

**These charges are only allegations  
which may be contested by the licensee  
in an administrative hearing.**

Dept. Exhibit 3

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

**IN THE MATTER**  
**OF**  
**ZAHIRUL HOQUE TALUKDER, M.D.**

**STATEMENT**  
**OF**  
**CHARGES**

Zahirul Hoque Talukder, M.D., the Respondent, was authorized to practice medicine in New York State on or about July 21, 2006, by the issuance of license number 241151 by the New York State Education Department.

**FACTUAL ALLEGATIONS**

- A. On or about May 18, 2022, the State of Michigan Department of Licensing and Regulatory Affairs Bureau of Professional Licensing Board of Medicine Disciplinary Subcommittee (hereinafter "the Michigan Board") issued a Consent Order executed by the Michigan Board and Respondent. The Michigan Board imposed a fine of \$3,500. In the Consent Order, Respondent admitted that the facts alleged in an Administrative Complaint, dated on or about May 5, 2021 (hereinafter "the Complaint"), were true and constituted violations of MCL 333.16221(a), (b)(i) and (h).
- B. The Complaint alleged that, in 2015, a minor patient presented to Respondent with reports of pain in her hip and groin area that radiated down her right leg after suffering a fall earlier in the day. Respondent "failed to document an

appropriate physical examination including pertinent portions of the musculoskeletal system and failed to diagnose and treat the patient's right femoral neck fracture."

1. The conduct resulting in the Michigan Order would constitute misconduct under the laws of New York State, pursuant to the following section of New York State Law:

a. N.Y. Education Law § 6530 (32) (Failing to maintain a record for each patient which accurately reflects the evaluation and treatment of the patient), as alleged in the facts of:

i. Paragraphs A and B.

**SPECIFICATION OF CHARGES**

**HAVING A DISCIPLINARY ACTION TAKEN**

Respondent is charged with committing professional misconduct as defined in N.Y. Educ. Law § 6530(9)(d) by having his or her license to practice medicine revoked, suspended or having other disciplinary action taken, or having his or her application for a license refused, revoked or suspended or having voluntarily or otherwise surrendered his or her license after a disciplinary action was instituted by a duly authorized professional disciplinary agency of another state, where the conduct resulting in the revocation, suspension or other disciplinary action involving the license or refusal, revocation or suspension of an application for a license or the surrender of the license would, if committed in New York state, constitute professional misconduct under the laws of New York state, namely N.Y. Educ. Law § (32) as alleged in the facts of the following:

1. The facts in Paragraph A and B.

DATE: September 1 2023  
New York, New York



Henry Weintraub  
Chief Counsel  
Bureau of Professional Medical Conduct