conduct agrees with my proposal, this Order shall be issued striking my name from the roster of physicians in the State of New York without further notice to me.

I am making this agreement of my own free will and accord and not under duress, compulsion, or restraint of any kind or manner.



AYSA GOSIN, M.D.  
Respondent

Subscribed before me this  
26<sup>th</sup> day of JANUARY, 1999


  
NOTARY PUBLIC

My commission expires:

HARDAT DYAL  
Notary Public, State of New York  
No. 01DY6006785  
Qualified in Bronx County  
Commission Expires May 4, 2000

AGREED TO:


Date: 2/1, 1999

  
\_\_\_\_\_  
KEVIN C. ROE  
Associate Counsel  
Bureau of Professional  
Medical Conduct

Date: 1/28, 1999

  
\_\_\_\_\_  
JEFFREY SHERRIN, ESQ.  
Attorney for Respondent

Date: Feb 2, 1999

  
\_\_\_\_\_  
ANNE F. SAILE  
Director  
Office of Professional  
Medical Conduct

ORDER

Upon the proposed agreement of AYSA GOSIN, M.D., to surrender her license as a physician in the State of New York, which proposed agreement is made a part hereof, it is agreed to and

ORDERED, that the proposed agreement and the provisions thereof are hereby adopted; it is further

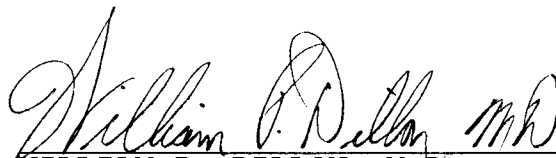
ORDERED, that the name of Respondent be stricken from the roster of physicians in the State of New York; it is further

ORDERED, that the Respondent is limited from any further license pursuant to N.Y. Public Health Law §230-a(6), it is further

ORDERED, that this Order shall take effect as of the date of the personal service of this Order upon Respondent, upon receipt by Respondent of this Order via certified mail, or seven days after mailing of this Order via certified mail, whichever is earliest.

DATED: \_\_\_\_\_

2/4/99



WILLIAM P. DILLON, M.D.  
Chair  
State Board for Professional  
Medical Conduct

# Exhibit A

STATE OF NEW YORK : DEPARTMENT OF HEALTH  
STATE BOARD FOR PROFESSIONAL MEDICAL CONDUCT

-----X

IN THE MATTER : STATEMENT  
OF : OF  
ASYA GOSIN, M.D. : CHARGES

-----X

ASYA GOSIN, M.D., the Respondent, was authorized to practice medicine in New York State on August 8, 1983, by the issuance of license number 154873 by the New York State Education Department.

## FACTUAL ALLEGATIONS

A. Respondent treated Patient A (patients are identified in the attached appendix) from on or about August, 1995, to on or about April, 1997, at her office, 2214 64th Street, Brooklyn, New York for gynecological complaints. Respondent's care and treatment of Patient A failed to meet acceptable standards of medical care, in that:

1. On or about August 24, 1995, Respondent ordered and/or performed an abdominal ultrasound without adequate medical justification.
2. On or about July 25, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
3. On or about July 25, 1996, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.



4. On or about July 25, 1996, Respondent ordered and/or performed a renal sonogram without adequate medical justification.
5. On or about July 25, 1996, Respondent failed to order and/or perform uterine sampling procedures.
6. On or about April 5, 1997, Respondent failed to order and/or perform uterine sampling procedures.

B. Respondent treated Patient B from January 18, 1996, to September 24, 1996, at her office. Respondent's care and treatment of Patient B failed to meet acceptable standards of medical care, in that:

1. On or about January 18, 1996, Respondent failed to perform and/or record an adequate physical examination.
2. On or about January 18, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
3. On or about January 18, 1996, Respondent ordered and/or performed a vulvar sonogram without adequate medical justification.
4. On or about January 18, 1996, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
5. On or about May 29, 1996, Respondent failed to order and/or perform urinalysis and cultures.
6. On or about May 29, 1996, Respondent ordered and/or performed a breast sonogram without adequate medical justification.
7. On or about May 29, 1996, Respondent ordered and/or performed a renal sonogram without adequate medical justification.
8. On or about September 24, 1996, Respondent ordered and/or performed a breast sonogram without adequate medical justification.
9. On or about March 6, 1997, Respondent failed to

perform and/or record an adequate physical examination.

C. Respondent treated Patient C from July 29, 1995, to March 22, 1997 at her office. Respondent's care and treatment of Patient C failed to meet acceptable standards of medical care, in that:

1. On or about August 21, 1995, Respondent ordered and/or performed a breast sonogram without adequate medical justification.
2. On or about August 21, 1995, Respondent ordered and/or performed a vulvar sonogram without adequate medical justification.
3. On or about September 26, 1995, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
4. On or about May 4, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
5. On or about July 13, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
6. On or about May 22, 1997, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
7. On or about May 4, 1996, Respondent ordered and/or performed a renal sonogram without adequate medical justification.
8. On or about July 29, 1996, Respondent ordered and/or performed an abdominal ultrasound without adequate medical justification.
9. Respondent failed to adequately evaluate and/or follow-up sonographic findings of an enlarged liver on or about July 29, 1996.

D. Respondent treated Patient D from May 18,

1995, to July 15, 1996, at her office. Respondent's care and treatment of Patient D failed to meet acceptable standards of medical care, in that:

1. On or about May 18, 1995, Respondent failed to perform and/or record an adequate physical examination.
2. On or about May 18, 1995, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
3. On or about July 29, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
4. On or about October 31, 1995, Respondent failed to perform and/or adequately record a wet smear.
5. On or about April 14, 1996, Respondent failed to order and/or perform urinalysis
6. On or about April 14, 1996, Respondent ordered and/or performed an renal sonogram without adequate medical justification.
7. On or about July 15, 1996, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
8. On or about July 15, 1996, Respondent ordered and/or performed a renal sonogram without adequate medical justification.
9. On or about July 15, 1996, Respondent failed to order and/or perform uterine sampling procedures.

E. Respondent treated Patient E from July 19, 1994, to December 27, 1995, at her office. Respondent's care and treatment of Patient E failed to meet acceptable standards of medical care in that:

1. On or about July 19, 1994, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.

2. On or about February 18, 1995, Respondent diagnosed PID without adequate medical justification.
3. On or about February 18, 1995, Respondent failed to order and/or obtain cervical cultures.
4. On or about February 18, 1995, Respondent prescribed Cipro without adequate medical justification.
5. On or about February 18, 1995, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
6. On or about February 18, 1995, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
7. On or about November 18, 1995, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
8. On or about November 18, 1994, Respondent ordered and/or performed a breast sonogram without adequate medical justification.
9. On or about December 2, 1995 Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
10. On or about December 27, 1995 Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.

F. Respondent treated Patient F from September 12, 1995, to February 14, 1998, at her office. Respondent's care and treatment of Patient F failed to meet acceptable standards of medical care, in that:

1. On or about September 12, 1995, Respondent failed to perform and/or record an adequate physical examination.
2. On or about September 12, 1995, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
3. On or about September 12, 1995, Respondent

ordered and/or performed a vulvar sonogram without adequate medical justification.

4. On or about September 12, 1995, Respondent failed to order and/or perform urinalysis or IVP to evaluate renal colic.
5. On or about May 23, 1996, Respondent ordered and/or performed a renal sonogram without adequate medical justification.
6. On or about May 23, 1996, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
7. On or about May 23, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
8. On or about May 23, 1996, Respondent prescribed Anaprox without adequate medical justification.
9. On or about March 17, 1997, Respondent ordered and/or performed a renal sonogram without adequate medical justification.
10. On or about March 17, 1997, Respondent failed to order and/or perform urinalysis or IVP to evaluate left side pain.
11. On or about August 14, 1997, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
12. On or about August 14, 1997, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
13. On or about February 14, 1998, Respondent ordered and/or performed blood tests for FSH and LH without adequate medical justification.

G. Respondent treated Patient G from April 2, 1995, to January 4, 1997, at her office. Respondent's care and treatment of Patient G failed to meet acceptable standards of medical care, in that:

1. On or about April 2, 1994, Respondent ordered and/or performed a renal sonogram without adequate

medical justification.

2. On or about October 1, 1994, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
3. On or about April 28, 1995, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
4. On or about April 28, 1995, Respondent failed to adequately evaluate and treat gall stones.
5. On or about January 6, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
6. On or about January 6, 1996, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
7. On or about August 3, 1996, Respondent ordered and/or performed a renal sonogram without adequate medical justification.
8. On or about August 3, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
9. On or about August 3, 1996, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
10. On or about January 4, 1997, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
11. On or about January 4, 1997, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.

H. Respondent treated Patient H from on or about May 27, 1993, to January 29, 1998, at her office. Respondent's care and treatment of Patient H failed to meet acceptable standards of medical care, in that:

1. On or about May 27, 1993, Respondent ordered and/or performed an abdominal sonogram without

adequate medical justification.

2. On or about February 3, 1994, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
3. On or about January 9, 1995, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
4. On or about January 9, 1995, Respondent ordered and/or performed a renal sonogram without adequate medical justification.
5. On or about May 15, 1995, Respondent ordered and/or performed a transvaginal sonogram without adequate medical justification.
6. On or about January 13, 1996, Respondent ordered and/or performed a vulvar sonogram without adequate medical justification.
7. On or about February 1, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
8. On or about February 1, 1996, Respondent ordered and/or performed a breast sonogram without adequate medical justification.
9. On or about February 1, 1996, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
10. On or about April 25, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
11. On or about April 25, 1996, Respondent ordered and/or performed a renal sonogram without adequate medical justification.
12. On or about April 17, 1997, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
13. On or about April 17, 1997, Respondent ordered and/or performed a renal sonogram without adequate medical justification.
14. On or about April 17, 1997, Respondent ordered and/or performed a breast sonogram without adequate medical justification.
15. On or about January 29, 1998, Respondent ordered and/or performed a pelvic sonogram without

adequate medical justification.

16. On or about January 29, 1998, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.

I. Respondent treated Patient I from July 25, 1995, to August 17, 1996, at her office. Respondent's care and treatment of Patient I failed to meet acceptable standards of medical care in that:

1. On or about July 29, 1995, Respondent failed to perform and/or record an adequate physical exam.
2. On or about July 29, 1995, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
3. On or about July 29, 1995, Respondent diagnosed PID without adequate medical justification.
4. On or about July 29, 1995, Respondent prescribed Cipro without adequate medical justification.
5. On or about September 9, 1995, Respondent submitted a claim for a vulvar sonogram that was not performed.
6. On or about October 7, 1995, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
7. On or about April 25, 1996, Respondent failed to perform and/or adequately report the results of a wet smear test.
8. On or about July 8, 1996, Respondent failed to order and/or perform urinalysis and urine cultures.
9. On or about July 8, 1996, Respondent prescribed Provera without adequate medical justification.
10. On or about July 8, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.
11. On or about August 17, 1996, Respondent ordered



and/or performed a renal sonogram without adequate medical justification.

12. On or about August 17, 1996, Respondent ordered and/or performed an abdominal sonogram without adequate medical justification.
13. On or about August 17, 1996, Respondent ordered and/or performed a pelvic sonogram without adequate medical justification.

#### SPECIFICATIONS

#### FIRST THROUGH NINTH SPECIFICATIONS GROSS NEGLIGENCE

Respondent is charged with gross negligence in violation of New York Education Law §6530(4) in that, Petitioner charges:

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

7. The facts in Paragraphs G and G.1, G.2, G.3, G.4, G.5, G.6, G.7, G.8, G.9, G.10, and/or G.11.
8. The facts in Paragraphs H and H.1, H.2, H.3, H.4, H.5, H.6, H.7, H.8, H.9, H.10, H.11, H.12, H.13, H.14, H.15, and/or H.16.
9. The facts in Paragraphs I and I.1, I.2, I.3, I.4, I.5, I.6, I.7, I.8, I.9, I.10, I.11, I.12, and/or I.13.

**TENTH THROUGH EIGHTEENTH SPECIFICATIONS**  
**GROSS INCOMPETENCE**

Respondent is charged with gross incompetence in violation of New York Education Law §6530(6) in that, Petitioner charges:

10. The facts in Paragraphs A and A.1, A.2, A.3, A.4., A.5 and/or A.6.
11. The facts in Paragraphs B and B.1, B.2, B.3, B.4, B.5, B.6, B.7, B.8, and/or B.9.
12. The facts in Paragraphs C and C.1, C.2, C.3, C.4, C.5, C.6, C.7, C.8, and/or C.9.
13. The facts in Paragraphs D and D.1, D.2, D.3, D.4, D.5, D.6, D.7, D.8, and/or D.9.
14. The facts in Paragraphs E and E.1, E.2, E.3, E.4, E.5, E.6, E.7, E.8, F.9, and/or E.10.
15. The facts in Paragraphs F and F.1, F.2, F.3, F.4, F.5, F.6, F.7, F.8, F.9, F.10, F.11, F.12, and/or F.13.
16. The facts in Paragraphs G and G.1, G.2, G.3, G.4, G.5, G.6, G.7, G.8, G.9, G.10, and/or G.11.
17. The facts in Paragraphs H and H.1, H.2, H.3, H.4, H.5, H.6, H.7, H.8, H.9, H.10, H.11, H.12, H.13, H.14, H.15, and/or H.16.
18. The facts in Paragraphs I and I.1, I.2, I.3, I.4,

I.5, I.6, I.7, I.8, I.9, I.10, I.11, I.12, and/or I.13.

**NINETEENTH SPECIFICATION**

**NEGLIGENCE ON MORE THAN ONE OCCASION**

Respondent is charged with negligence on more than one occasion in violation of New York Education Law §6530(3) in that, Petitioner charges two or more of the following:

19. The facts in Paragraphs A and A.1, A.2, A.3, A.4, A.5, A.6; B and B.1, B.2, B.3, B.4, B.5, B.6, B.7, B.8, B.9; C and C.1, C.2, C.3, C.4, C.5, C.6, C.7, C.8, C.9; D and D.1, D.2, D.3, D.4, D.5, D.6, D.7, D.8, D.9; E and E.1, E.2, E.3, E.4, E.5, E.6, E.6, E.7, E.8, E.9, E.10; F and F.1, F.2, F.3, F.4, F.5, F.6, F.7, F.8, F.9, F.10, F.11, F.12, F.13; G and G.1, G.2, G.3, G.4, G.5, G.6, G.7, G.8, G.9, G.10, G.11; H and H.1, H.2, H.3, H.4, H.5, H.6, H.7, H.8, H.9, H.10, H.11, H.12, H.13, H.14, H.15, H.16; I and I.1, I.2, I.3, I.4, I.5, I.6, I.7, I.8, I.9, I.10, I.11, I.12, I.13.

**TWENTY FOURTH SPECIFICATION**

**INCOMPETENCE ON MORE THAN ONE OCCASION**

Respondent is charged with incompetence on more than one occasion in violation of New York Education Law §6530(5) in that, Petitioner charges two or more of the following:

20. The facts in Paragraphs A and A.1, A.2, A.3, A.4, A.5, A.6; B and B.1, B.2, B.3, B.4, B.5, B.6, B.7, B.8, B.9; C and C.1, C.2, C.3, C.4, C.5, C.6, C.7, C.8, C.9; D and D.1, D.2, D.3, D.4, D.5, D.6, D.7, D.8, D.9; E and E.1, E.2, E.3, E.4, E.5, E.6, E.6, E.7, E.8, E.9, E.10; F and F.1, F.2, F.3, F.4, F.5, F.6, F.7, F.8, F.9, F.10, F.11, F.12, F.13; G and G.1, G.2, G.3, G.4, G.5, G.6, G.7, G.8, G.9,

G.10, G.11; H and H.1, H.2, H.3, H.4, H.5, H.6, H.7, H.8, H.9, H.10, H.11, H.12, H.13, H.14, H.15, H.16; I and I.1, I.2, I.3, I.4, I.5, I.6, I.7, I.8, I.9, I.10, I.11, I.12, I.13.

**TWENTY-FIRST THROUGH EIGHTY-NINTH SPECIFICATIONS**

**EXCESSIVE TESTS OR TREATMENT**

Respondent is charged with ordering excessive tests or treatment not warranted by the condition of the patient in violation of N.Y. Education Law §6530(35) in that, Petitioner charges:

21. The facts in Paragraphs A and A.1.
22. The facts in Paragraphs A and A.2.
23. The facts in Paragraphs A and A.3.
24. The facts in Paragraphs A and A.4.
25. The facts in Paragraphs B and B.2.
26. The facts in Paragraphs B and B.3.
27. The facts in Paragraphs B and B.6.
28. The facts in Paragraphs B and B.7.
29. The facts in Paragraphs B and C.7.
30. The facts in Paragraphs C and C.8.
31. The facts in Paragraphs D and D.2.
32. The facts in Paragraphs D and D.3.
33. The facts in Paragraphs D and D.6.
34. The facts in Paragraphs D and D.7.
35. The facts in Paragraphs D and D.8.
36. The facts in Paragraphs E and E.1.

37. The facts in Paragraphs E and E.5.
38. The facts in Paragraphs E and E.6.
39. The facts in Paragraphs E and E.7.
40. The facts in Paragraphs E and E.8.
41. The facts in Paragraphs E and E.9.
42. The facts in Paragraphs E and E.10.
43. The facts in Paragraphs F and F.2.
44. The facts in Paragraphs F and F.3.
45. The facts in Paragraphs F and F.5.
46. The facts in Paragraphs F and F.6.
47. The facts in Paragraphs F and F.7.
48. The facts in Paragraphs F and F.9.
49. The facts in Paragraphs F and F.11.
50. The facts in Paragraphs F and F.12.
51. The facts in Paragraphs G and G.1.
52. The facts in Paragraphs G and G.2.
53. The facts in Paragraphs G and G.3.
54. The facts in Paragraphs G and G.4.
55. The facts in Paragraphs G and G.5.
56. The facts in Paragraphs G and G.6.
57. The facts in Paragraphs G and G.7.
58. The facts in Paragraphs G and G.8.
59. The facts in Paragraphs G and G.9.
60. The facts in Paragraphs G and G.10.
61. The facts in Paragraphs G and G.11.
67. The facts in Paragraphs H and H.2.
68. The facts in Paragraphs H and H.3.
69. The facts in Paragraphs H and H.4.

70. The facts in Paragraphs H and H.6.
71. The facts in Paragraphs H and H.7.
72. The facts in Paragraphs H and H.8.
73. The facts in Paragraphs H and H.9.
75. The facts in Paragraphs H and H.10.
76. The facts in Paragraphs H and H.11.
77. The facts in Paragraphs H and H.12.
78. The facts in Paragraphs H and H.13.
79. The facts in Paragraphs H and H.14.
80. The facts in Paragraphs H and H.15.
81. The facts in Paragraphs H and H.16.
82. The facts in Paragraphs I and I.2.
83. The facts in Paragraphs I and I.3.
84. The facts in Paragraphs I and I.5.
85. The facts in Paragraphs I and I.6.
86. The facts in Paragraphs I and I.10.
87. The facts in Paragraphs I and I.11.
88. The facts in Paragraphs I and I.12.
89. The facts in Paragraphs I and I.13.

**NINETIETH THROUGH ONE HUNDRED  
FIFTY-EIGHTH SPECIFICATIONS**

**FRAUD**

Respondent is charged with practicing the profession fraudulently in violation of New York Education Law §6530(2)

in that, Petitioner charges:

The allegations of the twenty-first through eighty-ninth specifications are repeated as if fully set forth herein.

ONE HUNDRED FIFTY-NINTH THROUGH TWO HUNDRED  
TWENTY-SEVENTH SPECIFICATIONS

MORAL UNFITNESS

Respondent is charged with conduct in the practice of medicine which evidences moral unfitness to practice medicine in violation of New York Education Law §6530(20) in that, Petitioner charges:

The allegations of the twenty-first through eighty-ninth specifications are repeated as if fully set forth herein.

DATED: \_\_\_\_\_, 1999  
Albany, New York

\_\_\_\_\_  
PETER D. VANBUREN  
Deputy Counsel  
Bureau of Professional  
Medical Conduct