

**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. 2019-9477
Zachary Solomon, M.D.	)	
License No. 036.099677,	)	Respondent.

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION  
CLERK OF THE COURT  
21 APR 23 PM 2:47

**NOTICE OF PRELIMINARY HEARING**

TO: ZACHARY SOLOMON MD




On **Monday, May 17, 2021 at 1:00 p.m. CST**, you are directed to appear in person or by telephone before an Administrative Law Judge of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation (“Department”) located at the James R. Thompson Center at 100 West Randolph Street, 9<sup>th</sup> Floor, Suite 9-300, Chicago, Illinois 60601. **To appear by telephone, dial (312) 535-8110 and enter the access code of 284 684 704.** The purpose of the Preliminary Hearing is to set a date on which all parties expect to be prepared to proceed with their case and to rule on any preliminary motions that are presented. Your appearance on the scheduled date is mandatory and may be made personally or through an attorney admitted to practice in Illinois. **If you decide to appear in person**, please arrive early with proper identification (such as a driver’s license, state I.D., or passport) and allow time to pass through security. **Additionally, in order to enter the building, you may be required to comply with COVID-19 safety measures imposed at the time by Central Management Services, such as observing social distancing, wearing a face covering, and having your temperature taken.** **If appearing by telephone, call and enter the access code no later than five (5) minutes prior to the scheduled hearing, and check in with the system administrator. You may be placed on hold until your case is called, and you must be immediately available when your case is called.**

You are required to file a signed answer to the attached Complaint within twenty (20) days of the of the mailing date stamped on this Notice. The answer should address each numbered paragraph of the Complaint. For each paragraph, the answer should either: (1) admit the allegation in the paragraph; (2) deny the allegation in the paragraph; or (3) state under oath that you have insufficient information to admit or deny the allegation in the paragraph. Any motions presented on the above date should be mailed or personally delivered at least five (5) business days in advance. Your answer and/or any motions should be mailed or personally served to the Illinois Department of Financial and Professional Regulation, Division of Professional Regulation, Clerk of the Court, 100 West Randolph Street Suite 9-300, Chicago, Illinois 60601.

Failure to file a signed answer may subject you to being held in default. If you are held in default, the Illinois Medical Disciplinary Board may assume the allegations to be true and will issue a recommendation based upon those facts without a hearing being held. Information regarding the Department’s legal authority, jurisdiction and

the substantive Act involved can be found in the attached Complaint. All relevant statutes, administrative rules, and the Department's Rules of Practice in Administrative Hearings, 68 IAC 1110/et seq., are available on the Department's website at [www.idfpr.com](http://www.idfpr.com). Please be aware that you are required to maintain a current address and email address of record with the Department and may do so by selecting "Online Address Change" on the Department's website at [www.idfpr.com](http://www.idfpr.com).

**DEPARTMENT OF FINANCIAL AND  
PROFESSIONAL REGULATION**  
of the State of Illinois, Mario Treto, Jr., Acting Secretary  
Division of Professional Regulation

  
Vladimir Lozovsky  
Attorney for Department

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PROOF OF SERVICE

STATE OF ILLINOIS                    )                    SS: No. 2019-9477

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 Notice of Preliminary Hearing and Department's Complaint to be emailed to Respondent at his last known email address with the Department on April 23, 2021

  
Affiant

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

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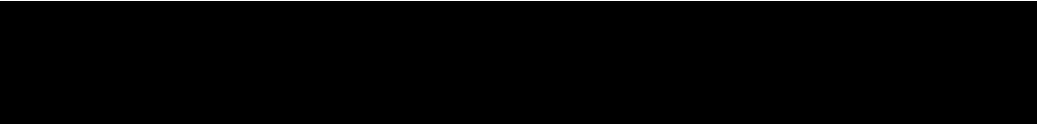
DEPARTMENT OF FINANCIAL AND )  
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of the State of Illinois, ) Complainant, )  
v. )  
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License No. 036.099677, ) Respondent. )

No. 2019-9477

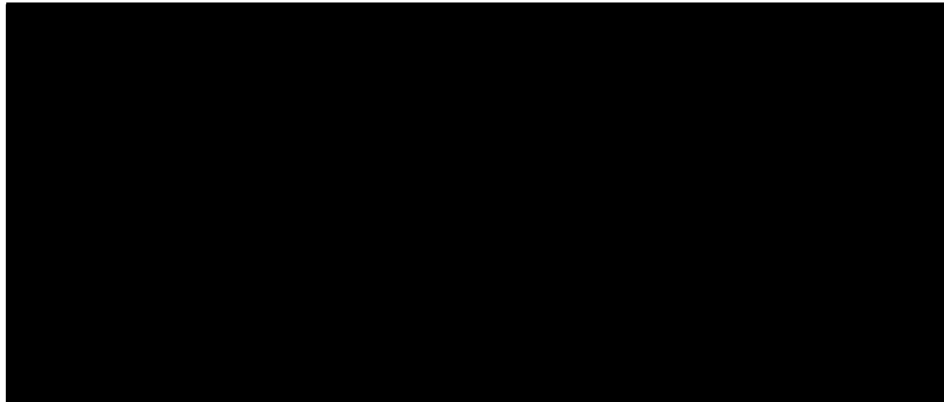
**COMPLAINT**

NOW COMES the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF PROFESSIONAL REGULATION, of the State of Illinois, by its Chief of Medical Prosecutions, Frank Lamas, and as its COMPLAINT against Zachary Solomon, M.D., Respondent, complains as follows:

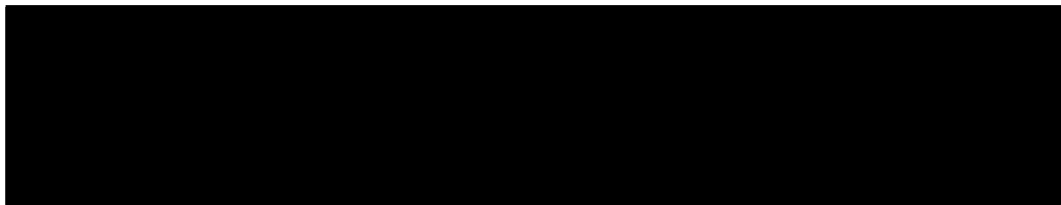
**COUNT I**

1. Respondent is presently the holder of a Certificate of Registration as a Physician and Surgeon in the State of Illinois, License No. 036.099677, issued by the Department of Financial and Professional Regulation of the State of Illinois. Said license is 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. Respondent has specialized in psychiatric care in Highland Park, Illinois.
4. Information has come to the Department's attention that while Respondent was a Psychiatry Specialist in Highland Park, Illinois, he engaged in sexually inappropriate conduct with a patient of his practice.
5. 

- a.
- b.
- c.
- d.



6.



7.



8.



- 9. In 2015, patient [REDACTED] and her husband befriended Respondent and Respondent's wife while seeing them at a social event
- 10. From 2015-2017, patient [REDACTED] and her husband and Respondent and his wife would socialize at Respondent's residence.
- 11. During aforementioned social gatherings in 2015-2017, Respondent and patient [REDACTED] would use cannabis.
- 12. From 2015-2017, Respondent and his wife repeatedly invited patient [REDACTED] to spend time in their bedroom with them.

13. [REDACTED]

14. After attending the Las Vegas conference, Respondent repeatedly asked patient [REDACTED] to consume LSD [REDACTED]

15. Patient [REDACTED] continuously declined Respondent's advise to use LSD [REDACTED]  
[REDACTED]

16. At one of the visits at Respondent's residence in 2017, Respondent provided patient [REDACTED] with Xanax tablet.

17. At one of the visits at Respondent's residence in 2017, Respondent instructed patient [REDACTED] to lay down on his bed after he provided patient [REDACTED] with Xanax.

18. On or about September 28, 2017, Respondent provided patient [REDACTED] with a Physician Written Certification Form for the Illinois Medical Cannabis Pilot Program while at Respondent's residence.

19. In November 2017, while patient [REDACTED] and Respondent were conversing in his kitchen, Respondent grabbed and groped patient [REDACTED] breasts.

20. [REDACTED]

21. After the November 2017 incident, patient [REDACTED] dissociated herself from Respondent.

22. On or about March 28, 2019, patient [REDACTED] filed a police report with the Deerfield Police Department regarding the November 2017 incident with Respondent.

23. On or about March 11, 2020, Department investigator Stephanie M. Seibert (“Investigator Seibert”) interviewed Respondent.


24. During the March 11, 2020 interview, Respondent described his procedure for writing a certification for the Medical Cannabis Pilot Program as follows that:

- a. Respondent must see the patient in his office, and
- b. Must have a psychological reason for the medication prescribed.


25. 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) and (20), 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) and (b).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF PROFESSIONAL REGULATION, of the State of Illinois, by Frank Lamas, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License of Zachary Solomon, M.D., be suspended, revoked, or otherwise disciplined.

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

  
**Frank Lamas (V.L.)  
Chief of Medical Prosecution**

Vladimir Lozovskiy  
Staff Attorney, Medical Prosecutions Unit  
Department of Financial and Professional Regulation  
Division of Professional Regulation  
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