

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

DEPARTMENT OF FINANCIAL AND	)	
PROFESSIONAL REGULATION of the State of Illinois	)	
DIVISION OF PROFESSIONAL REGULATION,	)	
Complainant,	)	2013-01173
v.	)	
Josip Pasic, M.D.,	)	
License No. 036-050621/33 [REDACTED] 18.	)	
Respondent.	)	

**CONSENT ORDER**

The Department of Financial and Professional Regulation of the State of Illinois, Division of Professional Regulation (Department), by and through Vladimir Lozovski, its attorney, and Josip Pasic, M.D., (Respondent), by and through his attorneys, Lillian Walanka, Drew Balac and Michael Monico, hereby agree to the following:

**STIPULATIONS**

Respondent holds a Certificate of Registration as a Physician and Surgeon in the State of Illinois, License No. 036-050621, and Illinois Controlled Substance License No. 33 [REDACTED] 18. Said licenses are currently in Temporarily Suspended Status. At all times material to the matter set forth in this Consent Order, the Department had jurisdiction over the subject matter and parties herein.

On December 14, 2016, Respondent's Illinois Physician and Surgeon License and Illinois Controlled Substance License were temporarily suspended based on the Department's Petition for Temporary Suspension. See Department Group Exhibit 1 (December 14, 2016 Director Order, Petition and Complaint), attached hereto and made a part of this Consent Order. Said Temporary Suspension remained in effect since that date. The allegation(s) as set forth herein, if proven to be true, would constitute grounds for suspending, revoking or other

discipline of Respondent's license as a Physician and Surgeon, on the authority 225 Illinois Compiled Statutes, Paragraph 60/22(A)(5), (9) and (20).

In September 2018, the Department filed its second amended complaint and while this matter was pending for the Formal Hearing on January 23-25 and 29-30, 2019, the Department and Respondent, through his attorneys, engaged in negotiations to amicably resolve this matter. Respondent neither admits nor denies the allegations set forth in the Second Amended Complaint but acknowledges that should this matter proceed to a contested hearing, the Illinois Medical Disciplinary Board (the "Board") may find violations of the Illinois Medical Practice Act. In the event that this Consent Order is not approved by the Board or is not approved by the Director of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation ("Director"), this acknowledgement shall not be admissible in any proceeding and the matter will be set for an evidentiary hearing on the merits as if this Consent Order had not been submitted.

Respondent has been advised of the right to a hearing on the pending Formal Complaint and the right to administrative review of this Consent Order. Respondent knowingly waives each of these rights, as well as the right to administrative review of the Director's December 14, 2016 Order. Such waiver ceases if this Consent Order is rejected by either the Medical Disciplinary Board or the Director of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation.

Respondent has freely and willfully entered into this Consent Order without any threat or coercion by any person. Respondent acknowledges that he has not relied upon any statement or promise made on behalf of the Department except as set forth herein.


Respondent and the Department have agreed, in order to resolve this matter, that Respondent, Josip Pasic, M.D., be permitted to enter into a Consent Order with the Department, providing for the imposition of disciplinary measures which are fair and equitable under the circumstances and which are consistent with the best interests of the people of the State of Illinois

### **CONDITIONS**


WHEREFORE, the Department, by and through Vladimir Lozovski, Staff Attorney, and Josip Pasic, M.D., Respondent, by and through his attorneys, Lillian Walanka, Drew Balac and Michael Monico, hereby agree to the following:

- A. Respondent's Illinois Physician and Surgeon License, No. 036-050621 and Respondent's Illinois Controlled Substance License No. 33[REDACTED]18 shall be INDEFINITELY SUSPENDED for a minimum of two (2) years retroactive to the December 14, 2016 (the date of temporary suspension).
- B. This Consent Order shall become effective immediately after it is approved by the Director of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation.
- C. This disposition is considered a discipline for reporting purposes to entities such as the National Practitioner Data Bank.


1/24/19  
DATE

  
Vladimir Lozovskiy  
Attorney for the Department


1/23/19  
DATE

  
Josip Pasic, M.D.  
Respondent

1/23/19  
DATE

  
Lillian Walanka  
Attorney for Respondent

1/23/19  
DATE

  
Drew Balac  
Attorney for Respondent

1/23/19  
DATE

  
Michael Monico  
Attorney for Respondent

2/6/19  
DATE


  
Member  
Medical Disciplinary Board

The foregoing Consent Order is approved in full.

DATED THIS 23 day of February, 2019.

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

  
\_\_\_\_\_  
Jessica Baer  
DIRECTOR

REF: Case No. 2013-01173  
Lic. No. 036-050621/33  18

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

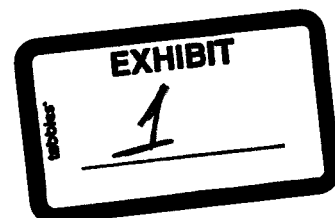
Department of Financial and Professional Regulation of the State of Illinois,	Complainant,	)
v.		)
Josip Pasic, M.D.,		) No. 2013-01173
License No. 036.050621/33 [REDACTED] 18,	Respondent.	)

**ORDER**

This matter having come before the Director of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation on a Petition filed by the Chief of Medical Prosecutions of the Division which requested Temporary Suspension of the Illinois Physician and Surgeon License and Controlled Substance License of Respondent, Josip Pasic, 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 Josip Pasic, M.D., Respondent, in that Respondent's actions constitute an immediate danger to the public:

NOW, THEREFORE, I, JESSICA BAER, ACTING DIRECTOR OF THE DIVISION OF PROFESSIONAL REGULATION of the State of Illinois, hereby ORDER that the Illinois Physician and Surgeon License No. 036.050621 and Controlled Substance License No. 33 [REDACTED] 18 of Josip Pasic, M.D., Respondent, 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(s) to the Department.



DATED THIS 14 DAY OF November, 2016.

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

  
\_\_\_\_\_  
**JESSICA BAER**  
Acting Director

Ref: IDFPR Case No. 2013-01173  
License Nos. 036.050621/33  18

**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.	)	No. 2013-01173
Josip Pasic, M.D.	)	
License Nos. 036.050621/33 [REDACTED] 18,	)	
Respondent	)	

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**PETITION FOR TEMPORARY SUSPENSION**

NOW COMES the Complainant, by its Chief of Medical Prosecutions, Laura E. Forester, and Petitions Jessica Baer, Acting 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 Illinois Physician and Surgeon License and Illinois Controlled Substance License of Josip Pasic, 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. 036.050621, and Illinois Controlled Substance License No. 33 [REDACTED] 18 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 a pattern of sexually inappropriate conduct and multiple physician-patient boundary violations with numerous psychiatric patients.
3. The Department has received information from the U.S. Department of Justice, Drug Enforcement Administration (DEA), Chicago Field Office, indicating that



since 2016, Respondent has been under investigation for inappropriate prescribing of Controlled Substances and sexually inappropriate conduct.

4. In December 2016, DEA Diversion Investigator (DI) Angelia Young along with the Illinois State Police Sergeant Hector Alejandro and the Illinois State Police Special Agent Daniel Ortiz interviewed patient R.S. who provided the following information regarding Respondent's conduct:
  - a. Respondent sees patient R.S. monthly at an office located at 2222 W. Division Street, Chicago, Illinois;
  - b. Respondent is treating patient R.S. for multiple psychiatric problems;
  - c. Respondent has prescribed patient R.S. Xanax, Paxil, Latuda, Hydrocodone and Hydromorphone;
  - d. Patient R.S. admitted that he is a recovering drug addict;
  - e. When asked why Respondent prescribes narcotics, patient R.S. indicated that he was stabbed 5-6 years ago in Puerto Rico and Respondent gives him narcotics for pain;
  - f. Respondent provides paper prescriptions to patient R.S.;
  - g. During appointments, Respondent asks if he can do a physical examination, closes and locks the door, and touches patient R.S. in the abdominal and groin area;
  - h. Respondent has made comments to patient R.S. regarding how strong patient R.S. is and how big his "private part" feels;
  - i. During one appointment, Respondent began touching patient R.S. and asked the patient if he wanted Respondent's watch;

- j. During another appointment, Respondent tried to pull patient R.S.'s pants down, but when Respondent saw patient R.S. starting to panic, Respondent stopped;
  - k. During another appointment, Respondent invited patient R.S. to go outside to show patient R.S. his new car;
  - l. Respondent has been touching patient R.S. inappropriately for the past two (2) years, but patient R.S. needs his medications and it can be difficult to find doctors who will accept Medicaid, so he continues to see Respondent;
  - m. Patient R.S. indicated that he is embarrassed, he has a pregnant girlfriend and he does not want anyone to know what has happened.
5. On November 30, 2016, Respondent was interviewed by DEA Diversion Investigators Young and Kasza during the inspection of registered premises, at his registered address [REDACTED]
6. During the November 30, 2016, interview, the following information was ascertained by DEA personnel:
- a. Respondent initially denied writing prescriptions for narcotic drugs or painkillers and writing prescriptions for family members or friends;
  - b. When informed by DEA DI Young that the Illinois Prescription Monitoring Program profile indicated that Respondent issued prescriptions for Hydrocodone, Hydromorphone and Tramadol, Respondent initially denied issuing prescriptions for Hydrocodone;

- c. When asked if Respondent knew someone named R.S., Respondent indicated that R.S. was a female who is a manager of a nursing home named Beacon Place on the far South Side of Chicago;
- d. Respondent stated that he has known R.S. for over 20 years;
- e. Respondent indicated that he issued a prescription for Hydrocodone as a favor because R.S. had a bad infection;
- f. Respondent denied issuing any other Controlled Substance prescriptions for R.S. other than Hydrocodone;
- g. When asked why Respondent prescribed Tramadol, Respondent indicated that he only issues Tramadol to "help patient out" until they can get an appointment to see their regular medical doctor;
- h. When asked if Respondent does any medical testing or performs a medical exam to ensure that patients need Tramadol, Respondent indicated no;
- i. When asked again if Respondent has issued Controlled Substance prescriptions for friends or family members, Respondent admitted prescribing Promethazine/Codeine to several friends, including E.S. who also receives Xanax from Respondent;
- j. Respondent denied ordering Geodon and using it to sedate African-American and Hispanic men and to have sex with these men and videotape the sexual encounters without their consent;
- k. Respondent denied that he has any pending complaints with the Department;

- l. When asked if a patient has ever alleged that Respondent was inappropriate, Respondent indicated no;
  - m. Subsequently, Respondent indicated that he did not want to discuss any issues without his attorney being present.
7. Subsequently, DEA DI Young contacted Beacon Place administration and learned that there was no employee with the initials R.S. at Beacon Place.
8. Since 2013, Respondent has been under investigation by the Department for allegations of sexually inappropriate behavior and numerous boundary violations with at least four patients at Circle Family HealthCare Network that led to the suspension of Respondent's services as provider of psychiatric care to patients of Circle Family HealthCare in March 2012.
9. Moreover, the Department's ongoing investigation revealed that Respondent failed to report the March 2012 suspension of his clinical services at Circle Family Healthcare on the 2014 Illinois Physician and Surgeon License Renewal application.
10. In addition, Respondent failed to disclose on his January 2013 credentialing application for hospital privileges at St. Mary and St. Elizabeth Medical Center, Chicago, Illinois, that he was subject of three separate investigations conducted by the Illinois Department of Human Services Office of Inspector General based on Respondent's conduct with patients at Circle Family HealthCare. See Exhibit A, Department's initial Formal Complaint No. 2013-0117, attached hereto and made part of this Petition.

11. Brian Zachariah, M.D., 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, Josip Pasic, M.D., presents an immediate danger to the safety of the public in the State of Illinois. See the Department's Exhibit B, 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 Illinois Physician and Surgeon License and Illinois Controlled Substance License of Josip Pasic, 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 Lozovski  
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



RULES OF PRACTICE IN ADMINISTRATIVE HEARINGS IN THE DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION AND BEFORE COMMITTEES OR BOARDS OF SAID DEPARTMENT AS WELL AS PRACTICE ACTS AND RULES MAY BE OBTAINED AT THE DEPARTMENT'S WEBSITE <http://www.idfpr.com/dpr/default.asp>

PLEASE BE ADVISED THAT YOU WILL HAVE TO SHOW A STATE ISSUED PHOTO IDENTIFICATION AND GO THROUGH A METAL DETECTOR IN ORDER TO GAIN ACCESS TO THE BUILDING.

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

  
Vladimir Lozovskiy  
Attorney for the Department

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

**PROOF OF SERVICE**

STATE OF ILLINOIS                    )  
  )     SS: No. 2013-1173  
COUNTY OF COOK                    )

UNDER PENALTY of perjury, as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that I caused the attached Department's Complaint to be emailed to Respondent's attorney on December 10, 2015

  
\_\_\_\_\_  
Affiant

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CLERK OF COURT

No. 2013-01173

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6. At all times relevant to this Complaint, Respondent was treating patient R.C. for Bipolar Disorder.
7. At or around Spring 2006, Respondent began providing therapy for patient R.C.
8. While Respondent was providing therapy for patient R.C., Respondent engaged in the following interactions with patient R.C.:
  - a. Respondent was attracted to patient R.C.;
  - b. Respondent was aroused by patient R.C.;
  - c. Respondent disclosed his sexual orientation to patient R.C.;
  - d. Respondent asked patient R.C. to meet him outside of the clinic;
  - e. Respondent provided patient R.C. with some money.
9. On or about September 2006, patient R.C. made a complaint regarding Respondent's conduct during his therapy sessions with Respondent.
10. On or about October 2006, Respondent was interviewed by the Illinois Department of Human Services OIG Investigator regarding Respondent's conduct with patient R.C.
11. During said October 2006 interview, Respondent provided the following information regarding patient R.C.:
  - a. Denied making any sexual advances towards patient R.C.;
  - b. Denied disclosing his sexual orientation to patient R.C.;
  - c. Denied giving patient R.C. money and hand-written note;
  - d. Admitted that during August 2006 therapy session, patient R.C.'s therapist sat in on the session at patient R.C.'s request;
  - e. Respondent did not know what patient R.C. wanted his therapist to sit at the therapy session with Respondent;

- f. Respondent recalled one incident when patient R.C. showed up at his home uninvited;
- g. Respondent indicated that patient R.C. must have stolen one of Respondent's business cards with Respondent's home address;
- h. Respondent indicated that patient R.C. stopped by Respondent's home because he needed money to get back home;
- i. Respondent gave patient R.C. five dollars for a bus;
- j. Respondent never reported this incident to the agency because he was afraid of patient R.C.;
- k. Respondent could not recall when patient R.C. stopped by him home.

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)(5) and (20), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240, 20 ILCS 2105/2105-130, and 20 ILCS 2105/2105-135.

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 Physician and Surgeon License of Josip Pasic, M.D., be suspended, revoked, or otherwise disciplined.

#### COUNT II

1-4. The Department realleges paragraphs 1 through 4 of Count I as paragraphs 1 through 4 of Count II.

5. At all times mentioned in this Complaint, Respondent was responsible for care, treatment and evaluation of patient O.C.
6. Respondent provided care and treatment for patient O.C.'s Bipolar Disorder.
7. While Respondent was providing care and treatment for patient O.C., Respondent engaged in the following interactions with patient O.C.:
  - a. Respondent commented on patient O.C.'s flat stomach;
  - b. Respondent allowed patient O.C. to wear Respondent's watch during a therapy session;
  - c. Respondent moaned as he had his hand on his own genitals in front of patient O.C.;
  - d. Respondent stroked patient O.C.'s hand;
  - e. Respondent asked patient O.C.'s about patient's sex life with a girlfriend.
8. On or about August 2008, Respondent's conduct with patient O.C. was reported to the Illinois Department of Human Services, Office of Inspector General.
9. On or about August 14, 2008, Respondent was interviewed by the Illinois Department of Human Services OIG Investigator regarding Respondent's conduct with patient O.C.
10. During said interview, Respondent admitted that:
  - a. Respondent allowed patient O.C. to try Respondent's watch during therapy session;
  - b. Respondent had to assist patient O.C. to put Respondent's watch on.
11. Subsequently to 2008 OIG Investigation, Respondent was informed of the following:
  - a. Respondent is not to share his jewelry or clothing with patients;
  - b. During patient-physician therapy sessions and/or office appointments, the door is to be left open, except for patients receiving injections.

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)(5) and (20), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240, 20 ILCS 2105/2105-130, and 20 ILCS 2105/2105-135.

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 Physician and Surgeon License of Josip Pasic, M.D., be suspended, revoked, or otherwise disciplined.

### COUNT III

1-4. The Department realleges paragraphs 1 through 4 of Count I as paragraphs 1 through 4 of Count III.

5. At all times mentioned in this Complaint, Respondent was responsible for care, treatment and evaluation of patient E.S.

6. Respondent provided care and treatment for patient E.S.'s Bipolar Disorder.

7. While Respondent was providing care and treatment for patient E.S., Respondent engaged in the following interactions with patient E.S.:

a. Respondent touched patient E.S.'s penis during March 2012 office visit;

b. When patient E.S. threatened to report Respondent's conduct, Respondent gave patient E.S. \$80.00.

8. Subsequently, patient E.S. reported Respondent's conduct to Circle Family Care and Chicago Police Department.

9. On or about 2012, Respondent was interviewed by the Illinois Department of Human Services  
OIG Investigator regarding Respondent's conduct with patient E.S.

10. During said interview, Respondent provided the following information regarding his  
interactions with patient E.S. on March 26, 2012:

- a. During office visit, patient E.S. was groping his own penis and became aroused;
- b. Then, patient E.S. offered to show his erected penis to Respondent;
- c. Respondent became fearful for his life;
- d. Patient E.S. asked Respondent for money;
- e. Respondent gave patient E.S. \$40.00;
- f. Respondent did not report the incident to anyone;
- g. Respondent did not report to Circle Family Care that he gave patient E.S. money;
- h. Respondent did not report to Circle Family Care that he was fearful of patient E.S.

11. On or about March 2012, Respondent's care services with Circle Family Care was indefinitely  
suspended pending the outcome of the Illinois Department of Human Services OIG investigation  
of Respondent's conduct with patient E.S.

12. Since March 2012, Respondent has not been able to provide care and treatment to patients at  
Circle Family Care.

13. On or about July 12, 2014, Respondent submitted an electronic application for renewal of his  
Illinois Physician and Surgeon License No. 036-050621.

14. Respondent was required to respond to the following question in order to renew his Illinois  
Physician and Surgeon License in 2014:

**"Since July 31, 2011, have your clinical, hospital or practice privileges relating to  
patient care been involuntarily restricted, suspended or revoked other than for  
noncompletion of medical records?"**

15. On or about July 2014, Respondent failed to inform the Department regarding suspension of his clinical services at Circle Family Care in March 2012.

16. On or about July 2014, Respondent affirmed and declared that the information provided in his 2014 Illinois Physician and Surgeon License renewal Application was true, correct and complete.

17. 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)(9) and (5) and (20), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240, 20 ILCS 2105/2105-130, and 20 ILCS 2105/2105-135.

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 Physician and Surgeon License of Josip Pasic, M.D., be suspended, revoked, or otherwise disciplined.

#### COUNT IV

1-12. The Department realleges paragraphs 1 through 12 of Count I as paragraphs 1 through 12 of Count IV.

13. On or about January 24, 2013, Respondent submitted a credential application for hospital privileges and/or admitting privileges at St. Mary and St. Elizabeth Medical Center, Chicago, Illinois.

14. On or about January 24, 2013, Respondent affirmed that all the information provided and the responses given in his credentialing application are correct and complete to the best of Respondent's knowledge and belief.

15. As a part of his credentialing application, Respondent was required to answer the following question:

**“Have you been the subject of a civil or criminal complaint or administrative action or been notified in writing that you are being investigated as the possible subject at a civil, criminal or administrative action regarding sexual misconduct, child abuse, domestic violence or elder abuse?”**

16. Respondent failed to provide information regarding three separate investigations conducted by the Illinois Department of Human Services Office of Inspector General based on Respondent’s conduct with patients R.C., O.C. and E.S.

17. 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)(31).

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 Physician and Surgeon License of Josip Pasic, M.D., be suspended, revoked, or otherwise disciplined.

#### COUNT V

1-4.The Department realleges paragraphs 1 through 4 of Count I as paragraphs 1 through 4 of Count V.

5. At all times mentioned in this Complaint, Respondent was responsible for care, treatment and evaluation of patient A.P.

6. Respondent provided care and treatment for patient A.P.’s Bipolar Disorder.

7. While Respondent was providing care and treatment for patient A.P., Respondent engaged in the following interactions with patient A.P.:

a. Respondent asked patient A.P. is the patient got “hard”;

- b. Respondent would ask patient A.P. if the patient hurt the girls with his big dick;
  - c. Respondent would touch patient A.P.'s hands, arms and/or back;
  - d. Respondent invited patient A.P. to come and wash Respondent's car.
8. On or about February 2014 , Respondent's conduct with patient A.P. was reported to the Illinois Department of Human Services, Office of Inspector General.
9. On or about 2014, Respondent was interviewed by the Illinois Department of Human Services OIG Investigator regarding Respondent's conduct with patient A.P.
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)(5) and (20), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240, 20 ILCS 2105/2105-130, and 20 ILCS 2105/2105-135.

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 Physician and Surgeon License of Josip Pasic, M.D., be suspended, revoked, or otherwise disciplined.

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

By: \_\_\_\_\_

**LAURA E. FORESTER**  
Chief of Medical Prosecutions



Vladimir Lozovskiy  
Staff Attorney, Medical Prosecutions Unit  
Department of Financial and Professional Regulation  
Division of Professional Regulation  
100 W. Randolph, Suite 9-300  
Chicago, IL 60601  
312/814-1691

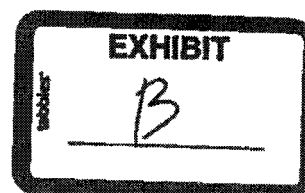
**STATE OF ILLINOIS  
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION  
DIVISION OF PROFESSIONAL REGULATION**

DEPARTMENT OF FINANCIAL AND	)	
PROFESSIONAL REGULATION	)	
of the State of Illinois,	)	
v.	)	No. 2013-01173
Josip Pasic, M.D.	)	
License No. 036-050621,	)	
Complainant,	)	
Respondent.	)	

**AFFIDAVIT OF BRIAN ZACHARIAH, M.D.**

I, Brian Zachariah, 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 thirty years.
2. I am currently Chief Medical Coordinator of the Illinois Department of Financial and Professional Regulation, Division of Professional Regulation (Department).
3. I have reviewed various documents in the Department's possession regarding Josip Pasic, M.D., who is a holder of Illinois Physician and Surgeon License No. 036-050621, including Department's investigative reports, materials regarding multiple investigations conducted by Illinois Department of Human Services Office of Inspector General based on the allegations of sexually inappropriate conduct and boundary violations committed by Respondent against multiple psychiatric patients receiving outpatient mental health services at Circle Family Healthcare Network.



4. I reviewed a pending Formal Complaint against Respondent that is based on Respondent's sexually inappropriate behavior and numerous boundary violations with at least four patients at Circle Family HealthCare Network that led to suspension of Respondent's services as provider of psychiatric care to patients of Circle Family HealthCare in March 2012.
5. I also learned that the Department's ongoing case revealed that Respondent failed to report the March 2012 suspension of his clinical services at Circle Family Healthcare on the 2014 Illinois Physician and Surgeon License Renewal application. In addition, Respondent failed to disclose on his January 2013 credentialing application for hospital privileges at St. Mary and St. Elizabeth Medical Center, Chicago, Illinois that he was subject of three separate investigations conducted by the Illinois Department of Human Services Office of Inspector General based on Respondent's conduct with patients at Circle Family HealthCare .
6. I also reviewed DEA Reports regarding on-going investigation of Respondent's prescribing of pain medications to patients of his psychiatric practice as well continued boundary violations with patient R.S., including but not limited to:
  - (i) During appointments, Respondent asks if he can do physical examination, closes and locks the door, and touches patient R.S.'s abdominal and groin area;
  - (ii) Respondent made comments to patient R.S. about how strong patient R.S. is and how big his "private part" feels;
  - (iii) During one appointment, Respondent began touching patient R.S. and asked the patient if he wanted Respondent's watch;
  - (iv) During another appointment, Respondent tried to pull patient R.S.'s pants down, but when Respondent saw patient R.S. was panicking,

Respondent stopped;

(v) During another appointment, Respondent invited patient R.S. to go outside to show patient R.S. his new car.

7. I also reviewed DEA Report regarding November 30, 2016 Respondent's interview Conducted by DEA Diversion Investigators during DEA Inspections of Respondent's registered location which revealed that Respondent initially denied prescribing pain medications in his practice until confronted by the DEA Diversion Investigators, initially denied treating friends and family until confronted by DEA Diversion Investigators, identified R.S. as a female who Respondent knew for 20 years and who is a manager of a nursing home named Beacon Place, and denied that there was pending Complaint against Respondent based on the inappropriate conduct with patients until confronted by the DEA Diversion Investigators.
8. Based on the foregoing, I am of the opinion to a reasonable degree of medical certainty that the continued practice of medicine by Josip Pasic, M.D., presents an immediate danger to the safety of the public in the State of Illinois.

[REDACTED]  
Brian Zachariah, M.D.  
Affiant

Subscribed and sworn to before me  
this 14th day of December 2016.

[REDACTED]  
NOTARY PUBLIC

OFFICIAL SEAL  
KATHLEEN M WALSH  
NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXPIRES 03/03/17

**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.	)	
Josip Pasic, M.D.	)	No. 2013-01173
License No. 036-050621,	)	
	)	Respondent.

16 DEC 14 AM 10:45

**AMENDED 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 AMENDED COMPLAINT against Josip Pasic, M.D., Respondent, complains as follows:

**COUNT I**

1. Respondent is presently the holder of a Certificate of Registration as a Licensed Physician and Surgeon in the State of Illinois, License No. 036-050621, issued by the Department of Financial and Professional Regulation of the State of Illinois. Said license is presently in ACTIVE status.
2. The Department has jurisdiction to investigate complaints and to bring this action pursuant to 20 ILCS 2105-2105-15(a)(5) and 225 ILCS 60.36.
3. At all times relevant to this Complaint, Respondent was a licensed Physician and Surgeon in the State of Illinois.
4. At all times relevant to this Complaint, Respondent was practicing as a psychiatrist at Circle Family Care, Chicago, Illinois.
5. At all times relevant to this Complaint, Respondent was providing care and treatment to patient R.C. at Circle Family Care

6. At all times relevant to this Complaint, Respondent was treating patient R.C. for Bipolar Disorder.
7. At or around Spring 2006, Respondent began providing therapy for patient R.C.
8. While Respondent was providing therapy for patient R.C., Respondent engaged in the following interactions with patient R.C.:
  - a. Respondent was attracted to patient R.C.;
  - b. Respondent was aroused by patient R.C.;
  - c. Respondent disclosed his sexual orientation to patient R.C.;
  - d. Respondent asked patient R.C. to meet him outside of the clinic;
  - e. Respondent provided patient R.C. with some money.
9. On or about September 2006, patient R.C. made a complaint regarding Respondent's conduct during his therapy sessions with Respondent.
10. On or about October 2006, Respondent was interviewed by the Illinois Department of Human Services OIG Investigator regarding Respondent's conduct with patient R.C.
11. During said October 2006 interview, Respondent provided the following information regarding patient R.C.:
  - a. Denied making any sexual advances towards patient R.C.;
  - b. Denied disclosing his sexual orientation to patient R.C.;
  - c. Denied giving patient R.C. money and hand-written note;
  - d. Admitted that during August 2006 therapy session, patient R.C.'s therapist sat in on the session at patient R.C.'s request;
  - e. Respondent did not know what patient R.C. wanted his therapist to sit at the therapy session with Respondent;

f. Respondent recalled one incident when patient R.C. showed up at his home uninvited;

g. Respondent indicated that patient R.C. must have stolen one of Respondent's business cards with Respondent's home address;

h. Respondent indicated that patient R.C. stopped by Respondent's home because he needed money to get back home;

i. Respondent gave patient R.C. five dollars for a bus;

j. Respondent never reported this incident to the agency because he was afraid of patient R.C.;

k. Respondent could not recall when patient R.C. stopped by him home.

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)(5) and (20), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240, 20 ILCS 2105/2105-130, and 20 ILCS 2105/2105-135.

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 Physician and Surgeon License of Josip Pasic, M.D., be suspended, revoked, or otherwise disciplined.

#### COUNT II

1-4. The Department realleges paragraphs 1 through 4 of Count I as paragraphs 1 through 4 of Count II.

5. At all times mentioned in this Complaint, Respondent was responsible for care, treatment and evaluation of patient O.C.
6. Respondent provided care and treatment for patient O.C.'s Bipolar Disorder.
7. On or about July 30, 2008, Respondent was providing therapy and/or private counseling session to patient O.C. as a part of patient O.C.'s out-patient psychiatric services a Circle Family Care.
8. While Respondent was providing care and treatment for patient O.C. in July 2008, Respondent engaged in the following interactions with patient O.C.:
  - a. Respondent commented on patient O.C.'s flat stomach;
  - b. Respondent allowed patient O.C. to wear Respondent's watch during a therapy session;
  - c. Respondent moaned as he had his hand on his own genitals in front of patient O.C.;
  - d. Respondent stroked patient O.C.'s hand;
  - e. Respondent asked patient O.C.'s about patient's sex life with a girlfriend.
9. On or about August 2008, Respondent's conduct with patient O.C. was reported to the Illinois Department of Human Services, Office of Inspector General.
10. On or about August 14, 2008, Respondent was interviewed by the Illinois Department of Human Services OIG Investigator regarding Respondent's conduct with patient O.C.
11. During said interview, Respondent admitted that:
  - a. Respondent allowed patient O.C. to try Respondent's watch during therapy session;
  - b. Respondent had to assist patient O.C. to put Respondent's watch on.
12. Subsequently to 2008 OIG Investigation, Respondent was informed of the following:
  - a. Respondent is not to share his jewelry or clothing with patients;
  - b. During patient-physician therapy sessions and/or office appointments, the door is to be left open, except for patients receiving injections.



13. 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)(5) and (20), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240, 20 ILCS 2105/2105-130, and 20 ILCS 2105/2105-135.

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 Physician and Surgeon License of Josip Pasic, M.D., be suspended, revoked, or otherwise disciplined.

### COUNT III

1-4. The Department realleges paragraphs 1 through 4 of Count I as paragraphs 1 through 4 of Count III.

5. At all times mentioned in this Complaint, Respondent was responsible for care, treatment and evaluation of patient E.S.

6. Respondent provided care and treatment for patient E.S.'s Bipolar Disorder.

7. While Respondent was providing care and treatment for patient E.S., Respondent engaged in the following interactions with patient E.S.:

a. Respondent touched patient E.S.'s penis during March 2012 office visit;

b. When patient E.S. threatened to report Respondent's conduct, Respondent gave patient E.S. \$80.00.

8. Subsequently, patient E.S. reported Respondent's conduct to Circle Family Care and Chicago Police Department.

9. On or about 2012, Respondent was interviewed by the Illinois Department of Human Services  
OIG Investigator regarding Respondent's conduct with patient E.S.

10. During said interview, Respondent provided the following information regarding his  
interactions with patient E.S. on March 26, 2012:

- a. During office visit, patient E.S. was groping his own penis and became aroused;
- b. Then, patient E.S. offered to show his erected penis to Respondent;
- c. Respondent became fearful for his life;
- d. Patient E.S. asked Respondent for money;
- e. Respondent gave patient E.S. \$40.00;
- f. Respondent did not report the incident to anyone;
- g. Respondent did not report to Circle Family Care that he gave patient E.S. money;
- h. Respondent did not report to Circle Family Care that he was fearful of patient E.S.

11. On or about March 2012, Respondent's care services with Circle Family Care was indefinitely  
suspended pending the outcome of the Illinois Department of Human Services OIG investigation  
of Respondent's conduct with patient E.S.

12. Since March 2012, Respondent has not been able to provide care and treatment to patients at  
Circle Family Care.

13. On or about July 12, 2014, Respondent submitted an electronic application for renewal of his  
Illinois Physician and Surgeon License No. 036-050621.

14. Respondent was required to respond to the following question in order to renew his Illinois  
Physician and Surgeon License in 2014:

**"Since July 31, 2011, have your clinical, hospital or practice privileges relating to  
patient care been involuntarily restricted, suspended or revoked other than for  
noncompletion of medical records?"**

15. On or about July 2014, Respondent failed to inform the Department regarding suspension of his clinical services at Circle Family Care in March 2012.

16. On or about July 2014, Respondent affirmed and declared that the information provided in his 2014 Illinois Physician and Surgeon License renewal Application was true, correct and complete.

17. 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)(9) and (5) and (20), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240, 20 ILCS 2105/2105-130, and 20 ILCS 2105/2105-135.

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 Physician and Surgeon License of Josip Pasic, M.D., be suspended, revoked, or otherwise disciplined.

#### **COUNT IV**

1-12.The Department realleges paragraphs 1 through 12 of Count I as paragraphs 1 through 12 of Count IV.

13. On or about January 24, 2013, Respondent submitted a credential application for hospital privileges and/or admitting privileges at St. Mary and St. Elizabeth Medical Center, Chicago, Illinois.

14. On or about January 24, 2013, Respondent affirmed that all the information provided and the responses given in his credentialing application are correct and complete to the best of Respondent's knowledge and belief.

15. As a part of his credentialing application, Respondent was required to answer the following question:

**“Have you been the subject of a civil or criminal complaint or administrative action or been notified in writing that you are being investigated as the possible subject at a civil, criminal or administrative action regarding sexual misconduct, child abuse, domestic violence or elder abuse?”**

16. Respondent failed to provide information regarding three separate investigations conducted by the Illinois Department of Human Services Office of Inspector General based on Respondent’s conduct with patients R.C., O.C. and E.S.

17. 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)(31).

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 Physician and Surgeon License of Josip Pasic, M.D., be suspended, revoked, or otherwise disciplined.

#### COUNT V

1-4.The Department realleges paragraphs 1 through 4 of Count I as paragraphs 1 through 4 of Count V.

5. At all times mentioned in this Complaint, Respondent was responsible for care, treatment and evaluation of patient A.P.

6. Respondent provided care and treatment for patient A.P.’s Bipolar Disorder at Circle Family Care in between 2008- March 2012.

7. While Respondent was providing care and treatment for patient A.P., Respondent engaged in the following interactions with patient A.P.:

- a. Respondent asked patient A.P. if the patient got “hard”;
- b. Respondent would ask patient A.P. if the patient hurt the girls with his big dick;
- c. Respondent would touch patient A.P.’s hands, arms and/or back;
- d. Respondent invited patient A.P. to come and wash Respondent’s car.

8. On or about February 2014, Respondent’s conduct with patient A.P. was reported to the Illinois Department of Human Services, Office of Inspector General.

9. On or about 2014, Respondent was interviewed by the Illinois Department of Human Services OIG Investigator regarding Respondent’s conduct with patient A.P.

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)(5) and (20), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240, 20 ILCS 2105/2105-130, and 20 ILCS 2105/2105-135.

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 Physician and Surgeon License of Josip Pasic, M.D., be suspended, revoked, or otherwise disciplined.

#### COUNT VI

1-3. The Department realleges paragraphs 1 through 3 of Count I as paragraphs 1 through 3 of Count V.

4. At all times herein mentioned, Respondent was practicing psychiatry at 2222 W Division St, Chicago, IL 60622.

5. Information has come to the Department's attention alleging that Respondent has continued to engage in sexually inappropriate behavior and boundary violations with the patients of his psychiatric practice as well as to prescribe narcotics to his patients.

6. Since 2014 to present, Respondent was providing care, treatment and evaluation to patient R.S. for psychiatric disorders.

7. While Respondent was providing care and treatment to patient R.S. between 2014 and present, Respondent authorized and/or prescribed multiple medications, including:

a. Xanax;

b. Paxil;

c. Latuda;

d. Hydrocodone.

8. On or about November 30, 2016, DEA Chicago Field Office conducted inspection of Respondent's registered premises at his registered address [REDACTED]

9. On November 30, 2016, Respondent was interviewed by DEA Diversion Investigators Young and Kasza during the inspection of registered premises, at his registered address [REDACTED]

10. During November 30, 2016 interview, the following information was ascertained by DEA personnel:

a. Respondent initially denied writing prescriptions for narcotic drugs or pain killers and writing prescriptions for family members or friends;

b. When informed by DEA DI Young that Illinois Prescription Monitoring

Program profile indicated that Respondent issued prescriptions for Hydrocodone, Hydromorphone and Tramadol, Respondent initially denied issuing prescriptions for Hydrocodone;

c. When asked if Respondent knew someone named R.S., Respondent indicated that R.S. was a female who is a manager of a nursing home named Beacon Place on the far South Side of Chicago;

d. Respondent went on to say that he knows R.S. for over 20 years;

e. Respondent issued a prescription for Hydrocodone as a favor because R.S. had a bad infection;

f. Respondent denied issuing any other Controlled Substance prescriptions for R.S. other than Hydrocodone;

g. When asked why Respondent prescribed Tramadol, Respondent indicated that he only issues Tramadol to "help patient out" until they can get an appointment to see their regular medical doctor;

h. When asked if Respondent does any medical testing or performs a medical exam to ensure that patients need Tramadol, Respondent indicated no;

i. When asked again if Respondent has issued Controlled Substance prescriptions for friends or family members, Respondent admitted prescribing Promethazine Codeine to several friends, including E.S. who also receives Xanax from Respondent;

j. Respondent denied ordering Geodon and using it to sedate African-American and Hispanic men and to have sex with these men and videotape the sexual encounters without their consent;

k. Respondent denied that he has any pending complaints with the Department;

l. When asked if a patient has ever alleged that Respondent was inappropriate, Respondent indicated no;

m. Subsequently, Respondent indicated that he did not want to discuss any issues without his attorney being present.

11. There is no employee with the initials R.S. who is a manager of Beacon Place.

12. In December 2016, DEA Diversion Investigator (DI) Angelia Young along with the Illinois State Police Sergeant Hector Alejandre and the Illinois State Police Special Agent Daniel Ortiz interviewed patient R.S. who provided the following information regarding Respondent's conduct:

a. Respondent sees patient R.S. monthly at an office located at 2222 W. Division Street, Chicago, IL;

b. Respondent is treating patient R.S. for multiple psychiatric problems;

c. Respondent has prescribed patient R.S. Xanax, Paxil, Latuda, Hydrocodone and Hydromorphone;

d. Patient R.S. admitted that he is recovering drug addict;

e. When asked why Respondent prescribes narcotics, patient R.S. indicated that he was stabbed 5-6 years ago in Puerto Rico and Respondent gives him narcotics for pain;

f. Respondent provides paper prescriptions to patient R.S.;

g. During appointments, Respondent asks if he can do physical examination, closes and locks the door, and touches patient R.S. abdominal and groin area;

h. Respondent made comments to patient R.S. how strong patient R.S. is and how big his "private part" feels;



- i. During one appointment, Respondent began touching patient R.S. and asked the patient if he wanted Respondent's watch;
- j. During another appointment, Respondent tried to pull patient R.S.'s pants down, but when Respondent saw patient R.S. started to panic, Respondent stopped;
- k. During another appointment, Respondent invited patient R.S. to go outside to show patient R.S. his new car;
- l. Respondent has been touching patient R.S. inappropriately for past 2 years, but patient R.S. needs his medications and it can be difficult to find doctors who will accept Medicaid, so he continues to see Respondent;
- m. Patient R.S. indicated that he is embarrassed, he has a pregnant girlfriend and he does not want anyone to know what has happened.

13. 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)(5) and (20), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240, 20 ILCS 2105/2105-130, and 20 ILCS 2105/2105-135.

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 Physician and Surgeon License and the Controlled Substance License of Josip Pasic, 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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LAURA E. FORESTER  
Chief of Medical Prosecutions

Vladimir Lozovski  
Staff Attorney, Medical Prosecutions Unit  
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