BEFORE THE OHIO VETERINARY MEDICAL LICENSING BOARD

IN THE MATTER OF:

DR. BEA TURK

CASE NO. 13-13-022, 13-13-028 and 13-13-031

CONSENT AGREEMENT

- 1. This agreement is made between Dr. Bea Turk, D.V.M. and the Ohio Veterinary Medical Licensing Board ("Board").
- 2. The above parties hereby stipulate to the jurisdiction of the Board over this matter.
- 3. The Board and Dr. Turk enter into this Agreement in lieu of formal proceedings. Dr. Turk voluntarily enters into this Consent Agreement being fully informed of her rights under Chapter 119, ORC, including the right to representation by legal counsel and the right to a formal adjudicative hearing on the issues considered herein.
- 4. The parties agree that the terms of this agreement are a compromise and that the agreement binds the parties hereto, their assigns and successors in interest.
- 5. This Consent Agreement is entered into on the basis of the following stipulations, admissions and understandings:
 - a. The Board is empowered by Section 4741.22, ORC, to deny, permanently revoke, revoke, suspend, or place a fine on any license issued by the Board.
 - b. Dr. Bea Turk knowingly and voluntarily admits that she violated R.C. 4741.22(A) 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. Turk and the Board hereby agree to the following settlement:

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- a) Dr. Turk agrees to voluntarily surrender her license to practice veterinary medicine in the State of Ohio within thirty (30) days of the execution of this agreement.
- b) Dr. Turk agrees that she will not apply to reactivate her license to practice veterinary medicine at any future date, and if an application for reactivation is received by the Board from Dr. Turk, she understands it will be denied by the Board. Dr. Turk waives her right to an appeal and an opportunity to be heard pursuant to Chapter 119 of the Ohio Revised Code as to the denial of such application.
- c) Dr. Turk agrees that thirty (30) days from the execution of this agreement she will no longer practice veterinary medicine in the State of Ohio, and if the Board determines that Dr. Turk is performing veterinary medicine she will be subject to criminal prosecution pursuant to R. C. 4741.99.
- 7. If the Board determines that Dr. Turk has violated any term(s) in Subsection 6 above, the Board by certified mail will give Dr. Turk notice of the violation of this agreement. If, thirty days from receipt of the certified letter, Dr. Turk does not comply with the term(s) violated, the Board may revoke Dr. Turk's veterinary medical license. Dr. Turk hereby knowingly and voluntarily waives her right to an an appeal and an opportunity to be heard pursuant to Chapter 119 of the Ohio Revised Code as to any revocation invoked by the Board for a violation of the term(s) of which she was notified.

8. The terms, limitations and conditions of this Consent Agreement may be modified or terminated in writing at any time upon the agreement of both Dr. Turk and the Board.

9. Dr. Turk acknowledges that she has had an opportunity to ask questions

concerning the terms of this Consent Agreement and that all questions asked have been answered

in a satisfactory manner.

Dr. Turk waives all of his rights under Chapter 119, ORC, as they relate to 10.

matters that are the subject of this Consent Agreement.

11. Dr. Turk waives any and all claims or causes of action she may have against the

Board, and its members, officers, employees and/or agents arising out of matters that are the

subject of this Consent Agreement.

12. This Consent Agreement shall be considered a public record as that term is used

in Section 149.43, ORC. The information contained herein may be reported to appropriate

organizations, data banks and governmental bodies.

Dr. Turk understands that this Consent Agreement is subject to ratification by the 13.

Board prior to signature by the Board President and shall become effective upon the last date of

signature below.

Gurda Dass, D.V. M.

President

Ohio Veterinary Medical

Licensing Board

Date: $\frac{6/12/13}{}$