

**CONSENT AGREEMENT  
BETWEEN  
SAUL M. GREENBERG, PH.D.  
AND THE  
OHIO COUNSELOR AND SOCIAL WORKER BOARD**

This CONSENT AGREEMENT is entered into by and between SAUL M. GREENBERG, PH.D. hereinafter ("**GREENBERG**") and the OHIO STATE COUNSELOR AND SOCIAL WORKER BOARD hereinafter ("**BOARD**"), the state agency charged with enforcing Chapter 4757 of the Ohio Revised Code, and all rules promulgated thereunder.

**GREENBERG** hereby acknowledges that he has read and understands this CONSENT AGREEMENT and has voluntarily entered into it without threat or promise by the **BOARD** or any of its members, employees, or agents.

**GREENBERG** is fully aware of his rights, including his right to be advised by counsel and his right to a hearing pursuant to Chapter 119 of the Ohio Revised Code, on the issues which are the subject of this CONSENT AGREEMENT.

This CONSENT AGREEMENT contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise, which varies the terms of this CONSENT AGREEMENT.

This CONSENT AGREEMENT is entered into on the basis of the following STATEMENT AND UNDERSTANDINGS:

1. **GREENBERG** was a counselor licensed to practice counseling in the state of Ohio, and <sup>was</sup> ~~is~~ subject to the laws and rules of Ohio regulating the practice of counseling work as outlined in R.C. 4757.
2. On March 22, 1995, the **BOARD** brought formal charges against **GREENBERG** when the **BOARD** issued the Notice for Opportunity of Hearing. An administrative hearing was requested, which hearing was scheduled and continued to allow the parties to negotiate a settlement.
3. In the March 22, 1995 Notice for Opportunity of Hearing **GREENBERG** was charged with violating the rules governing counselors by being found guilty of attempted insurance fraud, a misdemeanor of the first degree, by the Clark County Court of Common Pleas on August 24, 1994.

4. **GREENBERG** admits the allegations of the March 22, 1995 Notice for Opportunity of Hearing. Wherefore, in consideration of the foregoing AGREEMENT, and in lieu of any formal disciplinary proceedings, **GREENBERG** knowingly and voluntarily agrees with the **BOARD** to the following terms and conditions:
- A. The **BOARD** will receive **GREENBERG**'s license as a LPCC to practice counseling in the state of Ohio.
  - B. **GREENBERG** agrees to not apply to the **BOARD** for a license as a social worker or counselor at any time in the future.

It is hereby agreed by and between both parties that this CONSENT AGREEMENT hereby settles all issues contained in the March 22, 1995 Notice of Opportunity for Hearing issued to **SAUL M. GREENBERG**.

By his signature on this AGREEMENT, **GREENBERG** agrees that in the event the **BOARD**, in its discretion, does not approve this CONSENT AGREEMENT, this settlement offer is withdrawn and shall be of no evidentiary value and shall not be relied upon or introduced in any disciplinary action or appeal by either party. **GREENBERG** agrees that should the **BOARD** reject this CONSENT AGREEMENT and if this case proceeds to hearing, he will assert no claim that the **BOARD** was prejudiced by its review and discussion of this CONSENT AGREEMENT or of any information relating thereto.

**GREENBERG** hereby releases the members of the **BOARD**, its officers and employees jointly and severally, from any and all liability arising from the within matter.

The **BOARD** shall incorporate this **CONSENT AGREEMENT** into a formal Journal Entry at its March 1996 meeting.

This **CONSENT AGREEMENT** shall take effect upon the last signature below:

THE OHIO STATE COUNSELOR AND  
SOCIAL WORKER BOARD

*Saul M. Greenberg per attached  
Friends approval 3-12-96 by  
Gregory K. Lind*  
\_\_\_\_\_  
SAUL M. GREENBERG

*Glenn Abraham*  
\_\_\_\_\_  
GLENN ABRAHAM  
Chair, Counselor and Social Worker Board

*3/12/96*  
\_\_\_\_\_  
DATE

*4-22-96*  
\_\_\_\_\_  
DATE

*Gregory K. Lind #0055227*  
\_\_\_\_\_  
GREGORY K. LIND  
Counsel for Saul M. Greenberg

*Elizabeth Y. Collis*  
\_\_\_\_\_  
ELIZABETH Y. COLLIS  
Assistant Attorney General  
Counsel for Counselor and Social  
Worker Board

*3/13/96*  
\_\_\_\_\_  
DATE

*3/11/96*  
\_\_\_\_\_  
DATE