



*Board for Professional Medical Conduct*

Corning Tower • Empire State Plaza • Albany, NY 12237 • (518) 474-8357

Mark R. Chassin, M.D., M.P.P., M.P.H.  
Commissioner

C. Maynard Guest, M.D.  
Executive Secretary

November 26, 1993

**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

Meguerdich Kouyoumdjian, M.D.  
221 Proctor Avenue  
Ogdensburg, New York 13669

RE: License No. 093975

Dear Dr. Kouyoumdjian:

Enclosed please find Order #BPMC 93-194 of the New York State Board for Professional Medical Conduct. This Order and any penalty provided therein goes into effect upon receipt of this letter or seven (7) days after the date of this letter, whichever is earlier.

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  
Empire State Plaza  
Tower Building-Room 438  
Albany, New York 12237-0756

Sincerely,

C. Maynard Guest, M.D.  
Executive Secretary  
Board for Professional Medical Conduct

Enclosure

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

-----X

IN THE MATTER :  
OF : ORDER  
MEGUERDICH KOUYOUMDJIAN, M.D. : BPMC #93-194

-----X


Upon the application of MEGUERDICH KOUYOUMDJIAN, M.D.  
(Respondent) for Consent Order, which application is made a part  
hereof, it is

ORDERED, that the application and the provisions thereof  
are hereby adopted and so ORDERED, and 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 by certified mail, whichever is  
earliest.

SO ORDERED,

DATED: 22 November 1993



Charles J. Vacanti, M.D.  
Chairperson  
State Board for Professional  
Medical Conduct



I hereby agree to the following penalty:

1. My license to practice medicine will be limited as follows:

- a. employment in a hospital setting under the supervision of an obstetrician gynecologist (ob/gyn) board certified by the American Board of Obstetricians and Gynecologists;
- b. employment as a locum tenens ob/gyn at hospitals after obtaining the specific prior approval of the Office of Professional Medical Conduct for each such hospital, such approval being based on the availability and credentials of ob/gyn backup;
- c. requirement of a prior second opinion by a board certified ob/gyn for all gynecologic surgery other than tubal ligations.

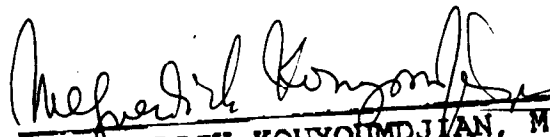
2. A one year suspension of my license to practice medicine, such suspension to be stayed, conditioned on my full compliance with the Terms of Probation attached hereto as Exhibit "B", for a probationary period of one year.

I hereby make this Application to the State Board for Professional Medical Conduct (the Board) and request that it be granted.

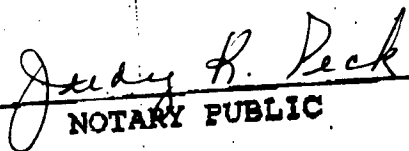
I understand that, in the event that this Application is not granted by the Board, nothing contained herein shall be binding upon me or construed to be an admission of any act of misconduct alleged or charged against me, such Application shall not be used against me in any way and shall be kept in strict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

I agree that, in the event the Board grants my Application, as set forth herein, an order of the Chairperson of the Board shall be issued in accordance with same.

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

  
MEGUERDICH KOUYOUMDJIAN, M.D.  
RESPONDENT

Sworn to before me this  
12<sup>th</sup> day of November 1993.

  
NOTARY PUBLIC

JUDY R. PECK  
NOTARY PUBLIC, STATE OF NEW YORK  
QUALIFIED IN JEFFERSON COUNTY  
304 7500  
MY COMMISSION EXPIRES 9/30/95

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

-----X  
: APPLICATION  
IN THE MATTER :  
: FOR  
OF :  
: CONSENT  
MEGUERDICH KOUYOUMDJIAN, M.D. :  
: ORDER  
-----X

The undersigned agree to the attached application of the Respondent and to the proposed penalty based on the terms and conditions thereof.

Date: 11/12/93

Meguerdich Kouyoumdjian  
MEGUERDICH KOUYOUMDJIAN, M.D.  
RESPONDENT

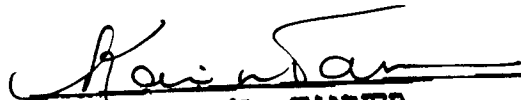
Date: 11/15/93

Amy T. Kulb  
AMY T. KULB, ESQ.  
ATTORNEY FOR RESPONDENT

Date: 11/16/93

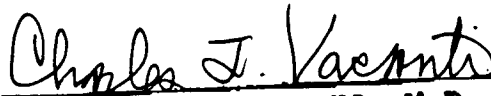
Kevin P. Donovan  
KEVIN P. DONOVAN  
ASSISTANT COUNSEL  
BUREAU OF PROFESSIONAL  
MEDICAL CONDUCT

Date: NOV. 24, 1993



KATHLEEN M. TANNER  
DIRECTOR  
OFFICE OF PROFESSIONAL  
MEDICAL CONDUCT

Date: 22 November 1993



CHARLES J. VACANTI, M.D.  
CHAIRPERSON  
STATE BOARD FOR  
PROFESSIONAL MEDICAL CONDUCT

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

-----X  
IN THE MATTER : STATEMENT  
OF : OF  
MEGUERDICH KOUYOUMDJIAN, M.D. : CHARGES  
-----X

MEGUERDICH KOUYOUMDJIAN, M.D., the Respondent, was authorized to practice medicine in New York State on March 16, 1965, by the issuance of license number 093975 by the New York State Education Department. The Respondent is currently registered with the New York State Education Department to practice medicine for the period January 1, 1993, through December 31, 1994, with a registered address of 221 Proctor Avenue, Ogdensburg, New York 13669.

FACTUAL ALLEGATIONS

A. The Respondent treated Patient A (patients are identified in Appendix A) at his office at 215 Rensselaer Avenue, Ogdensburg, New York from at least April 27, 1988, through November 3, 1988, when he hospitalized Patient A at E.J. Noble Hospital in Gouverneur, New York.

1. Respondent failed to appropriately treat Patient A for her elevated blood pressure at the office visit of October 17, 1988.



2. The Respondent failed to appropriately treat Patient A's hypertension and proteinuria on October 31, 1988.

B. The Respondent treated Patient B from approximately 1978 through at least June 1984.

1. The Respondent hospitalized Patient B from June 9, 1980, to June 12, 1980, at the A. Barton Hepburn Hospital in Ogdensburg, New York (hereinafter "Hepburn Hospital") and performed a cerclage operation for an incompetent cervix.
  - a. The medical records for Patient B do not support a diagnosis of incompetent cervix.
  - b. The cerclage procedure was performed on Patient B without adequate medical indication.
  - c. Respondent inaccurately noted in the hospital record a history of previous fetal losses for Patient B.
  - d. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.
2. The Respondent hospitalized Patient B at the Hepburn Hospital from March 31, 1983, to April 2, 1983, and performed a cerclage operation for an incompetent cervix.
  - a. The medical records for Patient B do not support a diagnosis of incompetent cervix.
  - b. The cerclage procedure was performed on Patient B without adequate medical indication.
  - c. Respondent inaccurately noted in the hospital record a history of previous fetal losses for Patient B.
  - d. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.
3. The Respondent hospitalized Patient B at the Hepburn Hospital from May 31, 1984, to June 2, 1984, and performed a cerclage operation for an incompetent cervix.

- a. The medical records for Patient B do not support a diagnosis of incompetent cervix.
- b. The cerclage procedure was performed on Patient B without adequate medical indication.
- c. Respondent inaccurately noted in the hospital record a history of previous fetal losses for Patient B.
- d. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

C. The Respondent treated Patient C at his office from approximately February 1983 through at least October 1986. The Respondent hospitalized Patient C at the Hepburn Hospital from October 26, 1986 to October 28, 1986 and performed a cerclage operation for an incompetent cervix.

1. The medical records for Patient C do not support a diagnosis of incompetent cervix.
2. The cerclage was performed on Patient C without adequate medical indication.
3. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

D. The Respondent treated Patient D at his office from approximately July 1979 through at least October 1986. The Respondent hospitalized Patient D at the Hepburn Hospital from October 10, 1986, to October 11, 1986, and performed a cerclage operation for an incompetent cervix.

1. The medical records for Patient D do not support a diagnosis of incompetent cervix.
2. The cerclage was performed on Patient D without adequate medical indication.

3. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

E. The Respondent treated Patient E at his office from approximately January, 1982, through at least August 1986. The Respondent hospitalized Patient E at the Hepburn Hospital from August 27, 1986, to August 29, 1986, and performed a cerclage operation for an incompetent cervix.

1. The medical records for Patient E do not support a diagnosis of incompetent cervix.
2. The cerclage was performed on Patient E without adequate medical indication.
3. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

F. The Respondent treated Patient F at his office from approximately May 1980 through at least April 1985.

1. The Respondent hospitalized Patient F in August 1980 at the Hepburn Hospital and performed a cerclage operation for a incompetent cervix.
  - a. The medical records for Patient F do not support a diagnosis of incompetent cervix.
  - b. The cerclage was performed on Patient F without adequate medical indication.
  - c. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.
2. The Respondent hospitalized Patient F at the Hepburn Hospital from March 28, 1985 to April 3, 1985 and performed a cerclage operation for an incompetent cervix.
  - a. The medical records for Patient F do not support a diagnosis of incompetent cervix.
  - b. The cerclage was performed on Patient F without adequate medical indication.

- c. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

G. The Respondent treated Patient G at his office from approximately October 1985 through at least January 1988. The Respondent hospitalized Patient G at the Hepburn Hospital from October 20, 1985 to October 22, 1985, and performed a cerclage operation for an incompetent cervix.

1. The medical records for Patient G do not support a diagnosis of incompetent cervix.
2. The cerclage was performed on Patient G without adequate medical indication.
3. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

H. The Respondent treated Patient H at his office from approximately July 1984 through at least October 1986. The Respondent hospitalized Patient H at the Hepburn Hospital from November 12, 1985, to November 14, 1985, and performed a cerclage operation for an incompetent cervix.

1. The medical records for Patient H do not support a diagnosis of incompetent cervix.
2. The cerclage was performed on Patient H without adequate medical indication.
3. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

I. The Respondent treated Patient I at his office from approximately December, 1978, through at least October 1987. The Respondent hospitalized Patient I at the Hepburn Hospital

from April 2, 1985, to April 4, 1985, and performed a cerclage operation for an incompetent cervix.

1. The medical records for Patient I do not support a diagnosis of incompetent cervix.
2. The cerclage was performed on Patient I without adequate medical indication.
3. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

J. The Respondent treated Patient J at his office from approximately July 1985 through at least February 1986. The Respondent hospitalized Patient J at the Hepburn Hospital from August 15, 1985, to August 17, 1985, and performed a cerclage operation for an incompetent cervix.

1. The medical records for Patient J do not support a diagnosis of incompetent cervix.
2. The cerclage was performed on Patient J without adequate medical indication.
3. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

K. The Respondent treated Patient K at his office from approximately April 1978 through at least October 1986.

1. The Respondent hospitalized Patient K at the Hepburn Hospital from May 11, 1978, to May 13, 1978, for a cerclage operation for an incompetent cervix.
  - a. The medical records for Patient K do not support a diagnosis of incompetent cervix.
  - b. The cerclage was performed on Patient K without adequate medical indication.

- c. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.
2. The Respondent hospitalized Patient K at the Hepburn Hospital from June 17, 1980, to June 20, 1980, for a cerclage operation for an incompetent cervix.
  - a. The medical records for Patient K do not support a diagnosis of incompetent cervix.
  - b. The cerclage was performed on Patient K without adequate medical indication.
  - c. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.
3. The Respondent hospitalized Patient K at the Hepburn Hospital from January 17, 1985, to January 19, 1985, for a cerclage operation for an incompetent cervix.
  - a. The medical records of Patient K do not support a diagnosis of incompetent cervix.
  - b. The cerclage was performed on Patient K without adequate medical indication.
  - c. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.
4. Respondent failed to appropriately evaluate the cervix of Patient K between pregnancies.

L. The Respondent treated Patient L at his office from approximately August 1981 through at least July 1985. The Respondent hospitalized Patient L at the Hepburn Hospital from December 26, 1984, to December 27, 1984, and performed a cerclage operation for an incompetent cervix.

1. The medical records for Patient L do not support a diagnosis of incompetent cervix.
2. The cerclage was performed on Patient L without adequate medical indication and/or after the patient was known to have uterine or vaginal bleeding.

3. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

M. The Respondent treated Patient M at his office from approximately January 1983 through at least October 1987. The Respondent hospitalized Patient M at the Hepburn Hospital from June 14, 1984, to June 16, 1984, and performed a cerclage operation for an incompetent cervix.

1. Respondent failed to appropriately evaluate the cervix of Patient M after the pregnancy which ended January 28, 1983.
2. The medical records for Patient M do not support a diagnosis of incompetent cervix.
3. The cerclage performed on Patient M was performed without adequate medical indication.
4. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

N. The Respondent treated Patient N at his office from approximately July 1977 through at least June 1986.

1. The Respondent hospitalized Patient N at the Hepburn Hospital from January 20, 1983, to January 22, 1983, and performed a cerclage operation for an incompetent cervix.
  - a. The medical records for Patient N do not support a diagnosis of incompetent cervix.
  - b. The cerclage was performed on Patient N without adequate medical indication.
  - c. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.
2. The Respondent hospitalized Patient N at the Hepburn Hospital from December 14, 1984, to December 15, 1984,

and performed a cerclage operation for an incompetent cervix.

- a. The medical records for Patient N do not support a diagnosis of incompetent cervix.
- b. The cerclage was performed on Patient N without adequate medical indication.
- c. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

O. The Respondent treated Patient O at his office from approximately February 1980 through at least June 1986. The Respondent hospitalized Patient O at the Hepburn Hospital from October 9, 1985, to October 11, 1985, and performed a cerclage operation for an incompetent cervix.

1. The medical records for Patient O do not support a diagnosis of incompetent cervix.
2. The cerclage was performed on Patient O without adequate medical indication.
3. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

P. The Respondent treated Patient P at his office from approximately June 1977 through at least March 1987.

1. The Respondent hospitalized Patient P at the Hepburn Hospital from January 25, 1981, to January 28, 1981, and performed a cerclage operation for an incompetent cervix.
  - a. The medical records for Patient P do not support a diagnosis of incompetent cervix.
  - b. The cerclage was performed on Patient P without adequate medical indication.



- c. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.
2. The Respondent hospitalized Patient P at the Hepburn Hospital from September 14, 1982, to September 17, 1982, for a cerclage operation for an incompetent cervix.
  - a. The medical records for Patient P do not support a diagnosis of incompetent cervix.
  - b. The cerclage was performed on Patient P without adequate medical indication.
  - c. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.
3. The Respondent hospitalized Patient P at the Hepburn Hospital from April 19, 1985, to April 20, 1985, for a cerclage operation for an incompetent cervix.
  - a. The medical records for Patient P do not support a diagnosis of incompetent cervix.
  - b. The cerclage was performed on Patient P without adequate medical indication.
  - c. Respondent performed the cerclage knowing that there was no adequate medical indication for the procedure.

Q. The New York State Commissioner of Education issued Order number 8814 on August 9, 1988, imposing certain terms of probation upon the Respondent. The Respondent has failed to comply with the following probationary term:

That Respondent shall, within the first twelve (12) months of the probationary period, at respondent's expense, submit and complete a plan of continuing medical education, to update the knowledge and skills of respondent in the field of obstetrics and

gynecology, said plan to have the prior written approval of the State Board of Medicine.

SPECIFICATION OF CHARGES

FIRST SPECIFICATION

PRACTICING WITH NEGLIGENCE  
ON MORE THAN ONE OCCASION

The Respondent is charged with practicing the profession of medicine with negligence on more than one occasion within the meaning of N.Y. Educ. Law §6530(3) (McKinney Supp. 1993) [formerly N.Y. Educ. Law §6509(2)] in that Petitioner charges that the Respondent committed two or more of the following:

1. The facts of paragraphs A and A.1, A and A.2, B and B.1 and B.1b, B and B.1 and B.1c, B and B.2 and B.2b, B and B.2 and B.2c, B and B.3 and B.3b, B and B.3 and B.3c, C and C.2, D and D.2, E and E.2, F and F.1 and F.1.b, F and F.2 and F.2b, G and G.2, H and H.2, I and I.2, J and J.2, K and K.1 and K.1b, K and K.2 and K.2b, K and K.3 and K.3b, K and K.4, L and L.2, M and M.1, M and M.3, N and N.1 and N.1b, N and N.2 and N.2b, O and O.2, P and P.1 and P.1b, P and P.2 and P.2b and/or P and P.3 and P.3b.

SECOND SPECIFICATION

PRACTICING WITH INCOMPETENCE  
ON MORE THAN ONE OCCASION

The Respondent is charged with practicing the profession of medicine with negligence on more than one occasion within the meaning of N.Y. Educ. Law §6530(5) (McKinney Supp. 1993) [formerly N.Y. Educ. Law §6509(2)] in that the Petitioner charges that the Respondent committed two or more of the following:

2. The facts of paragraphs A and A.1, A and A.2, B and B.1 and B.1b, B and B.1 and B.1c, B and B.2 and B.2b, B and B.2 and B.2c, B and B.3 and B.3b, B and B.3 and B.3c, C and C.2, D and D.2, E and E.2, F and F.1 and F.1.b, F and F2 and F2b, G and G.2, H and H.2, I and I.2, J and J.2, K and K.1 and K.1b, K and K.2 and K.2b, K and K.3 and and K.3b, K and K.4. L and L.2, M and M.1, M and M.3, N and N.1 and N.1b, N and N.2 and N.2b, O and O.2, P and P.1 and P.1b, P and P.2 and P.2b and/or P and P.3 and P.3b.

THIRD SPECIFICATION

PRACTICING WITH  
GROSS NEGLIGENCE

The Respondent is charged with practicing the profession of medicine with gross negligence within the meaning of N.Y. Educ. Law § 6530(4) (McKinney Supp. 1993) [formerly N.Y. Educ. Law §6509(2)] in that the Petitioner charges:

3. The facts of paragraphs A and A.1 and/or A and A.2.

FOURTH SPECIFICATION

PRACTICING WITH  
GROSS INCOMPETENCE

The Respondent is charged with practicing the profession of medicine with gross incompetence within the meaning of N.Y. Educ. Law §6530(4) (McKinney Supp. 1993) (McKinney Supp. 1993) [formerly N.Y. Educ. Law §6509(2)] in that the Petitioner charges:

4. The facts of paragraphs A and A.1 and/or A and A.2.

FIFTH THROUGH NINETEENTH SPECIFICATIONS

FRAUDULENT PRACTICE

The Respondent is charged with practicing the profession of medicine fraudulently within the meaning of N.Y. Educ. Law §6530(2) [formerly (McKinney Supp. 1993) N.Y. Educ. Law §6509(2)] in that the Petitioner charges:

5. The facts of paragraphs B and B.1 and B.1c, B and B.1 and B.1d, B and B.2 and B.2c, B and B.2 and B.2d, B and B.3 and B.3c., and/or B and B.3 and B.3d.
6. The facts of paragraphs C and C.3.
7. The facts of paragraphs D and D.3.
8. The facts of paragraphs E and E.3.
9. The facts of paragraphs F and F.1 and F.1c and/or F and F.2 and F.2c.
10. The facts of paragraphs G and G.3.
11. The facts of paragraphs H and H.3.
12. The facts of paragraphs I and I.3

13. The facts of paragraphs J and J.3.
14. The facts of paragraphs K and K.1 and K.1c, K and K.2 and K.2c, and/or K and K.3 and K.3c.
15. The facts of paragraphs L and L.3.
16. The facts of paragraphs M and M.4.
17. The facts of paragraphs N and N.1 and N.1c and/or N and N.2 and N.2c.
18. The facts of paragraphs O and O.3.
19. The facts of paragraphs P and P.1 and P.1c, P and P.2 and P.2c, and/or P and P3 and P3c.

TWENTIETH THROUGH THIRTY-FOURTH  
SPECIFICATIONS

FAILURE TO MAINTAIN ACCURATE RECORDS

The Respondent is charged with failing to maintain a record for each patient which accurately reflects the evaluation and treatment of the patient within the meaning of N.Y. Educ. Law §6530(32) (McKinney Supp. 1993) [formerly N.Y. Educ. Law §6509(9) and 8 NYCRR § 29.2(a)(3)] in that the Petitioner charges:

20. The facts of paragraphs B and B.1 and B.1a, B and B.1 and B.1c, B and B.2 and B.2a, B and B.2 and B.2c, B and B.3 and B.3a, and/or B and B.3 and B.3c.
21. The facts of paragraphs C and C.1.
22. The facts of paragraphs D and D.1.
23. The facts of paragraphs E and E.1.
24. The facts of paragraphs F and F.1 and F.1.a, and/or F and F.2 and F.2.a.
25. The facts of paragraphs G and G.1.
26. The facts of paragraphs H and H.1.

27. The facts of paragraphs I and I.1.
28. The facts of paragraphs J and J.1.
29. The facts of paragraphs K and K.1 and K.1a, K and K.2 and K.2a, and/or K and K.3 and K.3a.
30. The facts of paragraphs L and L.1
31. The facts of paragraphs M and M.2.
32. The facts of paragraphs N and N.1 and N.1a, and/or N and N.2 and N.2a.
33. The facts of paragraphs O and O.1.
34. The facts of paragraphs P and P.1 and P.1a, P and P.2 and P.2a, and/or P and P.3 and P.3a.

THIRTY-FIFTH THROUGH FORTY-NINTH  
SPECIFICATIONS

EXCESSIVE TREATMENT

The Respondent is charged with committing professional conduct by ordering excessive treatment not warranted by the condition of a patient within the meaning of N.Y. Educ. Law §6530(35) (McKinney Supp. 1993) [formerly N.Y. Educ. Law §6509(9) and 8 NYCRR §29.2(a)(7)] in that the Petitioner charges:

35. The facts of paragraphs B and B.1 and B.1b, B and B.2 and B.2b, B and B.3 and B.3b and/or B and B.3 and B.3c.
36. The facts of paragraphs C and C.2.
37. The facts of paragraphs D and D.2.
38. The facts of paragraphs E and E.2.
39. The facts of paragraphs F and F.1 and F.1b, and/or F and F.2 and F.2.b.
40. The facts of paragraphs G and G.2.
41. The facts of paragraphs H and H.2.

42. The facts of paragraphs I and I.2.
43. The facts of paragraphs J and J.2.
44. The facts of paragraphs K and K.1 and K.1b., K and K.2 and K.2b, and/or K and K.3 and K.3b.
45. The facts of paragraphs L and L.2.
46. The facts of paragraphs M and M.3.
47. The facts of paragraphs N and N.1 and N.1b, and/or N and N.2 and N.2b.
48. The facts of paragraphs O and O.2.
49. The facts of paragraphs P and P.1 and P.1b., P and P.2 and P.2b, and/or P and P.3 and P.3b.

FIFTIETH SPECIFICATION

VIOLATION OF PROBATION

The Respondent is charged with committing professional misconduct by violating the terms of probation imposed by the Board of Regents, within the meaning of N.Y. Educ. Law §6530(29) (McKinney Supp. 1993) [formerly N.Y. Educ. Law §6509(9) and NYCRR §29.1(b)(14)] in that the Petitioner charges:

50. The facts of paragraph Q.

DATED: <sup>New York,</sup>  
~~Albany,~~ New York

July 20, 1993


  
CHRIS STERN HYMAN  
Chief Counsel  
Bureau of Professional Medical  
Conduct

EXHIBIT "B"

TERMS OF PROBATION

1. MEGUERDICH KOUYOUMDJIAN, M.D., during the period of probation, shall conduct himself in all ways in a manner befitting his professional status, and shall conform fully to the moral and professional standards of conduct imposed by law and by his profession;
2. Respondent shall perform 50 hours of continuing medical evaluation, in seminar format, including courses within 100 miles of his residence that are specified by the Office of Professional Medical Conduct (OPMC);
3. Respondent shall make available records of any of his patients at the request of OPMC;
4. Respondent shall submit written notification to the New York State Department of Health (NYSDOH), addressed to the Director, Office of Professional Medical Conduct, New York State Health Department, Corning Tower Building, 4th Floor, Empire State Plaza Albany, New York 12237 of any employment and practice, of Respondent's residence and telephone number, of any change in Respondent's employment, practice, residence, or telephone number within or without the State of New York;
5. Respondent shall submit written proof to the NYSDOH, addressed to the Director, Office of Professional Medical Conduct, as aforesaid, that 1) Respondent is currently registered with the NYSED, unless Respondent submits written proof that Respondent has advised DPLS, NYSED, that Respondent is not engaging in the practice of Respondent's profession in the State of New York and does not desire to register; said proof of the above to be submitted no later than the first two months of the period of probation;
6. Respondent shall comply with all terms, conditions, restrictions, and penalties to which he is subject pursuant to the order of the Board;
7. Respondent shall bear all costs related to compliance with the Terms of Probation.
8. So long as there is full compliance with every term herein set forth, Respondent may continue to practice his profession; provided, however, that upon receipt of evidence of any violation of these terms, the Director of the Office of Professional Medical Conduct and/or the Board may initiate a violation of probation proceeding and/or such other proceeding against Respondent as may be authorized pursuant to the Public Health Law.