

**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,)	No. 2017-04313
v.)	
MANJIT SANDHU, M.D.,)	
License No. 036.089775,)	
CS License No. 336.051506,)	
Respondent.)	

CONSENT ORDER

The Illinois Department of Financial and Professional Regulation, Division of Professional Regulation (Department), by Vaughn G. Bentley, Staff Attorney, and Manjit Sandhu, M.D., Respondent, by and through his counsel, James B. Goldberg, hereby agree to the following:

STIPULATIONS

Respondent holds a Certificate of Registration as a Physician and Surgeon in the State of Illinois, License No. 036.089775 and a Controlled Substance License No. 336.051506. Said licenses are currently suspended. 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 May 8, 2017, the Director of the Division of Professional Regulation entered an Order temporarily suspending Respondent's Physician and Surgeon License and Respondent's Controlled Substance License. See Exhibit A, attached hereto and incorporated herein. The May 8, 2017, Order was based on allegations that Respondent forged at least 20 prescriptions [REDACTED] See Exhibit A. The Department has since received additional information that [REDACTED] The allegation(s) as set forth

herein, if proven to be true would constitute grounds for the Department to revoke, suspend, or otherwise discipline Respondent's license as a Physician and Surgeon on the authority of 225 ILCS 60/22(A)(5), (17), (31), and (33); 720 ILCS 570/304(a)(5) and (6); and 720 ILCS 570/312(h).

As a result of these allegations, an informal conference was held on April 4, 2018. Frank J. Nicolosi, M.D., J.D., was present on behalf of the Medical Disciplinary Board. Scott Risolute, Staff Attorney, was present on behalf of the Department. Respondent appeared in person with his attorney, James B. Goldberg.

Respondent has been advised of the right to a hearing to contest the pending charges and the right to administrative review of any order resulting from said hearing. Respondent knowingly waives each of these rights, as well as the right to administrative review of this Consent 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 Department (Director).

Respondent has freely and willingly 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 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, through Vaughn G. Bentley, Staff Attorney, and Manjit Sandhu, M.D., Respondent, by and through his attorney, James B. Goldberg, hereby agree to the following:

- A. Upon the effective date of this Consent Order, Respondent's Illinois Physician and Surgeon License No. 036.089775 shall remain INDEFINITELY SUSPENDED for a minimum period of six (6) months.
- B. Upon the effective date of this Consent Order, Respondent's Controlled Substance License No. 336.051506 shall remain INDEFINITELY SUSPENDED for a minimum period of six (6) months.
- C. Before filing a Petition for Restoration of said licenses, Respondent must provide evidence that he is capable of practicing with reasonable judgment, skill and safety.
- D. Nothing contained in this Consent Order shall relieve Respondent of any additional requirements for restoration set forth in the Illinois Medical Practice Act or any related statutes or rules.
- E. This Order shall become effective upon approval and signature of the Director.

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DEPARTMENT OF FINANCIAL AND
PROFESSIONAL REGULATION
of the State of Illinois

8/9/18
DATE

8/21/2018
DATE

8/9/2018
DATE

8/15/18
DATE

[REDACTED]
Manjit Sandhu/MD
Respondent

[REDACTED]
James B. Crothers/
Attorney for Respondent

[REDACTED]
Member
Medical Disciplinary Board

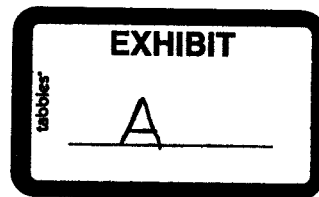
The foregoing Consent Order is approved in full.

DATED THIS 2 day of September, 2018.

DEPARTMENT OF FINANCIAL AND
PROFESSIONAL REGULATION
of the State of Illinois;
Bryan A. Schneider, Secretary
DIVISION OF PROFESSIONAL REGULATION

[REDACTED]
Jessica Baer
Director

RFF: Case No. 2017-004313
Lic. No. 036.089775 336 051506



**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. 2017-04313
Manjit Sandhu, M.D.)	
License Nos. 036.089775/336.051506)	
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 Illinois Controlled Substance License of Respondent, Manjit Sandhu, 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 Manjit Sandhu, M.D., Respondent, in that Respondent's actions constitute an immediate danger to the public.

NOW, THEREFORE, I, JESSICA BAER, DIRECTOR OF THE DIVISION OF PROFESSIONAL REGULATION of the State of Illinois, hereby ORDER that the Illinois Physician and Surgeon License No. 036.089775 and the Illinois Controlled Substance License No. 336.051506 of Manjit Sandhu, 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 8 DAY OF May, 2017.

**DEPARTMENT OF FINANCIAL AND
PROFESSIONAL REGULATION of the State of
Illinois
Division of Professional Regulation
Bryan A. Schneider, Secretary**



JESSICA BARKER
Director

Ref: IDFP Case No. 2017-04313
License No. 036.089775 and CS License No. 336.051506


**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. 2017-04313
Manjit Sandhu, M.D.,)	
License Nos. 036.089775, 336.051506,)	
Respondent)	

PETITION FOR TEMPORARY SUSPENSION

NOW COMES the Complainant, by its Chief of Medical Prosecutions, Laura E. Forester, and Petitions JESSICA BAER, 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 Manjit Sandhu 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. 036.089775, and Controlled Substance License No. 336.051506, issued by the Department of Financial and Professional Regulation of the State of Illinois. Said Illinois Physician and Surgeon License and Controlled Substance License are currently in active status.
2. The Department was contacted on May 4, 2017, by an Illinois physician (Complainant) who indicated that he is a colleague of Respondent and had concerns regarding Respondent's continued practice of medicine.

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3. Specifically, Complainant indicated that Respondent has been acquiring numerous controlled substances by falsifying Complainant's signature on scripts for at least six (6) months.
 4. From at least July of 2016 continuing through April of 2017, Respondent falsified at least twenty (20) scripts for controlled substances including Oxycodone, Amphetamine Salt Combo (Adderall) and Temazepam, and Benzodazepines (Temazepam and Lorazepam) for approximately 1200 dosage units.
 5. 
 6. Brian Zachariah, M.D., Chief Medical Coordinator of the Illinois Department of Financial and Professional Regulation, has been consulted in this matter and believes that the continued practice of medicine by Respondent, Manjit Sandhu, M.D., presents an immediate danger to the safety of the public in the State of Illinois.
 7. 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 Manjit Sandhu, M.D., be **TEMPORARILY SUSPENDED** pending proceedings before the Medical Disciplinary Board of the State of Illinois.

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

By: 

Laura E. Forester
Chief of Medical Prosecutions

Laura E. Forester
Chief of Medical Prosecution
Department of Financial and Professional Regulation
Division of Professional Regulation
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**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. 2017-04313
Manjit Sandhu, M.D.,)	
License No. 036.089775,)	
Controlled Substances License)	
No. 336.051506)	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 Manjit Sandhu, M.D., Respondent, states 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. 036.089775, and Controlled Substance License No. 336.051506, 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 State of Illinois.

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4. At all times herein mentioned, Respondent was a holder of Drug Enforcement Agency (DEA) Registration No. BF2923680, registered to 2800 N. Sheridan Road, Chicago, Illinois 60657.
 5. On or about May 4, 2017, the Department received information that Respondent fraudulently obtained multiple controlled substances by forging the signature of another physician on the scripts.
 6. Specifically, Respondent falsified the following prescriptions between July 21, 2016, and April 14, 2017:
 - a. On July 21, 2016, Respondent falsified a prescription for Lyrica, 25 mg, 30 tablets;
 - b. On July 21, 2016, Respondent falsified a prescription for Oxycodone HCL-Acetaminophen 10mg/325 mg for 70 tablets;
 - c. On August 6, 2016, Respondent falsified a prescription for Oxycodone HCL-Acetaminophen 10mg/325 mg for 100 tablets;
 - d. On September 15, 2016, Respondent falsified a prescription for Lorazepam 2 mg for 60 tablets;
 - e. On September 15, 2016, Respondent falsified a prescription for Amphetamine Salt Combo (Adderall) 20 mg for 45 tablets;
 - f. On September 15, 2016, Respondent falsified a prescription for Oxycodone HCL-Acetaminophen 10mg/325 mg for 100 tablets;
 - g. On October 14, 2016, Respondent falsified a prescription for Oxycodone HCL-Acetaminophen 10mg/325 mg for 100 tablets;

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- h. On October 26, 2016, Respondent falsified a prescription for Amphetamine Salt Combo (Adderall) 20 mg for 45 tablets;
 - i. On November 12, 2016, Respondent falsified a prescription for Temazepam 30 mg for 30 tablets;
 - j. On November 12, 2016, Respondent falsified a prescription for Oxycodone HCL-Acetaminophen 10mg/325 mg for 100 tablets;
 - k. On November 25, 2016, Respondent falsified a prescription for Amphetamine Salt Combo (Adderall) 20 mg for 45 tablets;
 - l. On December 9, 2016, Respondent falsified a prescription for Oxycodone HCL-Acetaminophen 10mg/325 mg for 100 tablets;
 - m. On January 4, 2017, Respondent falsified a prescription for Oxycodone HCL-Acetaminophen 10mg/325 mg for 100 tablets;
 - n. On January 7, 2017, Respondent falsified a prescription for Amphetamine Salt Combo (Adderall) 20 mg for 45 tablets;
 - o. On February 1, 2017, Respondent falsified a prescription for Oxycodone HCL-Acetaminophen 10mg/325 mg for 100 tablets;
 - p. On February 5, 2017, Respondent falsified a prescription Amphetamine Salt Combo (Adderall) 20 mg for 45 tablets;
 - q. On March 4, 2017, Respondent falsified a prescription for Oxycodone HCL-Acetaminophen 10mg/325 mg for 100 tablets;
 - r. On March 7, 2017, Respondent falsified a prescription Amphetamine Salt Combo (Adderall) 20 mg for 45 tablets;

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- s. On March 30, 2017, Respondent falsified a prescription for Oxycodone HCL-Acetaminophen 10mg/325 mg for 100 tablets;
- t. On March 7, 2017, Respondent falsified a prescription Amphetamine Salt Combo (Adderall) 20 mg for 45 tablets.
7. At no time did [REDACTED] authorize the prescriptions set forth above.
8. [REDACTED]
9. There was no clinical purpose and/or indication for Respondent to authorize and/or issue the multiple prescriptions set forth above.
10. While Respondent was fraudulently obtaining multiple controlled substances from the Osco Drug in Deerfield, Illinois, Respondent knew and/or should have known that controlled substances are associated with high risk of drug abuse and/or addiction.
11. 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), paragraphs (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)

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 Controlled

Substance License of Manjit Sandhu, M.D., be suspended, revoked, or otherwise disciplined.

COUNT II

1-53. The Department hereby adopts and realleges paragraphs 1 through 53 of Count I of this Complaint as paragraphs 1 through 53 of Count II.

54. 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 (17).

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 Controlled Substance License of Manjit Sandhu, M.D., be suspended, revoked, or otherwise disciplined.

COUNT III

1-53. The Department hereby adopts and realleges paragraphs 1 through 53 of Count I of this Complaint as paragraphs 1 through 53 of Count III.

54. 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 (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 and Controlled Substance License of Manjit Sandhu, M.D., be suspended, revoked, or otherwise disciplined.

COUNT IV

1-53. The Department hereby adopts and realleges paragraphs 1 through 53 of Count I of this Complaint as paragraphs 1 through 53 of Count IV.

54. The foregoing acts and/or omissions are grounds for revocation, suspension, or other discipline of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes, Section 60/22(A)(33) and 720 Illinois Compiled Statutes, Section 570/304(a)(5) and (6) and 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 Physician and Surgeon License and Controlled Substance License of Manjit Sandhu, 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

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