IN THE MATTER OF

* BEFORE THE

ACE FOSTER ARMANI I, O.D.

* MARYLAND STATE

Respondent

BOARD OF EXAMINERS

* IN OPTOMETRY

License Number: DA2032

Case Numbers: 2019-001

2019-010

* * * * * * * * * * * *

FINAL ORDER OF REVOCATION OF OPTOMETRY LICENSE

On June 6, 2019, the Maryland State Board of Examiners in Optometry (the "Board") notified ACE FOSTER ARMANI I, O.D. (the "Respondent"), License Number DA2032, of its INTENT TO REVOKE the Respondent's license to practice optometry in the State of Maryland. The Notice informed the Respondent that unless the Respondent requested a hearing in writing within 30 days of the date of mailing of the Notice, the Board intended to sign this Final Order, which was enclosed. More than 30 days have elapsed and the Respondent failed to request a hearing. Therefore, the Board hereby revokes the Respondent's license to practice optometry.

The basis for the Board's action was pursuant to the Maryland Optometry Act (the "Act"), Md. Code Ann., Health Occ. ("Health Occ.") §§ 11-101 et seq. (2014 Repl. Vol. & 2018 Supp.) and Code Md. Regs. ("COMAR") 10.28 et seq.

The pertinent provisions of the Act provide:

Health Occ. § 11-313. Denials, reprimands, probations, suspensions, and revocations – Grounds.

Subject to the hearing provisions of § 11-315 of this subtitle, the Board, on the affirmative vote of a majority of its members then serving, may deny a license to any applicant, reprimand any licensee, place any licensee on probation, or suspend or revoke a license if the applicant or licensee:

- (1) Fraudulently or deceptively obtains or attempts to obtain a license for the applicant or licensee or for another;
- (3) Is convicted of or pleads guilty or nolo contendere to a felony or to a crime involving moral turpitude, whether or not any appeal or other proceeding is pending to have the conviction or plea set aside;
- (7) Willfully makes or files a false report or record in the practice of optometry;
- (17) Behaves immorally in the practice of optometry;
- (18) Is professionally, physically or mentally incompetent;
- (19) Advertises in a false or misleading manner;
- (20) Has had a license to practice optometry denied, suspended or revoked in another state for an act which would be grounds for disciplinary action under this section;
- (21) Has violated any provision of this title;
- (22) Violates any rule or regulation adopted by the Board;
- (23) Commits an act of unprofessional conduct in the practice of optometry; [and]
- (25) Willfully engages in conduct that is likely to deceive, defraud, or harm the public[.]

Health Occ. § 11-501. Practicing without license.

Except as otherwise provided in this title, a person may not practice, attempt to practice, or offer to practice optometry in this State unless licensed by the Board.

Health Occ. § 11-502. Misrepresentation as optometrist.

Unless licensed to practice optometry under this title, a person may not represent to the public by title, by description of services, methods, or procedures, or otherwise, that the person practices optometry.

The pertinent provisions of COMAR provide:

10.28.09.03. Advertising.

- B. An advertisement may not contain statements:
 - (2) Likely to mislead or deceive because in context the statements make only a partial disclosure of relevant facts[.]

10.28.14.03. General Conduct.

- B. In the capacity of or identity as a licensed optometrist, the licensee may not:
 - (1) Participate or condone dishonesty, fraud, deceit, or misrepresentation[.]

This Notice supersedes the Charges Under the Maryland Optometry Act, under Case Number 2019-001, issued by the Board against the Respondent, dated September 28, 2018.

INVESTIGATIVE FINDINGS

The Board has reason to believe that the following facts are true:

I. BACKGROUND/LICENSING INFORMATION

1. At all times relevant hereto, the Respondent was licensed to practice optometry in the State of Maryland. The Respondent was initially licensed to practice optometry in Maryland on October 31, 2006, under License Number DA2032. The Respondent's optometry license is scheduled to expire on June 30, 2020.

- 2. On September 18, 2018, the Board, pursuant to its authority under Md. Code Ann., State Gov't ("State Gov't") § 10-226(c)(2)(2014 Repl. Vol.), issued an order entitled, *Order for Summary Suspension*, in which it summarily suspended the Respondent's Maryland optometry license, concluding that the public health, safety or welfare imperatively required emergency action.
- 3. At all times relevant hereto, the Respondent was licensed to practice optometry in the Commonwealth of Virginia. The Respondent was originally licensed to practice optometry in Virginia under the name Armin Namazizadeh on October 3, 2006, under License Number 0618-001615. On April 11, 2018, the Virginia Board of Optometry (the "Virginia Board") issued an *Order for Summary Suspension* in which it summarily suspended the Respondent's Virginia optometry license. *See* ¶ 14-15, *infra*. The Respondent's Virginia optometry license remains suspended as of the date of this filing.
- 4. At all times relevant hereto, the Respondent was licensed to practice optometry in the State of Oklahoma. The Respondent was originally licensed to practice optometry in Oklahoma under the named Armin Namazizadeh on July 14, 2010, under License Number 2665. On or about January 20, 2012, the Oklahoma State Board of Examiners in Optometry (the "Oklahoma Board") issued a disciplinary order against the Respondent. *See* ¶ 12-13, *infra*. The Respondent's Oklahoma optometry license became inactive on or about October 17, 2013.
- 5. The Respondent was issued a license by the District of Columbia Board of Optometry (the "D.C. Board") on or about January 2, 2013, under License Number

OP1000257. The Respondent's District of Columbia optometry license expired on or about March 31, 2014.

II. DISCIPLINARY HISTORY/INVESTIGATIVE ALLEGATIONS

6. The Board initiated an investigation of the Respondent in 2018 after receiving information that the Virginia Board summarily suspended the Respondent's Virginia optometry license. As a result, the Board summarily suspended the Respondent's Maryland optometry license through an order dated September 18, 2018. See ¶ 2-3, supra. The Board's investigation determined that the Respondent has been convicted of committing a series of crimes in various jurisdictions and has been disciplined by state optometry boards where he was licensed. The Respondent failed to disclose this information when submitting his Maryland optometry license renewal applications. After the Board issued disciplinary charges against the Respondent on September 28, 2018, it received information that the Respondent practiced optometry in Maryland without a license. The Board's investigation determined that the Respondent practiced optometry in Maryland without a valid Maryland optometry license. The Board's investigative findings are set forth infra.

Consent Order, Virginia, August 11, 2010

7. On or about August 11, 2010, the Respondent, then under the name Armin Namazizadeh, O.D., entered into a Consent Order with the Virginia Board in which it found as a matter of law that he violated laws¹ and regulations² governing the practice of

¹ The Virginia Board found that the Respondent violated the following provisions of Virginia Code § 54.1-3215: (1), Fraud or deceit in his practice; (9), Advertising which directly or indirectly deceives,

optometry in Virginia.

- 8. In support of these violations, the Virginia Board found that, among other things, the Respondent: (a) identified himself as a "Medical Director" of his clinic, but was not a medical doctor; (b) identified himself by name only, without adding the professional credential "O.D." or "Doctor of Optometry" following his name; (c) advertised his ability to perform surgery, including Lasik surgery; and (d) had signage on his office entrance that failed to identify him as an optometrist. In addition, the Virginia Board reviewed a random sample of the Respondent's records that showed that he: failed to record visual acuity; failed to record keratometry readings in several cases; failed to record pupil measurements; diagnosed a patient's ocular health as being normal, but also diagnosed the patient with macular degeneration but failed to provide a treatment plan to address the condition; and failed to dilate a patient's eyes despite having the patient's consent to dilation.
- 9. Pursuant to the Consent Order, the Virginia Board reprimanded the Respondent, imposed a monetary penalty of \$1000, and imposed other conditions.
- 10. By letter dated January 4, 2013, the Virginia Board notified the Respondent that he complied with the terms of the Consent Order.

misleads or defrauds the public, claims professional superiority, or offers free optometrical services or examinations; (16), Violating any other standards of conduct as adopted by the Board; and (17), Violating, assisting, inducing or cooperating with others in violating any provisions of law relating to the practice of optometry, including the provisions of this chapter, or of any regulation of the Board. The Virginia Board also found that the Respondent violated Virginia Code § 54.1-3204(6), which states that it is unlawful for any person to publish or cause to be published in any manner an advertisement that is false, deceptive or misleading, contains a claim of professional superiority, or violates regulations of the Board governing advertising by optometrists.

² The Virginia Board found that the Respondent violated 18 VAC 105-20-40(1), (4), (13) and (14); 18 VAC 105-20-45(1)(b), (c); and 18 VAC 105-20-50(B)(1), (2) and (4).

Order, California, March 16, 2011

11. On March 16, 2011, the California State Board of Optometry (the "California Board") issued a Modified Citation Order in which it found that the Respondent violated California laws governing the practice of optometry when he was disciplined by another governmental agency, *i.e.*, the Virginia Board, in violation of Cal. Bus. & Prof. Code § 3110(a) and (h).

Order, Oklahoma, January 20, 2012

- 12. On January 20, 2012, the Oklahoma Board, after conducting a hearing, issued an order entitled, *Findings of Fact, Conclusions of Law and Order* (the "Oklahoma Order"), in which it found as a matter of law that the Respondent violated Oklahoma laws and regulations governing the practice of optometry when he was disciplined by the Virginia Board for an act that would constitute grounds for action in Oklahoma, in violation of 59 O.S. § 585B and OAC 505:10-5-13(b)(29); and for failing to disclose this disciplinary action to the Oklahoma Board, in violation of OAC 505:10-5-13(b)(30).
- 13. Pursuant to the Oklahoma Order, the Oklahoma Board placed the Respondent on probation for one year.

Order for Summary Suspension, Virginia, April 11, 2018

- 14. On April 11, 2018, the Virginia Board summarily suspended the Respondent's Virginia optometry license, finding that he posed "a substantial danger to [the] public health or safety."
 - 15. In documents prepared and issued in support of its action, the Virginia

Board alleged that the Respondent:

- (a) Violated Virginia Code § 54.1-3215(2)³ in that on or about February 23, 2016, he was convicted of petit larceny, a misdemeanor crime of moral turpitude, in the Fairfax County, Virginia, General District Court; and on or about March 24, 2016, was convicted of petit larceny, a misdemeanor crime of moral turpitude, in the Loudoun County, Virginia, General District Court;
- (b) Violated Virginia Code § 54.1-3215(4)⁴ in that he is unable to practice safely as an optometrist due to a mental condition and substance abuse, as evidenced by the following:
 - (i) On or about May 7, 2012, the Respondent was convicted of the misdemeanor crimes of driving under the influence and eluding in the Cherokee County, Oklahoma, District Court;
 - (ii) On or about January 20, 2016, the Respondent was arrested for conduct occurring at a fitness facility on January 5, 2016. On or about March 24, 2016, the Respondent was convicted of disorderly conduct in the Fairfax County, Virginia, General District Court;
 - (iii) On or about January 5, 2016, during a second encounter with law enforcement, the Respondent disclosed to police that he had a mental condition for which he had been hospitalized and was transported to the Woodburn Place, Fairfax Crisis

³ Virginia Code § 54.1.3215(2) states that the Virginia Board may revoke or suspend an optometry license if the licensee is convicted of any felony under the laws of the Commonwealth, another state, the District of Columbia, or any United States possession or territory or of any misdemeanor under such laws involving moral turpitude.

⁴ Virginia Code § 54.1-3215(4) states that the Virginia Board may revoke or suspend an optometry license if the licensee uses alcohol or drugs to the extent such use renders the licensee unsafe to practice optometry or mental or physical illness rendering the licensee unsafe to practice optometry.

Facility, Fairfax, Virginia;

- (iv) On or about January 9, 2016, police officers arrested the Respondent after he became disruptive and allegedly behaved violently toward a neighbor, who reported him to police. On or about March 10, 2016, the Respondent was convicted of misdemeanor disorderly conduct in the Fairfax County, Virginia, General District Court;
- (v) On or about January 9, 2016, while being interviewed by a Fairfax County, Virginia, detective, the Respondent began acting in an irrational manner and disclosed personal health information about his mental health history;
- (vi) On or about January 15, 2016, the Respondent was hospitalized for a mental condition and was discharged with one or more mental health conditions; and
- (vii) On or about April 8, 2016, the Respondent was convicted of possession of marijuana in the Fairfax County, Virginia, General District Court.

Criminal Conviction, Maryland, 2016

16. On or about January 6, 2016, the Respondent, then under the name Armin Namazizadeh, was arrested and charged in Montgomery County, Maryland, with disorderly conduct, two counts of trespass, and resisting arrest. On or about March 29, 2016, the Respondent appeared in the District Court for Montgomery County, Maryland, and pleaded guilty to the charge of misdemeanor disorderly conduct. The other charges were *nolle prossed*. The Respondent was given probation before judgment, was placed on supervised probation for two years, and was assessed court costs.

Criminal Convictions, District of Columbia, 2016-2017

17. On or about June 6, 2017, the Respondent was charged with two counts of misdemeanor sex abuse in the District of Columbia. On or about November 1, 2017, the

Respondent was found guilty of two counts of misdemeanor sex abuse in the Superior Court of the District of Columbia. The Respondent was sentenced to two concurrent 90-day suspended sentences and was placed on probation for 18 months, concurrent with the probation imposed in ¶ 18, *infra*. On March 26, 2019, the Respondent's convictions were affirmed by the District of Columbia Court of Appeals.

18. On or about November 21, 2016, the Respondent was charged with destruction of property, less than \$1000, in the District of Columbia. On or about November 2, 2017, the Respondent was found guilty of destruction of property, less than \$1000, in the Superior Court of the District of Columbia. The Respondent was sentenced to a 30-day suspended sentence and was placed on probation for 18 months. On March 26, 2019, the Respondent's conviction was affirmed by the District of Columbia Court of Appeals.

Criminal Conviction, North Carolina, 2018

19. On or about May 21, 2018, the Respondent pleaded guilty to, and was convicted of, the charge of misdemeanor larceny in the Superior Court of Mecklenburg County, North Carolina. The Respondent was sentenced to incarceration for 45 days, which was suspended in its entirety,⁵ and was placed on unsupervised probation for 18 months, subject to terms and conditions, including counseling and payment of costs.

Failure to Disclose

20. The Board's investigation determined that the Respondent failed to disclose the existence of the above disciplinary actions/criminal convictions/relevant facts in a

⁵The Respondent was given credit for 6 days spent in confinement prior to sentencing.

series of online renewal applications he submitted to the Board. In each application, the Respondent certified that he personally reviewed all his responses and that the information he gave was true and correct to the best of his knowledge.

2011 Renewal Application

- 21. On or about May 3, 2011, the Respondent, then under the name of Armin Namazizadeh, filed an online renewal of licensure application with the Board (the "2011 Renewal Application"). In the application, the Respondent answered "NO" to whether, since his last renewal, any State licensing or disciplinary board had taken action against his license, including reprimand, suspension or revocation.
- 22. The Respondent failed to disclose in his 2011 Renewal Application that the Virginia Board took disciplinary action against him, which resulted in the Consent Order, dated August 10, 2010, in which it reprimanded him, see ¶ 7-10, supra; and the California Board took disciplinary action against him, which resulted in the Modified Consent Order, dated March 16, 2011, see ¶ 11, supra.

2013 Renewal Application

- 23. On or about July 31, 2013, the Respondent filed an online renewal of licensure application with the Board (the "2013 Renewal Application"). In the application, the Respondent answered "NO" to whether, since his last renewal: any State licensing or disciplinary board had taken action against his license, including reprimand, suspension or revocation; and he pled guilty, *nolo contendere*, or had been convicted of, or received probation before judgment for, driving while intoxicated.
 - 24. The Respondent failed to disclose in his 2013 Renewal Application that the

Oklahoma Board took disciplinary action against him, which resulted in its Order, dated January 20, 2012, in which it placed him on probation. *See* ¶ 12-13.

25. The Respondent failed to disclose in his 2013 Renewal Application that he was convicted of driving while under the influence in Cherokee County, Oklahoma, on or about May 7, 2012. See ¶ 15(b)(i), supra.

2014 Renewal Application

- 26. On or about June 25, 2014, the Respondent filed an online renewal of licensure application with the Board (the "2014 Renewal Application"). In the application, the Respondent answered "NO" to whether, since his last renewal, he surrendered or failed to renew his license in any state.
- 27. The Respondent failed to disclose in his 2014 Renewal Application that his license to practice optometry in Oklahoma became inactive in or about October 2013, *see* ¶ 4, *supra*; and that his license to practice optometry in the District of Columbia expired on or about March 31, 2014, see ¶ 5, *supra*.

2016 Renewal Application

- 28. On or about May 9, 2016, the Respondent filed an online renewal of licensure application with the Board (the "2016 Renewal Application"). In the application, the Respondent answered "NO" to whether, since his last renewal: he pled guilty, *nolo contendere*, or was convicted of, or received probation before judgment for, any criminal act; and he pled guilty, *nolo contendere*, or was convicted of, or received probation before judgment for, a controlled dangerous substance offense.
 - 29. The Respondent failed to disclose in his 2016 Renewal Application that he

was convicted of: petit larceny in Fairfax County, Virginia, on or about February 23, 2016, see ¶ 15(a), supra; petit larceny in Loudoun County, Virginia, on or about March 24, 2016, see ¶ 15(a), supra; disorderly conduct in Fairfax County, Virginia, on or about March 24, 2016, see ¶ 15(b)(ii), supra; disorderly conduct in Fairfax County, Virginia, on or about March 10, 2016, see ¶ 15(b)(iv), supra; possession of marijuana in Fairfax County, Virginia, on or about April 8, 2016, see ¶ 15(b)(vii), supra; and disorderly conduct in Montgomery County, Maryland, on or about March 29, 2016, see ¶ 16, supra.

2018 Renewal Application

- 30. On or about June 29, 2018, the Respondent filed an online renewal of licensure application with the Board (the "2018 Renewal Application"). In the application, the Respondent answered "NO" to whether, since his last renewal: any State licensing or disciplinary board had taken action against his license, including reprimand, suspension or revocation; there are any outstanding complaints, investigations or charges pending against him in any State by any licensing or disciplinary board; pled guilty, *nolo contendere*, or was convicted of, or received probation before judgment for any criminal act (excluding traffic violations); and he had a physical or mental illness that currently impaired his ability to practice his profession.
- 31. The Respondent failed to disclose in his 2018 Renewal Application that: the Virginia Board summarily suspended his optometry license, effective April 11, 2018, see ¶ 14-15; he was subject to an ongoing investigation by the Virginia Board, which involved, inter alia, his mental condition, see ¶ 14-15, supra; he was convicted of two counts of misdemeanor sex abuse in the District of Columbia, on or about November 1,

2017, see ¶ 17, supra; he was convicted of destruction of property, less than \$1000 in the District of Columbia, on or about November 2, 2017, see ¶ 18, supra; and he was convicted of misdemeanor larceny in Mecklenburg County, North Carolina, on or about May 21, 2018, see ¶ 19, supra.

Practicing Without a License

- 32. In a complaint to the Board, dated March 18, 2019, an adult female patient (the "Complainant")⁶ reported that the Respondent, whose Maryland optometry license was suspended, performed an eye examination on her.
- 233. The Complainant reported that on March 18, 2019, she presented for an eye examination and renewal of her contact lens prescription at an optometry practice (the "Practice") in Bethesda, Maryland. The Complainant stated that she had been referred to the Practice by her insurance company. The Complainant stated that upon entering the Practice, she was directed to the Respondent, who performed an eye examination of her using instruments including an autorefractor, tonometer and phoropter. The Complainant stated that the examination the Respondent provided was "extremely rushed and was not thorough at all." The Respondent then gave the Complainant a new prescription for contact lenses and informed her that she would have better vision with this prescription. The Respondent then provided a pair of trial contact lenses for her to wear. The Complainant inserted the contact lenses, after which her visit with the Respondent ended. The Complainant stated that the Respondent saw an elderly patient before her

⁶ To maintain confidentiality, the names of all witnesses, facilities, employees, and patients will not be used in this document but will be provided to the Respondent on request.

appointment and that another elderly patient was waiting to see him when she concluded her appointment with him.

- 34. The Complainant reported that about one hour after inserting the contact lenses, she began to experience dizziness and nausea, such that she was forced to remove the lenses, after which the symptoms stopped immediately. The Complainant stated that due to concerns about the Respondent's treatment of her and his examination, she did an internet search and found that the Respondent's optometry license was suspended. The Complainant then contacted the Practice, the Board and other law enforcement entities.
- 35. After receiving this complaint, the Board initiated a new investigation of the Respondent. A Board investigator contacted the optometrist (the "Optometrist") who provides examinations at the Practice. The Optometrist stated that from time to time, she used the Respondent on a "fill-in" basis to perform eye examinations at the Practice and that he provided optometry services at the Practice from March 15-19, 2019, during which time he saw approximately 30 patients. The Optometrist stated that she did not check whether the Respondent had a current Maryland license during this time.
- 36. The Board's investigation determined that in or around March 2019, the Respondent practiced optometry in Maryland without a current Maryland license, in violation of Health Occ. § 11-501; and/or represented to the public, by title, by description of services, methods, or procedures, or otherwise, that he practiced optometry, without a valid Board licensure, in violation of Health Occ. § 11-502.

Pending Criminal Charges, Maryland, 2019

37. On or about April 17, 2019, the Respondent was charged in the District

Court for Montgomery County, Maryland, with seven counts of practicing optometry without a license. The Respondent's trial date on those charges is scheduled for July 11, 2019.

III. GROUNDS FOR DISCIPLINE

- 38. The Respondent's actions, as described above, constitute, in whole or in part, a violation of the following provisions of the Act under Health Occ. § 11-313: (1) Fraudulently or deceptively obtains or attempts to obtain a license for the applicant or licensee or for another; (3) Is convicted of or pleads guilty or nolo contendere to a felony or to a crime involving moral turpitude, whether or not any appeal or other proceeding is pending to have the conviction or plea set aside; (7) Willfully makes or files a false report or record in the practice of optometry; (17) Behaves immorally in the practice of optometry; (18) Is professionally, physically or mentally incompetent; (19) Advertises in a false or misleading manner; (20) Has had a license to practice optometry denied, suspended or revoked in another state for an act which would be grounds for disciplinary action under this section; (21) Has violated any provision of this title; (22) Violates any rule or regulation adopted by the Board; (23) Commits an act of unprofessional conduct in the practice of optometry; and (25) Willfully engages in conduct that is likely to deceive, defraud, or harm the public.
- 39. The Respondent's actions, as described above, constitute, in whole or in part, a violation of the following COMAR provisions: 10.28.09.03B(2) (an advertisement may not contain statements likely to mislead or deceive because in context the statements make only a partial disclosure of relevant facts); and 10.28.14.03B(1) (in

the capacity of or identity as a licensed optometrist, the licensee may not participate or condone dishonesty, fraud, deceit, or misrepresentation).

- 40. The Respondent's actions, as described above, constitute, in whole or in part, practicing optometry without a license, in violation of Health Occ. § 11-501.
- 41. The Respondent's actions, as described above, constitute, in whole or in part, representing to the public by title, by description of services, methods or procedures, or otherwise, that he was licensed to practice optometry in Maryland, when he was in fact not licensed, in violation of Health Occ. § 11-502.

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact, the Board concludes as a matter of law that the Respondent violated: Health Occ. §§ 11-313(1), (3), (7), (17), (18), (19), (20), (21), (22), (23), and (25); Health Occ. §§ 11-501 and 11-502; and COMAR 10.28.09B(2) and 10.28.14.03B(1).

<u>ORDER</u>

It is, on the affirmative vote of a majority of the quorum of the Board, hereby:

ORDERED that the license of ACE FOSTER ARMANI, I, O.D, is REVOKED; and it is further

ORDERED that this is a PUBLIC DOCUMENT pursuant to Md. Code Ann.,

Gen. Prov. §§ 4-101 et seq. (2014 & 2018 Supp.).

Patricia G. Bennett, Executive Director

Maryland State Board of Examiners in Optometry

NOTICE OF RIGHT TO PETITION FOR JUDICIAL REVIEW

Pursuant to Health Occ. § 11-318, the Respondent has the right to seek judicial

review of this Final Decision and Order. Any petition for judicial review shall be filed

within thirty (30) days from the date of mailing of this Final Decision and Order. The

cover letter accompanying this final decision and order indicates the date the decision is

mailed. Any petition for judicial review shall be made as provided for in the

Administrative Procedure Act, Md. Code Ann., State Gov't § 10-222 and Title 7, Chapter

200 of the Maryland Rules of Procedure.

If the Respondent files a petition for judicial review, the Board is a party and

should be served with the court's process at the following address:

Patricia G. Bennett

Executive Director

Maryland State Board of Examiners in Optometry

4201 Patterson Avenue

Baltimore, Maryland 21215

Phone: (410) 764-5994

Fax: (410) 358-2906

Notice of any petition should also be sent to the Board's counsel at the following address:

Deborah Donohue, Assistant Attorney General

Maryland Office of the Attorney General

Maryland Department of Health

300 West Preston Street, Suite 302

Baltimore, Maryland 21201

Phone: (410) 767-4308

Fax: (410) 333-7894

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