



COMMONWEALTH of VIRGINIA

Department of Health Professions

Perimeter Center
9960 Mayland Drive, Suite 300
Richmond, Virginia 23233-1463

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Sandra Whitley Ryals
Director

January 29, 2009

Mohammed K.B. Soori, M.D.
2232 Devore Court, Bay Beach
Virginia Beach, Virginia 23451

UPS OVERNIGHT

and

1141 First Colonial Road
Virginia Beach, Virginia 23454

RE: License No.: 0101-237535

Dear Dr. Soori:

I enclose a certified copy of the Virginia Board of Medicine's Order of Summary Suspension entered January 29, 2009, affecting your license to practice medicine and surgery in the Commonwealth of Virginia.

Effective immediately, it shall be unlawful for you to treat patients, prescribe medications, or otherwise practice medicine, or hold yourself out as a licensed physician in the Commonwealth of Virginia.

Further, in accordance with Sections 54.1-105, 54.1-110, 54.1-2408.1, 54.1-2920, 2.2-4020 and 2.2-4021 of the Code of Virginia (1950), as amended ("Code"), you are hereby given notice that the Virginia Board of Medicine ("Board") will convene a formal administrative hearing to receive and act upon evidence that you may have violated certain laws governing the practice of medicine and surgery in Virginia, as set forth in the attached Statement of Particulars.

The formal administrative hearing will be held in accordance with the provisions of Sections 54.1-2400(11) and 2.2-4024.F of the Code, before a panel of the Board, with a member of the Board presiding. You have been scheduled to appear before the Board on Friday, February 20, 2009, at 9:15 a.m., in the offices of the Department of Health Professions, 9960 Mayland Drive, 2nd Floor, Richmond, Virginia. A map is enclosed for your convenience.

Please register with the receptionist on the 2nd Floor, and be seated in the waiting area. You will be called with the Board is ready to meet with you.

You have the following rights, among others: to be accompanied by and represented by counsel, to submit oral and documentary evidence and rebuttal proofs, to conduct such cross-examination as may elicit a full and fair disclosure of the facts, and to have the proceedings completed and a decision made with dispatch. Should you wish to subpoena witnesses, requests for subpoenas must be made, in writing, in accordance with the enclosed Instructions for Requesting Subpoenas.

Please carefully read the following paragraphs, which contain date-sensitive and important information regarding this proceeding.

COMMONWEALTH'S EVIDENCE

You have the right to the information that will be used by the Board in reaching a decision regarding this matter; therefore, I enclose the Commonwealth's evidence. Please note that these documents are enclosed only with the original notice sent by UPS Overnight mail. Further, if you are represented, it is your responsibility to provide the enclosed materials to your attorney. If you have any questions regarding the content of this package, you must contact Assistant Attorney General Clay Garrett at (804) 786-0030.

Should you wish to file any objections to the Commonwealth's evidence, you must send your written objections to me, at the address on this letterhead, no later **February 5, 2009**. If you have not filed any objections by February 5, 2009, the exhibits will be distributed to the Board members for their review prior to your hearing, and will be considered by the Board as evidence when it deliberates upon your case. If you do file objections, the Commonwealth has until **February 9, 2009**, to file a response to the objections, in writing and addressed to me at the Board office. The chairperson of the proceeding will rule on the motion.

RESPONDENT'S EVIDENCE

Further, should you wish for the Board to consider additional information relative to this proceeding, you must submit fifteen (15) copies of any such documents to Renee S. Dixon, Discipline Case Manager, Virginia Board of Medicine, 9960 Mayland Drive, Suite 300, Richmond, Virginia, 23233, by **February 5, 2009**. You may not submit your documents by facsimile or e-mail.

The Commonwealth must file any objections to your submissions in writing, addressed to me at the Board office, no later than **February 9, 2009**. If no objections have been received by **February 9, 2009**, the evidence will be distributed to the Board members for

their review, and will be considered by the Board as evidence when it deliberates upon your case. If the Commonwealth raises objections, you have until **February 11, 2009**, to file your response to the objections, in writing and addressed to me at the Board office. The chairperson of the proceeding will rule on the motion.

OTHER PRE-HEARING MOTIONS

If you or Assistant Attorney General Clay Garrett wish to make any pre-hearing motions regarding matters other than the exhibits, including offers of settlement, each of you is directed to file motions, in writing, addressed to me at the Board office by **February 3, 2009**. Responses to motions filed must be submitted by **February 5, 2009**. The chairperson of the proceeding will rule on the motion.

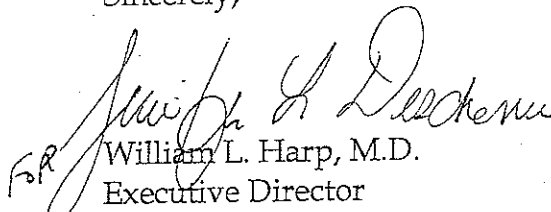
REQUEST FOR A CONTINUANCE

Absent exigent circumstances, such as personal or family illness, a request for a continuance after **February 9, 2009**, will not be considered. If you obtain counsel, you should do so as soon as possible, as a motion for a continuance due to the unavailability of counsel will not be considered unless received by **February 9, 2009**.

Relevant sections of the Administrative Process Act, which govern proceedings of this nature, as well as laws relating to the practice of medicine and other healing arts in Virginia cited in this notice can be found at <http://leg1.state.va.us>. To access this information, please click on *Code of Virginia* for laws and *Virginia Administrative Code* for regulations.

Please indicate, by letter to this office, your intention to be present.

Sincerely,


FOR
William L. Harp, M.D.
Executive Director
Virginia Board of Medicine

MBS/SSnotice

Enclosures:

Order of Summary Suspension entered January 29, 2009
Statement of Particulars
Attachment I
Commonwealths Exhibits
Instructions for Requesting Subpoenas
Map

Notice of Formal Hearing - Mohammad K.B. Soori, M.D.

January 29, 2009

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cc: Stephen E. Heretick, J.D., President, Virginia Board of Medicine
Sandra Whitley Ryals, Director, Department of Health Professions
Renée S. Dixon, Discipline Case Manager, Board of Medicine
Wm. Clay Garrett, Assistant Attorney General
Mary Beth Shelton, Adjudication Specialist, APD
Lorraine McGehee, Deputy Director, APD
Charlotte Hudson, R.N., B.S.N., M.S.W., Senior Investigator [119578, 121112]

VIRGINIA:

BEFORE THE BOARD OF MEDICINE

IN RE: MOHAMMED K. B. SOORI, M.D.
License No.: 0101-237535

STATEMENT OF PARTICULARS

The Virginia Board of Medicine ("Board") alleges that:

1. From approximately September 2006 through February 22, 2008, Dr. Soori provided counseling to Patient A and her husband including counseling related to marital issues. From on or about October 30, 2006, through on or about June 23, 2008, Dr. Soori provided individual counseling to Patient A. During the course of treatment:

a. Dr. Soori may have violated Sections § 54.1-2915.A(3), (12), (13), (16), (18) and (19) of the Code of Virginia (1950), as amended ("Code"), and 18 VAC 85-20-100 of the Board of Medicine General Regulations in that, from on or about January 14, 2008, through on or about June 6, 2008, Dr. Soori engaged in a personal and sexual relationship with Patient A concurrent with and by virtue of the practitioner/patient relationship. This contact occurred during the course of treatment sessions within the doctor's office and in settings outside of his office but while the patient was still undergoing treatment.

b. Dr. Soori may have violated Sections 54.1-2915.A(3), (13), (16) and (17), 54.1-3303.A, and Section 54.1-3408 of the Code in that, from on or about May 8, 2007, through on or about May 15, 2008, Dr. Soori wrote approximately 7 prescriptions for Patient A, each for 60 tablets of hydrocodone (Schedule III), without medical justification. The initial prescription was issued without a physical examination

documented at the time of issuance or any diagnostic testing and the patient reports that no physical examinations occurred during the course of treatment. By his own admission, Dr. Soori admitted to having never performed a physical examination or ordering any diagnostic testing related to her course treatment with narcotics.

2. From on or about August 22, 2006 through on or about December 24, 2007, Dr. Soori provided individual counseling to Patient B. During the course of treatment, Dr. Soori may have violated Sections 54.1-2915.A(3), (12), (13), (16), (18) and (19) of the Code and 18 VAC 85-20-100 of the Board of Medicine General Regulations in that, Dr. Soori engaged in sexual behavior with this patient to include sexual comments, hugging and, on December 24, 2007, kissing, concurrent with and by virtue of the practitioner/patient relationship, and/or otherwise engaged in conduct of a sexual nature that was lewd and offensive.

3. From on or about March 17, 2004 through June 25, 2005, Dr. Soori provided individual counseling to Patient C, a patient being treated in New York while Dr. Soori was actively licensed to practice in Virginia. During the course of treatment, Dr. Soori may have violated Sections 54.1-2915.A(3), (13), (16), (18) and (19) of the Code and 18 VAC 85-20-100 of the Board of Medicine General Regulations in that, from approximately June 2004 through June 25, 2005, Dr. Soori engaged in a personal and sexual relationship with this patient concurrent with and by virtue of the practitioner/patient relationship. The patient continued to contact Dr. Soori via telephone after he relocated his primary practice to Virginia and he offered to continue prescribing for the patient while he was in Virginia.

4. From on or about July 2006 through July 2008, Dr. Soori provided individual counseling to Patient D for issues related to mental health concerns and chronic pain. A review

of this patient's records disclosed Dr. Soori may have violated Sections 54.1-2915.A(3), (12), (13), (16), (17), and (18), 54.1-3303.A and Section 54.1-3408 of the Code, and 18 VAC 85-20-26(C) of the Board of Medicine General Regulations in that, he prescribed approximately 1260 Lorazepam tablets (Schedule IV), 180 Fentanyl transdermal patches (Schedule II), and 4320 oxycodone tablets (Schedule II) for this patient without medical justification. Although Dr. Soori considers himself a pain management specialist, he failed to utilize pain management contracts and/or was unable to produced signed copies of a contract for the patient. By his own admission, he failed to perform or document a physical examination of the patient during the course of pain management. Further, Dr. Soori failed to coordinate care with primary care physicians, obtain diagnostic studies, review prior diagnostic studies or utilize urine drug screens related to the pain management treatment.

5. From on or about May 14, 2007 through June 30, 2008, Dr. Soori provided individual counseling to Patient E for mental health concerns and chronic pain. A review of this patient's records disclosed Dr. Soori may have violated Sections 54.1-2915.A(3), (13), (16) and (17), 54.1-3303.A and 54.1-3408 of the Code in that, he prescribed approximately 990 oxycodone tablets, 10 Fentanyl transdermal patches, and 720 hydrocodone tablets for this patient without medical justification. Although Dr. Soori considers himself a pain management specialist, he failed to utilize pain management contracts and/or was unable to produced signed copies of a contract for the patient. By his own admission, he failed to perform or document a physical examination of the patient during the course of pain management. Further, Dr. Soori failed to coordinate care with primary care physicians, obtain diagnostic

studies, review prior diagnostic studies or utilize urine drug screens related to the pain management treatment.

6. From on or about January 11, 2007 through July 2008, Dr. Soori provided individual counseling to Patient F for issues related to mental health concerns and chronic pain. A review of this patient's records disclosed Dr. Soori may have violated Sections 54.1-2915.A(3), (12), (13), (16), (17) and (18), 54.1-3303.A, and Section 54.1-3408 of the Code and 18 VAC 85-20-26(C) of the Board of Medicine General Regulations in that, he prescribed approximately 4040 oxycodone tablets, 140 Fentanyl transdermal patches, 340 dextroamphetamine sulfate sustained release tablets, 90 hydrocodone tablets, 90 Clonazepam tablets (Schedule IV), and 480 Lorazepam tablets (Schedule IV) for this patient without medical justification. Although Dr. Soori considers himself a pain management specialist, he failed to utilize pain management contracts and/or was unable to produced signed copies of a contract for the patient. By his own admission, he failed to perform or document a physical examination of the patient during the course of pain management. Further, Dr. Soori failed to coordinate care with primary care physicians, obtain diagnostic studies, review prior diagnostic studies or utilize urine drug screens related to the pain management treatment.

7. From on or about July 5, 2005 through July 10, 2008, Dr. Soori provided individual counseling to Patient G for issues related to mental health issues, polysubstance abuse and chronic pain. A review of this patient's records disclosed Dr. Soori may have violated Sections 54.1-2915.A(3), (12), (13), (16), (17) and (18), 54.1-3303.A and Section 54.1-3408 of the Code, and 18 VAC 85-20-26(C) of the Board of Medicine General Regulations in that, he prescribed approximately 3161 oxycodone tablets, 300 hydromorphone tablets, 1012 Adderall