

**STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION**

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois,)	
v.)	
Mark G. Lewis, M.D.,)	No. 2012-08097
License No. 036-074413/336-037910,)	
	Respondent.)	

NOTICE OF TEMPORARY SUSPENSION

To: Mark G. Lewis, M.D.

PLEASE TAKE NOTICE that the Director of the Division of Professional Regulation of the State of Illinois signed the attached ORDER which provides that your Illinois Physician and Surgeon License No. 036-074413 and Illinois Controlled Substance License No. 336-037910 are **TEMPORARILY SUSPENDED**. Copies of the ORDER, Petition, Complaint and Affidavits on which it is based, are attached.

FURTHERMORE, on **July 9, 2014 at 10:00 am** the Medical Disciplinary Board of the Department of Financial and Professional Regulation of the State of Illinois will hold a hearing at 100 W. Randolph Street, Suite 9-300, Chicago, Illinois 60601, to determine the truth of the charges set forth in the attached Complaint. At the hearing you will be given an opportunity to present such statements, testimony, evidence and argument as may be pertinent to or in defense to the charges.

It is required that you appear at the hearing unless the matter is continued in advance. Failure to attend the hearing at the time and place as stated above may result in a decision being made, in your absence, to continue the suspension of your license. You have the right to retain counsel to represent you in this matter and, in the opinion of this Department; it is advisable to be represented by a lawyer.

It is required that you file a VERIFIED ANSWER to the attached Complaint with the Department of Financial and Professional Regulation by the date of the hearing.

No CONTINUANCE of a hearing will be granted except at the discretion of the Committee or Board. A written motion for continuance must be served on the

Department of Financial and Professional Regulation at least three (3) business days before the date set for the Hearing and must set forth the reasons why holding the hearing on the date indicated will cause undue hardship.

Your ANSWER, your lawyer's APPEARANCE, and all MOTIONS or papers should be filed with the Clerk of the Court of the Department of Financial and Professional Regulation, at 100 W. Randolph Street, Suite 9-300, Chicago, IL 60601.

RULES OF PRACTICE IN ADMINISTRATIVE HEARINGS IN THE DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION BEFORE COMMITTEES OR BOARDS OF SAID DEPARTMENT are accessible at <http://www.idfpr.com/PROFS/Info/Physicians.asp> or available upon request.

**DEPARTMENT OF FINANCIAL AND
PROFESSIONAL REGULATION of the State of
Illinois**

By: 

Laura E. Forester
Chief of Medical Prosecution

Vladimir Lozovskiy
Staff Attorney
Department of Financial and Professional Regulation
Division of Professional Regulation
100 West Randolph, Suite 9-300
Chicago, Illinois 60601
312/814-1691

**STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION**

DEPARTMENT OF FINANCIAL AND)	
PROFESSIONAL REGULATION)	
of the State of Illinois,)	Complainant,
v.)	No. 2012-08097
Mark G. Lewis, M.D.,)	
License Nos. 036.074413/336.037910,)	Respondent.

ORDER

This matter having come before the Director of the Division of Professional Regulation of the State of Illinois, on a Petition filed by the Chief of Medical Prosecutions of the Division, which requested Temporary Suspension of the Illinois Physician and Surgeon License No. 036.074413 and the Illinois Controlled Substance License No. 336.037910 of Respondent, Mark G. Lewis, M.D., and the Director, having examined the Petition, finds that the public interest, safety and welfare imperatively require emergency action to prevent the continued practice of Mark G. Lewis, M.D., Respondent, in that Respondent's actions constitute an immediate danger to the public.

NOW, THEREFORE, I, JAY STEWART, DIRECTOR OF THE DIVISION OF PROFESSIONAL REGULATION of the State of Illinois, hereby ORDER that the Illinois Physician and Surgeon License No. 036.074413 and the Illinois Controlled Substance License No. 336.037910 of Respondent, Mark G. Lewis, M.D., to practice medicine as a Physician and Surgeon in the State of Illinois be **SUSPENDED**, pending proceedings before an Administrative Law Judge at the Department of Financial and Professional Regulation and the Medical Disciplinary Board of the State of Illinois.

I FURTHER ORDER that Respondent shall immediately surrender all indicia of licensure to the Department.

I FURTHER ORDER that Respondent shall immediately surrender all indicia of
licensure to the Department.

DATED THIS 26th DAY OF June, 2014.

**DEPARTMENT OF FINANCIAL AND
PROFESSIONAL REGULATION of the State of
Illinois
Division of Professional Regulation**



JAY STEWART
Director

Ref: IDFPR Case No. 2012-08097/License No. 036.074413
and CS License No. 336.037910

**STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION**

DEPARTMENT OF FINANCIAL AND)	
PROFESSIONAL REGULATION)	
of the State of Illinois,	Complainant,)	
v.)	No. 2012-08097
Mark G. Lewis, M.D.,)	
License Nos. 036-074413/336-037910,	Respondent.)	

PETITION FOR TEMPORARY SUSPENSION

NOW COMES the Complainant, by its Chief of Medical Prosecutions, Laura E. Forester, and Petitions JAY STEWART, Director of the Division of Professional Regulation, Department of Financial and Professional Regulation of the State of Illinois, pursuant to 225 ILCS 60/37 to issue an Order for Temporary Suspension of the Physician and Surgeon License and Controlled Substance Licenses of Mark G. Lewis, M.D., Respondent. In support of said Petition, Petitioner alleges as follows:

1. Respondent is presently the holder of a Certificate of Registration as a Physician and Surgeon in the State of Illinois, License No. 036-07413, and Controlled Substance License No. 336-037910 issued by the Department of Financial and Professional Regulation of the State of Illinois. Said Licenses are presently in active status.
2. Information has come to the Department's attention that Respondent has engaged in sexually inappropriate conduct with several patients of his medical practice.

3. Specifically, patient J.S. admitted during the interview with the Department's Investigator that she engaged in a sexual relationship with Respondent while Respondent continued to provide care and treatment for her.
4. Moreover, Respondent himself admitted that he had a sexual relationship with an ex-patient of his practice, A.M. a/k/a A.S. Respondent admitted that he hired A.M. to work in his office and continued to prescribe Controlled Substance medications for her. In addition, the review of patient A.M.'s medical records from Respondent's office indicate that Respondent continued to prescribe highly addictive and abused Controlled Substances, such as Norco and Xanax, for patient A.M. knowing that patient A.M. was abusing Controlled Substances and forging Respondent's prescriptions.
5. In addition, the Department's investigation revealed that Respondent issued and/or authorized various prescriptions for highly addictive and abused Controlled Substances for individuals who were not Respondent's patients.
6. Moreover, Respondent acknowledged that he has engaged in sexual relationships with several ex-patients, including his ex-wife and his current common law wife.
7. In addition, patient K.G. contacted the Aurora Police Department in June 2012 regarding Respondent sending inappropriate text messages of a sexual nature to her.
8. Finally, J.K. who consulted Respondent regarding her stomach problems, contacted the St. Charles Police Department in November 2012 and indicated that while she was at Respondent's personal residence, she was sexually assaulted by Respondent. Subsequently, Respondent was required to submit a DNA Sample pursuant to the

September 2013 Kane County Grand Jury Subpoena to compare his DNA to DNA obtained from anal swabs taken from J.K. as part of a rape kit.

9. On June 9, 2014, the Illinois State Police, Division of Forensic Services issued a Laboratory Report revealing that the DNA profile identified in the anal swabs (semen identified) taken from J.K. match the DNA profile of Respondent.
10. During the March 2014 interview with the Department's Investigator Respondent denied having any sexual relationship with J. K.
11. John Zander, M.D., Deputy Chief Medical Coordinator of the Illinois Department of Financial and Professional Regulations, Division of Professional Regulation, has been consulted in this matter and believes that the continued practice of medicine by Respondent, Mark G. Lewis, M.D., presents an immediate danger to the safety of the public in the State of Illinois. See the Department's Exhibit A, attached hereto and made a part of this Petition.

Petitioner further alleges that the public interest, safety and welfare imperatively require emergency action, in that Respondent's continued practice of medicine constitutes an immediate danger to the public.

WHEREFORE, Petitioner prays that the Physician and Surgeon License and Controlled Substance License of Mark G. Lewis, M.D., be Temporarily Suspended pending proceedings before the Medical Disciplinary Board of the State of Illinois.

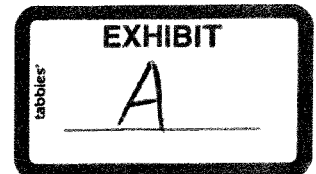
**DEPARTMENT OF FINANCIAL AND
PROFESSIONAL REGULATION of the State of
Illinois**

By: 

Laura E. Forester
Chief of Medical Prosecutions

Vladimir Lozovskiy
Staff Attorney, Medical Prosecution Unit
Department of Financial and Professional Regulation
Division of Professional Regulation
100 West Randolph, Suite 9-300
Chicago, Illinois 60601
312/814-1691

Respondent.)



a/k/a A.S.

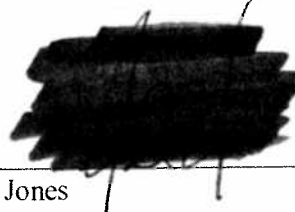
4. I also obtained copies of the Aurora Police Department Investigative Reports indicating that patient K.G. contacted the Aurora Police Department in June 2012 regarding Respondent sending inappropriate text messages of a sexual nature to her.
5. I also obtained copies of the St. Charles Police Department Investigative Reports indicating that J.K., who consulted Respondent regarding her medical problems, contacted the St. Charles Police Department in November 2012, and indicating that while she was at Respondent's personal residence, she was sexually assaulted by Respondent. Subsequently, Respondent was required to submit a DNA Sample pursuant to the September 2013 Kane County Grand Jury Subpoena to compare DNA from anal swabs obtained from J.K. as part of a rape kit.
6. I also obtained copies of prescriptions for various Controlled Substances authorized by Respondent as well as subpoenaed Respondent's medical records for multiple patients of his practice. I learned that Respondent authorized prescriptions for Controlled Substances for individuals who were not his patients as well as self-prescribed Controlled Substances.
7. On March 12, 2014, I along with the Illinois State Police Special Agent Alejandre interviewed Respondent. During the interview, Respondent admitted to having a romantic relationship with patient A.M. but indicated that he was not her doctor when they were romantically involved. Respondent was unable to recall when he became romantically involved with patient A.M. Moreover, Respondent acknowledged that he hired patient A.M. and continued to treat her while she worked for him. In addition, Respondent admitted to continued prescribing of Controlled Substances, including Percocet and Xanax, for patient A.M. knowing that patient A.M. was forging Respondent's prescriptions. Moreover,

Respondent acknowledged that he has engaged in a sexual relationship with several ex-patients, including his ex-wife and his current common law wife. Finally, Respondent denied having sex with J.K.

8. On April 22, 2014, I along with SA Alejandro and DEA DI Mele interviewed J.K. who indicated that she consulted Respondent on several occasions when she was having problems with her stomach and Respondent gave her a diagnosis and treatment plan. She also indicated that on the night in question, she consumed two glasses of wine and one small glass of Makers Mark whiskey that Respondent prepared for her. After that J.K. felt woozy and woke up with her pants and underwear off and Respondent was laying next to her on the floor. Subsequently, J.K. went to Centegra Hospital in Woodstock, Illinois and the police were notified.

9. On April 28, 2014, I interviewed patient J.S. who admitted that she engaged in a sexual relationship with Respondent while he was her treating physician.

10. On June 23, 2014, I received a Illinois State Police, Division of Forensic Services Laboratory Report dated June 9, 2014, which revealed that the DNA profile identified in the anal swabs (semen identified) from J.K. matched the DNA profile of Respondent.



Joseph M. Jones
Affiant

Subscribed and sworn to before me
this 26th day of June 2014.



NOTARY PUBLIC



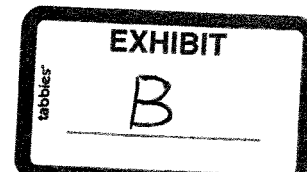
**STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION**

DEPARTMENT OF FINANCIAL AND)	
PROFESSIONAL REGULATION)	
of the State of Illinois.	Complainant,)	
v.)	No. 2012-08097
Mark G. Lewis, M.D.,)	
License No. 036-074413/336-037910.	Respondent.)	

AFFIDAVIT OF JOHN ZANDER, M.D.

I, John Zander, M.D., being duly sworn upon oath, depose and make this Affidavit on my personal knowledge, and if sworn as a witness in this matter I would competently testify to the following facts:

1. I am a Physician licensed to practice medicine in the State of Illinois. I have been a licensed Physician for approximately forty two years.
2. I am currently a Deputy Chief Medical Coordinator of the Illinois Department of Financial and Professional Regulation, Division of Professional Regulation.
3. I have reviewed Department's Investigative reports along with the Illinois State Police Investigative reports and the St. Charles Police Investigative reports regarding Respondent.
4. I also reviewed Department Investigator Joseph M. Jones Affidavit regarding the Department's investigation of Respondent's inappropriate prescribing of Controlled Substances and sexually inappropriate conduct with his patients/ex-patients.
5. I learned that the Department received information that Respondent continued to prescribe and/or authorize multiple Controlled Substances for patient A.M. even after Respondent learned that patient A.M. was obtaining Controlled Substances by



forging Respondent's prescriptions. I also learned that Respondent hired patient A.M. to work in his office and acknowledged that he became romantically involved with patient A.M. after he stopped being her physician.

6. I also learned that the St. Charles Police Department has active investigation involving Respondent based on allegations that he sexually assaulted J.K. while she was visiting his personal residence. Respondent was required to submit DNA Sample pursuant to the September 2013 Kane County Grand Jury Subpoena to compare DNA from anal swabs obtained from J.K. I reviewed Illinois State Police, Division of Forensic Services Laboratory Report dating June 9, 2014 which revealed that DNA profile identified in anal swabs (semen identified) from J.K. matched the DNA profile of Respondent.
7. Based on the foregoing I am of the opinion to a reasonable degree of medical certainty that the continued practice of medicine by Mark G. Lewis, M.D., presents an immediate danger to the safety of the public in the State of Illinois.

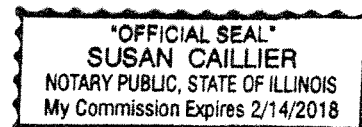


John Zander, M.D.
Affiant

Subscribed and sworn to before me
this 25th day of June 2014.



NOTARY PUBLIC





Amy Morgan

Family Doctor
2137 Elm Street
Knoxville, TN 37914

MARK G. LEWIS, M.D.
BL 1404502
REBECCA GUIDO, C.N.P.
Office (606) 232-7500
Fax (606) 232-7541

DATE OF BIRTH: 2/28/1995 DATE: 9/12/11

R Gersonic # thirty
Narc 10/325

1/10 b.i.d. - b.i.d. per

week per

PRESCRIBING SIGNATURE: M. Gersonic M.D.

☒ MAY SUBSTITUTE ☐ MAY NOT SUBSTITUTE

☐ MAY REFILL ☒ TIMES

DeTC

**STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION**

DEPARTMENT OF FINANCIAL AND)	
PROFESSIONAL REGULATION)	
of the State of Illinois,)	Complainant,
v.)	No. 2012-08097
Mark G. Lewis, M.D.,)	
License No. 036-074413/336-037910,)	Respondent.

COMPLAINT

NOW COMES the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF PROFESSIONAL REGULATION, of the State of Illinois, by its Chief of Medical Prosecutions, Laura E. Forester, and as its COMPLAINT against Mark G. Lewis, M.D., Respondent, complains as follows:

COUNT I

1. Respondent is presently the holder of a Certificate of Registration as a Physician and Surgeon in the State of Illinois, License No. 036-074413, and Controlled Substance License No. 336-037910 issued by the Department of Financial and Professional Regulation of the State of Illinois. Said Licenses are presently in active status.
2. That the Department has jurisdiction to investigate complaints and to bring this action pursuant to 225 ILCS 60/36.
3. At all times herein mentioned, Respondent was practicing as a Physician and Surgeon in the Geneva area of the State of Illinois.
4. In 2012, J.K. was dating the son of Respondent's girlfriend and/or fiancée.

5. In 2012, J.K. would consult Respondent for diagnosis and/or treatment plan regarding her stomach complaints.
6. On or about November 16, 2012, J.K. went to Respondent's personal residence for a party.
7. On or about November 16, 2012, J.K. consumed two glasses of wine.
8. On or about November 17, 2012, Respondent gave J.K. a drink of Makers Mark whiskey and a separate glass of cola.
9. On or about November 17, 2012, shortly after Respondent gave J.K. drinks, J.K. blacked out at Respondent's residence.
10. On or about November 17, 2012, at or around 04:30 hours, J.K. woke up in the room of one of Respondent's girlfriend/fiancée's children wearing only a tank top and sweater and was naked from the waist down.
11. On or about November 17, 2012, J.K. found Respondent lying shirtless next to her.
12. On or about November 17, 2012, Respondent informed J.K. that her pants were in the wash because she peed in them.
13. On or about November 17, 2012, Respondent asked J.K. not to tell his girlfriend/fiancée about anything that happened.
14. On or about November 17, 2012, Respondent gave J.K. her pants and socks that appeared to be unwashed.
15. On or about November 17, 2012, Respondent was sniffing J.K.'s underwear as he was talking to her.

16. On or about November 17, 2012, J.K. went back to the room of one of Respondent's girlfriend/fiancée's children.
17. On or about November 17, 2012, Respondent offered J.K. a Xanax pill.
18. On or about November 17, 2012, J.K. fell back asleep in Respondent's house.
19. On or about November 17, 2012, at or around 09:00 hours, J.K. woke up and felt pain in her anal area.
20. On or about November 17, 2012, J.K. told Respondent's girlfriend/fiancée's daughter what happened with J.K. during the previous night.
21. On or about November 17, 2012, J.K. presented to Centegra Hospital-Woodstock Emergency Room complaining of:
 - a. Possible Sexual Assault;
 - b. Rectal Pain; and
 - c. Bleeding.
22. On or about November 17, 2012, a sexual assault evidence collection kit was collected from patient J.K., including a swab of her anal cavity while she was a patient at Centegra Hospital-Woodstock Emergency Room.
23. On or about October 23, 2013, Respondent presented to the St. Charles Police Department.
24. On or about October 23, 2013, Respondent submitted his DNA sample via Buccal Swab pursuant to a September 2013 Kane County Grand Jury Subpoena.
25. On or about March 12, 2014, Respondent was interviewed by the Department Investigator Joseph Jones along with the Illinois State Police Special Agent Hector Alejandro.

26. During said March 12, 2014, interview, Respondent denied having sex with J.K.
27. The Illinois State Police, Division of Forensic Services Laboratory Report dated June 9, 2014, revealed that the DNA profile identified in the anal swabs (semen identified) from J.K. collected with the rape kit matched the DNA profile of Respondent.
28. The foregoing acts and/or omissions are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes, Section 60/22 (A), paragraph (5) and (20).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF PROFESSIONAL REGULATION, of the State of Illinois, by Laura E. Forester, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License and Controlled Substance License of Mark G. Lewis, M.D., be suspended, revoked, or otherwise disciplined.

COUNT II

- 1-3. The Department hereby adopts and re-alleges paragraphs 1 through 3 of Count I of this Complaint as paragraphs 1 through 3 of Count II.
4. At all relevant times herein mentioned, Respondent was patient K.G.'s treating physician.
5. At all relevant times herein mentioned, Respondent knew that patient K.G. was diagnosed and/or was receiving treatment for depression and/or anxiety.
6. Starting on or about Easter 2012, while Respondent was a treating physician of patient K.G., Respondent began exchanging text messages with patient K.G.

7. On or about June 11, 2012, between 9 and 10 AM, Respondent exchanged a series of text messages with patient K.G. which contained sexually inappropriate and/or unprofessional messages, including but not limited to:
 - a. "Oh I forgot Your on the bad girl list If you miss your appointment you'll have to bribe me"
 - b. "Yes a cattle prod on full should be fool proof In fact that gives me some good ideas... Can you bring that to your appointment please I've got the vibrators here already"
 - c. "We'll see how bad you want this disability..."
 - d. "And if you miss that appointment then you'll really be in trouble..."
8. On or about June 11, 2012, at or around 7:27 pm, Respondent texted the following message to patient K.G.:
 - a. "I apologize if I offended you. I'm sorry It sounds like I upset you and your family Please forgive me My office will help you find another doctor to replace me"
9. On or about June 12, 2012, patient K.G. came to the Aurora Police Department to report harassment by text from Respondent.
10. The foregoing acts and/or omissions are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes, Section 60/22 (A), paragraph (5).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF PROFESSIONAL REGULATION, of the State of Illinois, by Laura E. Forester, its Chief

of Medical Prosecutions, prays that the Illinois Physician and Surgeon License and Controlled Substance License of Mark G. Lewis, M.D., be suspended, revoked, or otherwise disciplined.

COUNT III

- 1-3. The Department hereby adopts and re-alleges paragraphs 1 through 3 of Count I of this Complaint as paragraphs 1 through 3 of Count III.
4. At all times herein mentioned, Respondent was patient J.S.'s treating physician.
5. During 2008 and/or 2009, Respondent engaged in a sexual relationship with patient J.S. while continuing to be patient J.S.'s treating physician.
6. On or about April 28, 2014, patient J.S. was interviewed by Department Investigator Jones.
7. During the April 28, 2014 interview, patient J.S. provided the following information regarding Respondent:
 - a. Respondent has been her doctor for over 20 years;
 - b. Respondent has been seeing her on monthly to bimonthly basis;
 - c. Respondent treats her with pain medications;
 - d. She taught Respondent about horses and provided Respondent's children with horse riding lessons;
 - e. Respondent and patient J.S. engaged in sexual relationship 5 or 6 years ago;
 - f. Said sexual relationship lasted a couple of months and ended by mutual agreement;
 - g. Respondent and patient J.S. remain good friends;

h. Respondent continued to be patient J.S.'s treating physician after their sexual relationship ended.

8. The foregoing acts and/or omissions are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes, Section 60/22 (A), paragraph (5) and (20).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF PROFESSIONAL REGULATION, of the State of Illinois, by Laura E. Forester, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License and Controlled Substance License of Mark G. Lewis, M.D., be suspended, revoked, or otherwise disciplined.

COUNT IV

- 1-3. The Department hereby adopts and re-alleges paragraphs 1 through 3 of Count I of this Complaint as paragraphs 1 through 3 of Count IV.
4. Between December 2010 and May 2012, Respondent was a treating physician for patient A.M. a/k/a A.S.
5. While Respondent was patient A.M.'s treating physician, Respondent prescribed and/or authorized prescriptions for various Controlled Substances for patient A.M., including but not limited to the following:
- a. Vicodin;
 - b. Norco;
 - c. Valium;
 - d. Oxycontin;

- e. Percocet;
 - f. Opana ER;
 - g. Xanax;
 - h. Demerol IM.
6. Controlled Substances are associated with the development of physical dependence and severe withdrawal symptoms.
 7. Controlled Substances are associated with the development of substance abuse disorder and/or addiction.
 8. Patients, who are prescribed Controlled Substances, should be carefully monitored for development of the following:
 - a. Physical dependence;
 - b. Severe withdrawal symptoms;
 - c. Substance abuse disorder and/or addiction.
 9. While Respondent was prescribing and/or authorizing addictive and/or abused Controlled Substances for patient A.M., Respondent knew and/or should have known the following clinical data and/or information regarding patient A.M.:
 - a. March 12, 2011 Illinois Prescription Monitoring Program profile for patient A.M. revealed that patient A.M. was obtaining multiple Controlled Substances from multiple healthcare providers;
 - b. March 12, 2011 Illinois Prescription Monitoring Program profile for patient A.M. revealed that patient A.M. was filling prescriptions for Controlled Substances in multiple areas pharmacies;

- c. On or about March 15, 2011, Respondent received information that a pharmacist contacted Respondent's office indicating that said pharmacist thought that Respondent's prescription for Oxycontin for patient A.M. had been altered;
- d. May 5, 2011 Illinois Prescription Monitoring Program profile for patient A.M. revealed that patient A.M. was filling prescriptions for Controlled Substances in multiple areas pharmacies;
- e. May 5, 2011 Illinois Prescription Monitoring Program profile for patient A.M. revealed that patient A.M. was filling prescriptions for Controlled Substances and paying by cash even though patient A.M. had Medicaid;
- f. On or about June 6, 2011, Respondent reviewed ER notes from a May 30, 2011, ER visit that revealed that patient A.M. obtained additional Controlled Substances from said ER;
- g. In June 2011, patient A.M. requested and received multiple refills of Xanax authorized by Respondent;
- h. On or about July 19, 2011, patient A.M. signed a contract with Respondent indicating that she agreed to only see Respondent for continued care of Controlled Substance injections and refills of narcotics/ pain medications;
- i. On or about July 21, 2011, Respondent questioned patient A.M. about obtaining Controlled Substances from other healthcare providers while receiving Controlled Substances from him;

- j. On or about August 23, 2011, Respondent learned that patient A.M. presented to the Emergency Room at Delnor Hospital on August 21, 2011, and obtained Controlled Substances from the Emergency Room attending physician;
- k. On or about September 6 2011, Respondent learned that patient A.M. presented to Emergency Room at Delnor Hospital on August 29, 2011, and attempted to receive Controlled Substances while at the Emergency Room.
- l. On or about September 6, 2011, Respondent learned that patient A.M. was refused any Controlled Substances during the aforementioned August 29, 2011 ER visit;
- m. On or about September 22, 2011, Respondent learned that patient A.M. presented to the Emergency Room at Delnor Hospital on September 17, 2011, seeking Controlled Substances.
- n. On or about September 22, 2011, Respondent learned that the ER attending physician noted the following clinical data and/or information: (i) patient A.M. is likely pain medication seeking, (ii) possibly has a narcotic substance abuse problem; (iii) pharmacist also notes that she goes under a different name as well, (iv) the prescription for Norco was not filled.
- o. On or about November 22, 2011, Respondent had noted that his office staff has expressed concerns about patient A.M.'s using fraudulent prescriptions based on multiple phone calls from area pharmacies.

p. Between December 2011 and January 2012, patient A.M. presented to the Emergency Room at Delnor Hospital on numerous occasions seeking Controlled Substances there;

q. On or about January 30, 2012, Respondent noted that he began counseling patient A.M. about opiate dependency issues

10. While Respondent was patient A.M.'s treating physician, Respondent hired patient A.M. to work in his medical office on or about Spring 2011.
11. Respondent hired patient A.M. to work in his medical office as a receptionist even though Respondent began cutting office hours and closed his medical office on Wednesdays.
12. Respondent continued to employ patient A.M. at his medical office until September 2011 while Respondent continued to be patient A.M.'s treating physician.
13. Respondent continued to employ patient A.M. at his medical office between Spring 2011 and September 2011 while Respondent continued to prescribe multiple Schedule II, III and IV Controlled Substances to patient A.M.
14. Between 2010 and May 2012, Respondent would authorize prescriptions for various Controlled Substances for patient A.M. a/k/a A.S. under both names A.M. and A.S.
15. On or about August 2011, Respondent learned that patient A.M. attempted to pick up a prescription from an area pharmacy under the name of another individual that was refused by the pharmacist.

16. Respondent continued to prescribe and authorize Controlled Substances for patient A.M. subsequent to receiving information in August 2011 that patient A.M. was utilizing names of others to obtain Controlled Substances.
17. On or about September 19, 2011, Respondent learned that a pharmacy questioned Respondent's prescription issued in the name of J.C. for Norco in the amount of 30 tablets.
18. On or about September 19, 2011, Respondent learned that J.C. was not a patient of his practice.
19. On or about September 19, 2011, Respondent authorized a pharmacy to fill a prescription for Norco 30 tablets in the name of J.C.
20. On or about September 19, 2011, Respondent learned that patient A.M. picked up a prescription for Norco in the name of J.C. that was authorized by Respondent.
21. Respondent continued to prescribe and authorize Controlled Substances for patient A.M. subsequent to receiving information in September 2011 regarding patient A.M. obtaining Controlled Substances by utilizing names of others.
22. On or about February 4, 2012, Respondent was contacted by a local pharmacist regarding a suspicious prescription for patient A.M. that Respondent authorized on February 3, 2012.
23. On or about February 4, 2012, Respondent informed a pharmacy employee that the February 3, 2012, prescription that patient A.M. was attempting to fill was forged.

24. On or about February 4, 2012, Respondent informed a pharmacy employee that he would like the pharmacy to call the police regarding the February 3, 2012, forged prescription.
25. Subsequent to the February 4, 2012, notification that patient A.M. forged Respondent's February 3, 2012, prescription, Respondent continued to prescribe Controlled Substances for patient A.M.
26. On or about March 12, 2014, Respondent was interviewed by Department Investigator Jones along with the Illinois State Police Special Agent Alejandro.
27. During said March 12, 2014 interview, Respondent provided the following information regarding patient A.M.:
 - a. She was hired to work in his office, but he was not sure what last name she was using;
 - b. Respondent became romantically involved with patient A.M. but added that he was not patient A.M.'s doctor when they were romantically involved;
 - c. Respondent did not remember the month or the year he was romantically involved with patient A.M.;
 - d. Respondent took patient A.M. on vacation when he was no longer her doctor;
 - e. Respondent acknowledged that he was contacted on February 4, 2012, about patient A.M. attempting to fill a forged prescription.

28. While Respondent was patient A.M.'s treating physician, Respondent authorized multiple Controlled Substances for patient A.M. despite his knowledge of patient A.M. exhibiting signs of drug seeking behavior.
29. While Respondent was patient A.M.'s treating physician, Respondent authorized multiple Controlled Substances for patient A.M. despite his knowledge of patient A.M. exhibiting signs of drug dependence and/or abuse.
30. Respondent committed acts and/or omissions which constitute violations of the Medical Practice Act including but not limited to:
 - a. Breaching his physician responsibility to patient A.M. according to accepted medical standards of practice;
 - b. Causing actual harm to patient A.M.
31. The foregoing acts and/or omissions are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes, Section 60/22 (A) paragraph (5), relying upon the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code, Title 68, Chapter VII, Subpart b, Part 1285.240 (a), Section 60/22(A), paragraphs (17), (20) and (33), and 720 Illinois Compiled Statutes, Section 570/304(a)(5) and Section 570/312(h).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF PROFESSIONAL REGULATION, of the State of Illinois, by Laura E. Forester, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License and Controlled Substance License of Mark G. Lewis, M.D., be suspended, revoked, or otherwise disciplined.

COUNT V

- 1-3. The Department hereby adopts and re-alleges paragraphs 1 through 3 of Count I of this Complaint as paragraphs 1 through 3 of Count V.
6. In September 2011, J.C was not Respondent's patient.
7. In September 2011, Respondent did not establish physician-patient relationship with J.C.
8. In September 2011, Respondent did not conduct an appropriate examination and/or evaluation of J.C. prior to issuing a prescription to J.C for Norco in the amount of 30 tablets.
9. On or about March 12, 2014, Respondent was interviewed by the Department's Investigator Jones along with ISP Special Agent Alejandre.
10. During said March 12, 2014 interview, Respondent admitted that the prescription issued to J.C. on September 12, 2011 contained his signature.
11. During said March 12, 2014 interview, Respondent could not explain why he wrote a prescription for J.C. who was not his patient.
12. The foregoing acts and/or omissions are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes, Section 60/22 (A), paragraph (5), (17), and (33).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF PROFESSIONAL REGULATION, of the State of Illinois, by Laura E. Forester, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License and

Controlled Substance License of Mark G. Lewis, M.D., be suspended, revoked, or otherwise disciplined.

**DEPARTMENT OF FINANCIAL AND
PROFESSIONAL REGULATION, DIVISION OF
PROFESSIONAL REGULATION, of the State of
Illinois**

By: 

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Chief of Medical Prosecutions

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