BEFORE THE ARIZONA MEDICAL BOARD

In the Matter of

KARNAIL S. DHILLON, M.D.

Case No. MD-16-1106A

Holder of License No. 27921
For the Practice of Allopathic Medicine
In the State of Arizona.

INTERIM CONSENT AGREEMENT

Karnail S. Dhillon, M.D. ("Respondent") elects to permanently waive any right to a
hearing and appeal with respect to this Interim Consent Agreement for Practice Restriction
and consents to the entry of this Order by the Arizona Medical Board ("Board").

INTERIM FINDINGS OF FACT

1. The Board is the duly constituted authority for the regulation and control of
the practice of allopathic medicine in the State of Arizona.

2. Respondent is the holder of License No. 27921 for the practice of allopathic
medicine in the State of Arizona.

3. The Board initiated case number MD-16-1106A after receiving a complaint
regarding Respondent's care and treatment of a 31 year-old male patient ("JH") alleging
inappropriate prescribing of Suboxone in combination with alprazolam.

4. A Medical Consultant ("MC") who reviewed Respondent's care of JH and five
other patients (TB, BP, ML, JJ, and KW) noted deviations from the standard of care for
each patient reviewed. The MC stated that of five patients reviewed who were being
treated for opioid dependence with Suboxone (JH, TB, BP, ML and JJ), Respondent
deviated from the standard of care by failing to conduct random urine drug screens and by
failing to review the Controlled Substance Prescription Monitoring Program ("CSPMP")
database. For patient JJ, the MC found that Respondent deviated from the standard of
care by failing to respond to patterns of early refills and multiple reports from pharmacies
that JJ was filling prescriptions from multiple doctors at different pharmacies, and by
prescribing excessive dosages of Adderall to JJ.

5. The MC found that for patient KW, who Respondent was treating for
Attention Deficit Disorder, mood disorder NOS and alcohol abuse, Respondent deviated
from the standard of care by failing to respond to regular early refill requests for prescribed
medications.

6. Actual harm was identified in that patient JJ appeared to be actively abusing
prescribed medications, which was not addressed by Respondent. Patient KW received
inappropriate amounts of medication in the form of early renewals. The MC noted that all
patients were at risk for abuse and overdose as a result of Respondent’s lack of consistent
and meaningful drug screening protocol.

7. The aforementioned information was presented to the investigative staff, the
medical consultant and the lead Board member. All reviewed the information and concur
that the interim consent agreement to restrict Respondent’s controlled substance
prescribing pending the outcome of a formal interview or formal hearing is appropriate.

8. The investigation into this matter is pending Board review.

    INTERIM CONCLUSIONS OF LAW

1. The Board possesses jurisdiction over the subject matter hereof and over
Respondent.

2. Pursuant to A.R.S. § 32-1405(C)(25) the Executive Director has authority to
enter into a consent agreement when there is evidence of danger to the public health and
safety.

3. Pursuant to A.A.C. R4-16-504, the Executive Director may enter into an
interim consent agreement when there is evidence that a restriction is needed to mitigate
imminent danger to the public's health and safety. Investigative staff, the Board's medical consultant and the lead Board member have reviewed the case and concur that an interim consent agreement is appropriate.

**INTERIM ORDER**

IT IS HEREBY ORDERED THAT:

1. Respondent is prohibited from prescribing controlled substances in the State of Arizona pending the outcome of a formal interview or formal hearing in this matter.

2. Respondent may request, in writing, release and/or modification of this Interim Consent Agreement. The Executive Director, in consultation with and agreement of the lead Board member and the Chief Medical Consultant, has the discretion to determine whether it is appropriate to release Respondent from this Interim Consent Agreement.

3. The Board retains jurisdiction and may initiate new action based upon any violation of this Interim Consent Agreement, including, but not limited to, summarily suspending Respondent's license.

4. Because this is an Interim Consent Agreement and not a final decision by the Board regarding the investigation, it is subject to further consideration by the Board.

5. This Interim Consent Agreement shall be effective on the date signed by the Board's Executive Director.

**RECITALS**

Respondent understands and agrees that:

1. The Board, through its Executive Director, may adopt this Interim Consent Agreement, or any part thereof, pursuant to A.R.S. § 32-1405(C)(25) and A.A.C. R4-16-504.

2. Respondent has read and understands this Interim Consent Agreement as set forth herein, and has had the opportunity to discuss this Interim Consent Agreement
with an attorney or has waived the opportunity to discuss this Interim Consent Agreement with an attorney. Respondent voluntarily enters into this Interim Consent Agreement and by doing so agrees to abide by all of its terms and conditions.

3. By entering into this Interim Consent Agreement, Respondent freely and voluntarily relinquishes all rights to an administrative hearing on the matters set forth herein, as well as all rights of rehearing, review, reconsideration, appeal, judicial review or any other administrative and/or judicial action, concerning the matters related to the Interim Consent Agreement.

4. Respondent understands that this Interim Consent Agreement does not constitute a dismissal or resolution of this matter or any matters that may be currently pending before the Board and does not constitute any waiver, express or implied, of the Board’s statutory authority or jurisdiction regarding this or any other pending or future investigations, actions, or proceedings. Respondent also understands that acceptance of this Interim Consent Agreement does not preclude any other agency, subdivision, or officer of this State from instituting civil or criminal proceedings with respect to the conduct that is the subject of this Interim Consent Agreement. Respondent further does not relinquish his rights to an administrative hearing, rehearing, review, reconsideration, judicial review or any other administrative and/or judicial action, concerning the matters related to a final disposition of this matter, unless he/she affirmatively does so as part of the final resolution of this matter.

5. Respondent acknowledges and agrees that upon signing this Interim Consent Agreement and returning it to the Board’s Executive Director, Respondent may not revoke his acceptance of this Interim Consent Agreement or make any modifications to
it. Any modification of this original document is ineffective and void unless mutually
approved by the parties in writing.

6. Respondent understands that this Interim Consent Agreement shall not
become effective unless and until it is signed by the Board’s Executive Director.

7. Respondent understands and agrees that if the Board’s Executive Director
does not adopt this Interim Consent Agreement, he will not assert in any future
proceedings that the Board’s consideration of this Interim Consent Agreement constitutes
bias, prejudice, prejudgetment, or other similar defense.

8. Respondent understands that this Interim Consent Agreement is a public
record that may be publicly disseminated as a formal action of the Board, and that it shall
be reported as required by law to the National Practitioner Data Bank.

9. Respondent understands that this Interim Consent Agreement does not
alleviate his/her responsibility to comply with the applicable license-renewal statutes and
rules. If this Interim Consent Agreement remains in effect at the time Respondent’s
allopathic medical license comes up for renewal, he/she must renew his license if
Respondent wishes to retain his license. If Respondent elects not to renew his license as
prescribed by statute and rule, Respondent’s license will not expire but rather, by
operation of law (A.R.S. § 32-3202), become suspended until the Board takes final action
in this matter. Once the Board takes final action, in order for Respondent to be licensed in
the future, he must submit a new application for licensure and meet all of the requirements
set forth in the statutes and rules at that time.

10. Respondent understands that any violation of this Interim Consent
Agreement constitutes unprofessional conduct under A.R.S. § 32-1401(27)(r) ("[v]iolating a
formal order, probation, consent agreement or stipulation issued or entered into by the
board or its executive director under this chapter.

KARNAIL S. DHILLON, M.D.

DATED: 3/15/18

DATED this 15th day of March, 2018.

ARIZONA MEDICAL BOARD

By Patricia E. McSorley
Executive Director

EXECUTED COPY of the foregoing e-mailed
this 15th day of March, 2018 to:

J. Arthur Eaves
Sanders & Parks
3030 N 3rd St, Suite 1300
Phoenix, Arizona 85012-3099
Attorney for Respondent

ORIGINAL of the foregoing filed
this 15th day of March, 2018 with:

Arizona Medical Board
1740 West Adams, Suite 4000
Phoenix, Arizona 85007

Board staff