

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

PETITIONER,

v.

CASE NO. 2021-14362

VADIM YURI BARAM, M.D.,

RESPONDENT.

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ADMINISTRATIVE COMPLAINT

Petitioner, Department of Health, by and through its undersigned counsel, hereby files this Administrative Complaint before the Board of Medicine against Respondent, Vadim Yuri Baram, M.D., and in support thereof alleges:

1. Petitioner is the state agency charged with regulating the practice of medicine pursuant to section 20.43, Florida Statutes; chapter 456, Florida Statutes; and chapter 458, Florida Statutes.

2. At all times material to this Complaint, Respondent was a licensed physician within the state of Florida, having been issued license number ME 108111.

3. Respondent's address of record is 10420 Old Olive Street, Suite 205, Saint Louis, MO 63141.

4. At all times material to this Complaint, Respondent was also a licensed physician within the state of Missouri, having been issued license number 2004022302.

5. The Missouri State Board of Registration for the Healing Arts (Missouri Board) is the licensing authority regulating the practice of medicine in the state of Missouri.

6. On or about May 13, 2021, the Missouri Board issued a Findings of Fact, Conclusions of Law, and Disciplinary Order (Disciplinary Order) disciplining Respondent's Missouri medical license for performing inappropriate or unnecessary treatment and failing to maintain medical records.

7. The Disciplinary Order entered by the Missouri Board constitutes action against Respondent's license to practice medicine in Missouri.

8. Section 458.331(1)(b), Florida Statutes (2020), sets forth grounds for disciplinary action by the Board of Medicine and provides that having a license or the authority to practice medicine revoked, suspended, or otherwise acted against, including the denial of licensure, by the licensing authority of another jurisdiction constitutes grounds for discipline.

9. The Missouri Board acted against Respondent's license to practice medicine on Missouri when it issued a Disciplinary Order against Respondent's license on or about May 13, 2021.

10. Based on the foregoing Respondent has violated section 458.331(1)(b), Florida Statutes (2020), by having his license acted against by the licensing authority of Missouri.

WHEREFORE, Petitioner respectfully requests that the Board of Medicine enter an order imposing one or more of the following penalties: permanent revocation or suspension of Respondent's license, restriction of practice, imposition of an administrative fine, issuance of a reprimand, placement of the Respondent on probation, corrective action, refund of fees billed or collected, remedial education and/or any other relief that the Board deems appropriate.

SIGNED this 18th day of May, 2022.

Joseph A. Ladapo, MD, PhD
State Surgeon General

Sarah Corrigan

FILED
DEPARTMENT OF HEALTH
DEPUTY CLERK
CLERK: *Elizabeth Eubanks*
DATE: **MAY 18 2022**

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SEC/dm
PCP: May 13, 2022
PCP Members: Seela Ramesh, M.D.
Eleonor Pimentel, M.D.
Maria Garcia

NOTICE OF RIGHTS

Respondent has the right to request a hearing to be conducted in accordance with Section 120.569 and 120.57, Florida Statutes, to be represented by counsel or other qualified representative, to present evidence and argument, to call and cross-examine witnesses and to have subpoena and subpoena duces tecum issued on his or her behalf if a hearing is requested. A request or petition for an administrative hearing must be in writing and must be received by the Department within 21 days from the day Respondent received the Administrative Complaint, pursuant to Rule 28-106.111(2), Florida Administrative Code. If Respondent fails to request a hearing within 21 days of receipt of this Administrative Complaint, Respondent waives the right to request a hearing on the facts alleged in this Administrative Complaint pursuant to Rule 28-106.111(4), Florida Administrative Code. Any request for an administrative proceeding to challenge or contest the material facts or charges contained in the Administrative Complaint must conform to Rule 28-106.2015(5), Florida Administrative Code.

Please be advised that mediation under Section 120.573, Florida Statutes, is not available for administrative disputes involving this agency action.

NOTICE REGARDING ASSESSMENT OF COSTS

Respondent is placed on notice that Petitioner has incurred costs related to the investigation and prosecution of this matter. Pursuant to Section 456.072(4), Florida Statutes, the Board shall assess costs related to the investigation and prosecution of a disciplinary matter, which may include attorney hours and costs, on the Respondent in addition any other discipline imposed.