



5. The allegations in paragraph 5 concern the Board of Medical Practice's investigation and Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore, such allegations are denied.

6. To the extent the allegations in paragraph 6 concern the Board of Medical Practice's investigation, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore, such allegations are denied. To the extent the allegations in paragraph 6 concern a letter written to Respondent from the pharmacist referred to in paragraph 6, that letter speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with such a letter, such allegations are specifically denied.

7. The allegations in paragraph 7 concern the Board of Medical Practice's investigation and Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore, such allegations are denied.

8. Admitted that Respondent spoke to a Medical Board investigator in 2000. To the extent the allegations in paragraph 8 concern a letter Respondent wrote to the investigator, that letter speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with that letter, such allegations are specifically denied. To the extent the remaining allegations in paragraph 8 concern the Board of Medical Practice's investigation, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore, such allegations are denied.

9. Admitted that the Board of Medical Practice subsequently subpoenaed on multiple occasions medical records for patients who had received narcotic prescriptions from Respondent. To the extent the remaining allegations in paragraph 9 concern the Board of Medical Practice's

investigation, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore, such allegations are denied.

10. Admitted that on June 18, 2001, Respondent met with members of the Board's Central Investigative Committee to discuss his prescribing of narcotics for particular patients. To the extent the remaining allegations in paragraph 10 concern the Board of Medical Practice's investigation or monitoring, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore, such allegations are denied.

11. Admitted that by letter dated January 6, 2004, Assistant Attorney General James Arisman wrote to Respondent's attorney. This letter speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with this letter, such allegations are specifically denied.

12. Admitted.

13. Admitted that on April 26, 2004, Respondent signed a letter to David W. Clauss, M.D., as the Chair of the Board's Central Investigative Committee. The April 26, 2004 letter speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with the April 26, 2004 letter, such allegations are specifically denied. Any remaining allegations are denied.

14. The April 26, 2004 letter speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with the April 26, 2004 letter, such allegations are specifically denied.

15. The April 26, 2004 letter speaks for itself. To the extent the allegations contained in this paragraph, including subsections a-r of paragraph 15, are inconsistent with the April 26,

2004 letter, such allegations are specifically denied. Footnote 2 to paragraph 15 is admitted. Footnote 3 states a conclusion of law as to which no answer is required.

16. To the extent the allegations in paragraph 16 concern the Board of Medical Practice's investigation and/or monitoring, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore, such allegations are denied. To the extent the allegations in paragraph 16 concern the April 26, 2004 letter, that letter speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with that letter, such allegations are specifically denied. Respondent denies that he acted in "bad faith" and denies as stated, that he had "failed to comply with the promises and standards he set forth" in the April 26, 2004 letter. Respondent further denies that he made false or misleading statements to the Medical Board investigator, improperly altered patient records or acted to conceal the true frequency and quantity of his prescribing of narcotics as alleged in this paragraph. Admitted that Respondent did provide medical care for the ten patients specifically identified in the Charges in a manner consistent with accepted and proper medical practice, including prescribing medications, including narcotics, and for the specific time periods as set out in their respective medical records. Any remaining allegations are denied.

17. The allegations in this paragraph specific to claimed actions or failures by Respondent are denied as stated. To the extent the allegations in paragraph 17 concern the April 26, 2004 letter, that letter speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with that letter, such allegations are specifically denied. To the extent the allegations in paragraph 17 concern the Board of Medical Practice's investigation, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore, such allegations are denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

23. Denied.

24. Denied.

25. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 25 and therefore, such allegations are denied.

26. Admitted that Patient A received medical care from Respondent, that he was in his mid-50's and reported living in [REDACTED] for some of the time he was Respondent's patient. Admitted that Respondent began providing medical care for Patient A on or around October 2006 and continuing through March 2009, in a manner consistent with accepted and proper medical practice. Denied as stated that Respondent "prescribed large quantities of narcotics for him" and "was still prescribing narcotics for Patient A" as of March 2009. The initial visit SOAP note referenced speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with that note, such allegations are specifically denied.

27. The chart note referenced speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with that note, such allegations are specifically denied. The chart notes referenced in footnote 4 also speak for themselves. To the extent the allegations contained in footnote 4 of this paragraph are inconsistent with those notes, such allegations are specifically denied. The remaining allegations in footnote 4 to paragraph 27 are denied.

28. Denied.

29. Denied.

30. The prescriptions identified in the chart note and copies of prescriptions speak for themselves. To the extent the allegations contained in this paragraph are inconsistent with the note and prescriptions, such allegations are specifically denied. The remaining allegations in paragraph 30 are denied.

31. The first sentence of this paragraph is denied. Admitted that Respondent provided medical care for Patient A from on or about October 2006 through March 2009, in a manner consistent with accepted and proper medical practice, including prescribing the medications identified in this paragraph. The remaining allegations in paragraph 31 are denied. To the extent footnotes 6-11 provide drug descriptions from various publications, those publications speak for themselves. To the extent the allegations contained in this paragraph are inconsistent with such referenced publications, such allegations are specifically denied.

32. Denied.

33. Denied.

34. Denied as stated.

35. Denied.

36. Denied.

37. Admitted that there was no written narcotics contract with Patient A as alleged.

38. Denied.

39. It is admitted that for each patient visit and where prescriptions were photocopied, each and every prescription for narcotics may not have been separately written on a patient chart. The second and third sentences of paragraph 39 are denied as stated.

40. Denied as stated.

41. Denied that this paragraph accurately describes any requirement imposed on Respondent by the Board.

42. Denied as stated.

43. Denied.

44. Denied as stated.

45. Admitted that a flow chart as referenced in this paragraph was not used by Respondent. The remaining allegations in paragraph 45 are denied.

46. Denied.

47. Denied.

48. Admitted that on April 25, 2007, Respondent prescribed Fluoxetine 40mg for Patient A to be renewed for six months. The office note for the April 25, 2007 appointment speaks for itself. Denied that there was no medical basis for this prescription, no inquiry to the patient regarding symptoms, psychiatric functioning, past care or counseling, and that there was no assessment or treatment plan related to prescribing the Fluoxetine to this patient. To the extent footnote 12 provides a drug description from the Physician's Desk Reference, that publication speak for itself. To the extent the allegations contained in this paragraph are inconsistent with such referenced publications, such allegations are specifically denied.

49. Admitted that Respondent provided medical care for Patient A from on or about October 2006 through March 2009, in a manner consistent with accepted and proper medical practice, including the prescribing of medications, including narcotics. The remaining allegations are denied.

50. Admitted.

51. The chart note referenced speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with that note, such allegations are specifically denied.

Admitted that there is no documentation of patient's weight. Denied that Respondent failed to take Patient B's blood pressure and document the results as alleged in this paragraph.

52. The chart note referenced speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with that note, such allegations are specifically denied.

Admitted that Respondent provided medical care for Patient B in a manner consistent with accepted and proper medical practice, including the prescribing of medications, including narcotics. The remaining allegations are denied.

53. The first and second sentences of paragraph 53 are denied. The third sentence of paragraph 53 is denied as stated.

54. The first and second sentences of paragraph 54 are denied. The third sentence of paragraph 54 is admitted.

55. The first, second, third and fourth sentences of paragraph 55 are admitted to the extent consistent with Respondent's medical records; and are otherwise denied. The remaining allegations in paragraph 55 are denied.

56. Denied.

57. Denied.

58. Denied as stated.

59. Denied.

60. Denied.

61. Admitted that there was no written narcotics contract with Patient B as alleged.

62. Denied.

63. It is admitted that for each patient visit and where prescriptions were photocopied, each and every prescription for narcotics may not have been separately written on a patient chart. The remaining allegations in this paragraph are denied as stated.

64. Denied as stated.

65. Denied that the first sentence of this paragraph accurately describes any requirement imposed on Respondent by the Board. Admitted that Respondent could not provide the Board with copies of the “paper chart,” in addition to the electronic chart that was provided, because, at Patient B’s request, Respondent provided the original “paper chart” to her in order to facilitate transfer of her care to another provider.

66. Denied.

67. Denied.

68. Denied as stated.

69. Admitted that a flow chart as referenced in this paragraph was not used by Respondent. The remaining allegations in paragraph 69 are denied.

70. Denied as stated.

71. Denied.

72. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in the first three sentences of paragraph 72 and therefore, such allegations are denied. The allegations in the fourth sentence of paragraph 72 are admitted.

73. The first sentence of paragraph 73 is denied. The second sentence of paragraph 73 is denied as stated. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations in the third sentence of paragraph 73 and therefore, such allegations are denied. The last sentence of this paragraph is denied.

74. Admitted.

75. The chart note referenced speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with that note, such allegations are specifically denied.

76. As to the first sentence of paragraph 76, the chart note referenced speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with that note, such allegations are specifically denied. The remaining allegations in paragraph 76 are denied.

77. The first sentence of paragraph 77 is admitted. The second sentence in paragraph 77 is denied. The third sentence is admitted. Admitted that based on a subjective and objective assessment of her medical needs and consistent with accepted and proper medical practice, Respondent prescribed “percocet 5/325 #90” to Patient C. Any remaining allegations are denied.

78. The first sentence of paragraph 78 denied. Admitted that there is no documentation of patient’s weight and height. Denied that Respondent failed to take Patient C’s blood pressure and document the results as alleged in this paragraph. The allegations in the third sentence of paragraph 78 are denied. The allegation in the fourth sentence that the October 27, 2006 note does not document an inquiry regarding psychological functioning is admitted, but Respondent denies that this note fails to document an inquiry as to the effects of the Patient’s pain on her physical functioning. Respondent admits that the October 27, 2006 note does not document that he discussed risks and benefits of the narcotic medication prescribed Patient C.

79. Denied that the October 27, 2006 office note does not address or document past treatment for pain received, use of medications, or the medical indication and rationale for Respondent’s prescribing of narcotic medications. Admitted that the note does not document any inquiry regarding any past substance abuse. Admitted that no follow up care was planned as of the date of this note. The remaining allegations in this paragraph are denied.

80. Admitted that Respondent provided medical care for Patient C from on or about October 27, 2006 through February 2008, in a manner consistent with accepted and proper medical practice, including the prescribing of medications. The second and third sentences of paragraph 80 are admitted. The last sentence of this paragraph is denied as stated.

81. Denied.

82. Denied.

83. Denied.

84. Denied as stated.

85. Denied.

86. Denied that Respondent failed to evaluate and/or document careful examination of Patient C's pain, assessment of underlying causes, past treatment for pain or the effect of pain on the patient's physical and psychological functioning. Any remaining allegations in paragraph 86 are denied.

87. Admitted that there was no written narcotics contract with Patient C as alleged.

88. Denied.

89. It is admitted that for each patient visit and where prescriptions were photocopied, each and every prescription for narcotics may not have been separately written on a patient chart. The second and third sentences of paragraph 89 are denied as stated.

90. Denied as stated.

91. Denied that this paragraph accurately describes any requirement imposed on Respondent by the Board.

92. Denied as stated.

93. The first sentence in paragraph 93 is denied as stated. The second sentence in paragraph 93 is denied.

94. Denied as stated.

95. Admitted that a flow chart as referenced in this paragraph was not used by Respondent. The remaining allegations in paragraph 95 are denied.

96. Denied as stated.

97. The first and second sentences of paragraph 97 are admitted. The third sentence is denied. Admitted that Respondent provided medical care for Patient D from approximately 1999 through March 2009, in a manner consistent with accepted and proper medical practice, including the prescribing of medications, including narcotics and for, among other things, the condition identified. Denied that Respondent “usually” saw Patient D every week to 10 days. Admitted that Respondent prescribed narcotics to Patient D on March 12, 2009.

98. The first sentence of paragraph 98 is denied. The second sentence is denied as stated. To the extent footnote 15 provides a drug description from the Physician’s Desk Reference, that publication speak for itself. To the extent the allegations contained in this paragraph are inconsistent with such referenced publications, such allegations are specifically denied. The third sentence of paragraph 98 is denied.

99. Denied.

100. Denied.

101. Denied as stated.

102. Denied.

103. Denied.

104. Denied.

105. Denied.

106. It is admitted that for each patient visit and where prescriptions were photocopied, each and every prescription for narcotics may not have been separately written on a patient chart.

The second, third and fourth sentences of paragraph 106 are denied as stated.

107. Denied as stated.

108. Denied as stated.

109. Denied that this paragraph accurately describes any requirement imposed on Respondent by the Board.

110. The first sentence of paragraph 110 is denied. The second sentence of paragraph 110 is denied as stated.

111. Denied.

112. Denied as stated.

113. Admitted that a flow chart as referenced in this paragraph was not used by Respondent. The remaining allegations in paragraph 113 are denied.

114. Denied as stated.

115. Denied.

116. Denied as stated.

117. The first, second and third sentences of paragraph 117 are admitted. As to the fourth sentence, it is admitted that Respondent provided medical care for Patient E from on or about March 26, 2004 through approximately February, 2009, in a manner consistent with accepted and proper medical practice, including the prescribing of medications, including narcotics. Any remaining allegations are denied.

118. The first sentence is denied. The second sentence is denied as stated. The third sentence of paragraph 118 is admitted. To the extent footnote 16 provides a drug description from the Physician's Desk Reference and other sources, those publications speak for themselves. To the extent the allegations contained in this paragraph are inconsistent with such referenced publications, such allegations are specifically denied. The fourth sentence of paragraph 118 is denied.

119. Denied.

120. Denied as stated.

121. Denied as stated.

122. Denied.

123. Denied that Respondent failed to evaluate and/or document careful examination of Patient E's pain, assessment of underlying causes, past treatment for pain or the effect of pain on the patient's physical and psychological functioning. Any remaining allegations in paragraph 123 are denied.

124. Admitted that there was no written narcotics contract with Patient E as alleged.

125. Denied.

126. It is admitted that for each patient visit and where prescriptions were photocopied, each and every prescription for narcotics may not have been separately written on a patient chart.

127. Denied that this paragraph accurately describes any requirement imposed on Respondent by the Board.

128. Denied as stated.

129. Denied.

130. Denied as stated.

131. Admitted that a flow chart as referenced in this paragraph was not used by Respondent. The remaining allegations in paragraph 131 are denied.

132. Denied as stated.

133. It is admitted that Respondent provided medical care for Patient F (who was between 40 and 50 during her care) for the conditions listed from on or about 2002 through until at least October 14, 2008, in a manner consistent with accepted and proper medical practice, including the prescribing of medications, including narcotics. The remaining allegations are denied.

134. The first sentence of this paragraph is denied. The second sentence is denied as stated. To the extent footnote 17 provides a drug description from the Physician's Desk Reference, that publication speak for itself. To the extent the allegations contained in this paragraph are inconsistent with such referenced publications, such allegations are specifically denied. The third sentence of this paragraph is denied.

135. Denied.

136. Denied.

137. Denied as stated.

138. Denied.

139. Denied as stated.

140. Admitted that there was no signed written narcotics contract with Patient F. The documentation in her medical chart speaks for itself. Otherwise denied.

141. Denied.

142. It is admitted that for each patient visit and where prescriptions were photocopied, each and every prescription for narcotics may not have been separately written on a patient chart.

143. Denied as stated.

144. Denied that this paragraph accurately describes any requirement imposed on Respondent by the Board.

145. The first sentence in this paragraph is denied. Denied that there was no documented reason for the medication taper in the October 14, 2008 note, admitted that the note for the February 25, 2008 visit does not itself document a reason for the reference to medication taper. The third sentence in paragraph 145 is denied.

146. Admitted that a flow chart as referenced in this paragraph was not used by Respondent. The remaining allegations in paragraph 146 are denied.

147. Admitted that there may have been notes for this patient not filed in the chart before it was copied and produced pursuant to specific requests for portions of her chart, but denied as stated that “Respondent failed to produce to the Board of Medical Practice all medical charts he prepared for his care of Patient F.”

148. Denied.

149. Denied as stated.

150. The first sentence of this paragraph is admitted. It is admitted that Respondent provided medical care for Patient G for the conditions listed from on or about late-2004 through until at least September 26, 2008, in a manner consistent with accepted and proper medical practice, including the prescribing of medications, including narcotics. The remaining allegations are denied.

151. The first sentence of this paragraph is denied. The second sentence is denied as stated. The third sentence of this paragraph is denied.

152. Denied.

153. Denied.

154. Denied as stated.

155. Denied.

156. Denied.

157. Denied as stated.

158. Denied as stated.

159. It is admitted that for each patient visit and where prescriptions were photocopied, each and every prescription for narcotics may not have been separately written on a patient chart.

160. Denied as stated.

161. Denied that this paragraph accurately describes any requirement imposed on Respondent by the Board.

162. Denied as stated.

163. Denied.

164. The first and second sentences of this paragraph are denied as stated. It is admitted that there was no signed written narcotics contract with Patient G as alleged.

165. Admitted that a flow chart as referenced in this paragraph was not used by Respondent. The remaining allegations in paragraph 165 are denied.

166. Denied as stated.

167. It is admitted that Respondent provided medical care for Patient H (who was in her 50s during her care) for the conditions listed from approximately August 2005 through until at least September, 25, 2008, in a manner consistent with accepted and proper medical practice, including the prescribing of medications, including narcotics at various times. The remaining allegations are denied.

168. The first sentence of this paragraph is denied. The second sentence is denied as stated. The third sentence of this paragraph is denied.

169. Denied.

170. Denied.

171. Denied as stated.

172. Denied.

173. Denied.

174. Denied as stated.

175. Denied.

176. Denied that this paragraph accurately describes any requirement imposed on Respondent by the Board.

177. Denied as stated.

178. Denied.

179. Denied as stated.

180. Admitted that a flow chart as referenced in this paragraph was not used by Respondent. The remaining allegations in paragraph 180 are denied.

181. Denied.

182. Admitted that there may have been notes for this patient not filed in the chart before it was copied and produced pursuant to specific requests for portions of her chart, but denied as stated that “Respondent failed to produce to the Board of Medical Practice all medical charts he prepared for his care of Patient H.”

183. Denied as stated.

184. It is admitted that Respondent provided medical care for Patient I (who was in his late-20s during his care) from approximately September 2004 through until approximately November, 2007, in a manner consistent with accepted and proper medical practice, including the prescribing of medications, including narcotics. Admitted that the medical records state his residence as [REDACTED], [REDACTED] and list the various medical conditions listed in paragraph 184. The remaining allegations are denied.

185. The first sentence of this paragraph is denied. The second sentence is denied as stated. The third sentence of this paragraph is denied.

186. Denied.

187. Denied.

188. Denied as stated.

189. Denied.

190. Denied.

191. The first sentence of this paragraph is denied as stated. The second sentence is denied.

192. Denied.

193. Denied.

194. The first and second sentences of this paragraph are denied as stated. Admitted that there was no signed written narcotics contract with Patient I as alleged.

195. Admitted that a flow chart as referenced in this paragraph was not used by Respondent. The remaining allegations in paragraph 195 are denied.

196. Denied.

197. Denied as stated.

198. The first sentence of paragraph 198 is denied as stated. It is admitted that Respondent provided medical care for Patient J (who was between 30 and 40 during her care) for the conditions listed from 2002 (and before) through until 2008, in a manner consistent with accepted and proper medical practice, including the prescribing of medications, including the narcotics identified by name. The chart notes referenced speak for themselves. To the extent the allegations contained in this paragraph are inconsistent with such notes, such allegations are specifically denied. The remaining allegations are denied.

199. Denied.

200. Denied.

201. Denied.

202. Denied as stated.

203. Denied.

204. Denied that Respondent failed to evaluate and/or document careful examination of Patient J's pain, assessment of underlying causes, past treatment for pain or the effect of pain on the patient's physical and psychological functioning. Any remaining allegations in paragraph 204 are denied.

205. Denied.

206. Denied.

207. It is admitted that for each patient visit and where prescriptions were photocopied, each and every prescription for narcotics may not have been separately written on a patient chart.

208. Denied that this paragraph accurately describes any requirement imposed on Respondent by the Board.

209. Denied as stated.

210. The first sentence in paragraph 210 is denied as stated. The second sentence is denied.

211. Denied.

212. The first and second sentences of paragraph 212 are denied as stated. Admitted that a flow chart as referenced in this paragraph was not used by Respondent. The remaining allegations in paragraph 212 are denied.

213. The specific chart notes referenced in this paragraph speak for themselves. To the extent the allegations contained in this paragraph are inconsistent with those notes, such allegations are specifically denied.

214. Respondent denies the first sentence in paragraph 214. The second sentence is denied as stated. To the extent the second sentence refers to chart notes, those referenced notes speak for themselves. The remaining allegations in this paragraph are denied.

215. The notes and copies of prescriptions referenced in this paragraph speak for themselves. To the extent the allegations contained in this paragraph are inconsistent with those notes, such allegations are specifically denied. The remaining allegations in this paragraph are denied.

216. The June 2, 2008 and September 15, 2008 notes speak for themselves. To the extent the allegations contained in this paragraph are inconsistent with those notes, such allegations are specifically denied. The remaining allegations in this paragraph are denied.

217. Admitted that there was no signed written narcotics contract with Patient J as alleged. The remaining allegations in this paragraph are denied.

218. The April 26, 2004 letter speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with the April 26, 2004 letter, such allegations are specifically denied.

219. Respondent admits that the investigator for the Vermont Board of Medical Practice questioned him as alleged, but Respondent does recall the exact date of that inquiry. Respondent does not recall the details of the conversation he had with the Board investigator about this inquiry, but does admit that he did tell the investigator that he had never personally met Dr. Seddon Savage and that he personally had not had direct contact or communication with her. To the extent the remaining allegations in paragraph 219 concern the Board of Medical Practice's investigation, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore, such allegations are denied.

220. The first sentence of this paragraph is admitted. The second, third and fourth sentences are denied as stated.

221. Denied.

222. The April 26, 2004 letter speaks for itself. To the extent the allegations contained in this paragraph are inconsistent with the April 26, 2004 letter, such allegations are specifically denied. The remaining allegations in paragraph 222 are denied.

223. Denied.

224. Denied.

225. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

226. Denied.

227. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

228. Denied.

229. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

230. Denied.

231. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

232. Denied.

233. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

234. Denied.

235. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

236. Denied.

237. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

238. Denied.

239. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

240. Denied.

241. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

242. Denied.

243. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

244. Denied.

245. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

246. Denied.

247. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

248. Denied.

249. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

250. Denied.

251. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

252. Denied.

253. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

254. Denied.

255. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

256. Denied.

257. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

258. Denied.

259. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

260. Denied.

261. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

262. Denied.

263. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

264. Denied.

265. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

266. Denied.

267. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

268. Denied.

269. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

270. Denied.

271. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

272. Denied.

273. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

274. Denied.

275. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

276. Denied.

277. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

278. Denied.

279. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

280. Denied.

281. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

282. Denied.

283. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

284. Denied.

285. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

286. Denied.

287. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

288. Denied.

289. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

290. Denied.

291. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

292. Denied.

293. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

294. Denied.

295. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

296. Denied.

297. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

298. Denied.

299. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

300. Denied.

301. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

302. Denied.

303. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

304. Denied.

305. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

306. Denied.

307. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

308. Denied.

309. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

310. Denied.

311. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

312. Denied.

313. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

314. Denied.

315. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

316. Denied.

317. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

318. Denied.

319. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

320. Denied.

321. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

322. Denied.

323. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

324. Denied.

325. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

326. Denied.

327. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

328. Denied.

329. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

330. Denied.

333. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

334. Denied.

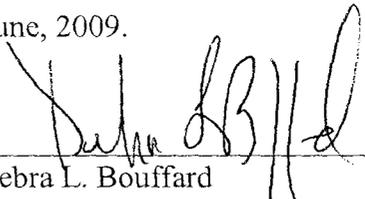
335. Respondent hereby repeats and incorporates the responses contained in paragraphs 4 through 224, above.

336. Denied.

WHEREFORE, Respondent requests that the Board dismiss the charges brought by the State of Vermont, reinstate his license, and grant such other relief to Respondent as it deems just and proper.

Dated at Burlington, Vermont this 5th day of June, 2009.

By:



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