

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

IN THE MATTER

OF

JACKIE PUJOL, M.D.

STATEMENT

OF

CHARGES

Jackie Pujol, M.D., the Respondent, was authorized to practice medicine in New York State on or about June 15, 1972, by the issuance of license number 112525 by the New York State Education Department.

FACTUAL ALLEGATIONS

1. On or about April 1, 2015, the Virginia Department of Health Professions (herein after the "VDHP") by Order (herein after the "Virginia Order"), after having opened an inquiry into the conduct and medical practice of Respondent, suspended the Respondent's license to practice medicine and surgery in the Commonwealth of Virginia. The VDHP based its determination on evidence that the State of Maryland Board of Physicians accepted a voluntary surrender letter, in lieu of further disciplinary action of Respondent's license to practice medicine in Maryland. The letter of surrender was predicated on the fact that Respondent acknowledged the fact that there was sufficient evidence to impose discipline on Respondent pursuant to Maryland Medical Practice Act., Health Occ. §14-404(a)(3)(ii) and (27) for the unprofessional conduct in the practice of medicine for the selling, prescribing giving away, or administering drugs for illegal or illegitimate medical purposes.
 - a. The conduct resulting in the Virginia Order would constitute misconduct under the laws of New York State, pursuant to the following section of New York State Law:

- i. New York Education Law Section 6530(2) (Practicing the profession fraudulently or beyond its authorized scope.)
- ii. New York Education Law Section 6530(3) (Practicing the profession with negligence on more than one occasion.)
- iii. New York Education Law Section 6530(20) (Conduct in the practice of medicine which evidences moral unfitness to practice medicine.)
- iv. New York Education Law Section 6530(32) (Failing to maintain a record for each patient which accurately reflects the care and treatment of the patient.)

SPECIFICATION OF CHARGES

HAVING HAD 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 §6530(2),(3),(20), and/or (32) as alleged in the facts of the following:

1. The facts in Paragraph 1 and its subparagraphs.

DATE: *Aug 21*, 2016
New York, New York



Roy Nemerson
Deputy Counsel
Bureau of Professional Medical Conduct