

**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,)	
)	
v.)	No. 2019-10129
)	
DONALD ROBERT RADEN, M.D.,)	
)	
License No. 036.117225,)	
)	
Respondent.)	

CONSENT ORDER

The Department of Financial and Professional Regulation of the State of Illinois, Division of Professional Regulation (“Department”), by and through Daniel Valentín, Staff Attorney, and DONALD ROBERT RADEN, M.D., (“Respondent”), by and through his attorney, Mark Meyer, hereby agree to the following:

STIPULATIONS

Respondent holds a Certificate of Registration as a Licensed Physician and Surgeon in the State of Illinois, License No. 036.117225, which is currently in ACTIVE status. At all times material to the matter set forth in this Consent Order, the Department had jurisdiction over the subject matter and the parties herein.

On October 17, 2019, the Department received a referral from another state agency noting multiple concerns with Respondent’s clinical practice as out of the scope of his training as a psychiatrist. On January 5, 2021, the Department received information regarding Respondent’s care and treatment of Patient K.R., including information of intravenous (IV) therapy. All these matters were eventually docketed under IDFPR Case No. 2019-10129.

On September 13, 2023, the Department filed a Complaint against Respondent's Physician and Surgeon License for the State of Illinois with the following counts: COUNT I, Experimental treatment on non-consenting patients; COUNT II, Care provided to Patient K.R.; COUNT III, Care provided to Patient L.P.; COUNT IV, Care provided to family member, M.R.; COUNT V, Care provided to family member, D.M.; COUNT VI, Care provided to supervised staff; COUNT VII, Treatment of patients with hormones; COUNT VIII, Aiding and abetting unauthorized practice of medicine. See *Exhibit A*, attached hereto and incorporated herein.

The allegations 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), subsections (4), (5), (10), (11), (14), (17), (26), (31), (32), (33), (37), and (41); 68 Ill. Admin. Code 1285.240; 720 ILCS 570/304; and 20 ILCS 2105/2105-130.

Respondent has been advised of the right to accept or reject this Consent Order. Respondent has been advised of the right to a formal hearing 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 Board or the Director of the Division of Professional Regulation of the Department ("Director").

Respondent has knowingly and voluntarily entered into this Consent Order without any threat or coercion by any person. Respondent has not relied on any statements or promises made by or on behalf of the Department other than those specifically set forth in writing herein. Respondent and the Department have agreed, 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 of Financial and Professional Regulation of the State of Illinois, Division of Professional Regulation (“Department”), by and through Daniel Valentín, Staff Attorney, and DONALD ROBERT RADEN, M.D., (“Respondent”), by and through his attorney, Mark Meyer, hereby agree to the following:

- A. Respondent’s Illinois Physician and Surgeon License No. 036.117222 shall be placed on indefinite SUSPENSION for a minimum period of twelve (12) months.
- B. Respondent shall pay a fine of twenty thousand dollars (\$20,000.00). Said fine shall be paid within ninety (90) days of the Director’s signing and approval of this Order. The administrative fee is to be paid by personal check, cashier’s check, or personal money order. Said check shall be made payable to “Illinois Department of Financial and Professional Regulation” and mailed to the following address:
Illinois Dept. of Financial and Professional Regulation
SSC – Accounts Receivable Section – Fines
P.O. Box 7086
Springfield, Illinois 62791-7086
 - 1. In the notation portion of the check, Respondent shall list the above stated case number and Respondent’s license number.
 - 2. If Respondent fails to pay the fine, and the Department is forced to initiate a collection effort to retrieve the administrative fee, Respondent shall be responsible for all costs and fees incurred by the Department in said collection process.
- C. Nothing in this Consent Order relieves Respondent of meeting any additional requirements for restoration set forth in the Illinois Medical Practice Act or any related statutes or rules.
- D. This disposition is considered public discipline for reporting purposes to entities such as the National Practitioner Data Bank.

- E. This Order is a final administrative order. The effective date of this Order is the date when it is signed by the Director unless otherwise stated.

Signatures on following page

8/16/2024

DATE

[Redacted]

Daniel Valentin
Staff Attorney

8/12/24

DATE

[Redacted]

Donald Robert Raden, M.D.,

8/16/24

DATE

[Redacted]

Mark Meyer
Attorney for Respondent

8/28/24

DATE

[Redacted]

Member
Illinois State Medical Board

The foregoing Consent Order is approved in full.

Dated this 4th day of September, 2024.

ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
SECRETARY MARIO TRETO, JR.

[Redacted]

Acting Director Camile Lindsay
Division of Professional Regulation

REF: Case No. 2019-10129
Lic. No. 036.085109



RECEIVED

By Department of Financial and Professional Regulation Clerk of the Court at 9:09 am, Sep 13, 2023

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

DIVISION OF PROFESSIONAL REGULATION)	
OF THE ILLINOIS DEPARTMENT OF FINANCIAL)	
AND PROFESSIONAL REGULATION,)	Complainant,
v.)	
DONALD ROBERT RADEN, M.D.,)	
License No. 036.117225,)	Respondent
)	Case No. 2019-10129

NOTICE OF PRELIMINARY HEARING

To: Donald Robert Raden, M.D.

 via email at 


Michael R. Slovis [Respondent's counsel]
 CUNNINGHAM, MEYER & VEDRINE
 1 East Wacker, Suite 20200
 Chicago, IL 60601
 via email at mslovis@cmvlaw.com

On Monday, 10/23, 2023 at 1:00 p.m. CST, you are directed to appear by telephone before an Administrative Law Judge of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation ("Department"). **Dial (312) 535-8110 and enter the access code of 2461 735 6836 at your scheduled time.** 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. To appear 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 emailed or mailed at least five (5) business days in advance. Your answer and/or any motions should be emailed to FPR.ChiRecords@illinois.gov, or mailed to the **Illinois Department of Financial and Professional Regulation, Division of Professional Regulation, Clerk of the Court, 555 West Monroe Street Suite 500, Chicago, Illinois 60661.**

Failure to file a signed answer may subject you to being held in default. If you are held in default, the Illinois State Medical 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. 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.

ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
SECRETARY MARIO TRETO, JR.


 Daniel Valentin
 Staff Attorney | Medical Prosecutions Unit
 Illinois Department of Financial and Professional Regulation
 555 W. Monroe St., Suite 500
 Chicago, Illinois 60661
 Phone: 312-793-0073 | Email: daniel.valentin@illinois.gov

State of Illinois)
)
County of Cook) Case No. 2019-10129

Under penalties, 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 Complaint to be sent by email pursuant to Department of Professional Regulation Law, 20 ILCS 2105/2105-7, before 5:00 pm CST on the 13th day of September, 2023, to person(s) at the address(es) listed on the attached documents.



Affiant

RECEIVED

By Department of Financial and Professional Regulation Clerk of the Court at 9:09 am, Sep 13, 2023

**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,
)	
)	v.
)	No. 2019-10129
DONALD ROBERT RADEN, M.D.,)	
License No. 036.117225,)	
License No. [REDACTED])	Respondent.

COMPLAINT

NOW COMES THE DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, DIVISION OF PROFESSIONAL REGULATION (“Department”), by its Chief of Medical Prosecutions, Brandon R. Thom, and as its COMPLAINT against DONALD ROBERT RADEN, M.D., (“Respondent”), states as follows:

**COUNT I
(Experimental treatment
on non-consenting patients)**

1. The Department has the power and duty to investigate the conduct of licensees and take disciplinary action in administration and enforcement of the Illinois Medical Practice Act of 1987, 225 ILCS 60/1 *et. seq.* (“Act”), and the Rules adopted by the Department in furtherance of the Act, 68 Ill. Admin. Code § 1285.20, *et seq.*
2. Respondent is the holder of a Certificate of Licensure as a Physician and Surgeon in the State of Illinois, License No. 036.117225, which is currently in “Active” status.
3. Respondent is the holder of a Controlled Substance license in the State of Illinois, License No. [REDACTED] which is currently in “Active” status.

4. The Department has jurisdiction to investigate complaints and to bring this action pursuant to 225 Illinois Compiled Statutes, Section 60/36.
5. At all relevant times herein, Respondent practiced medicine in the State of Illinois as a psychiatrist.
6. At all relevant times herein, Respondent practiced medicine at several medical clinics that he owned located in Lake Bluff, Highwood, and Chicago, within the state of Illinois.
7. On October 17, 2019, the Department received a referral from another state agency noting multiple concerns with Respondent's clinical practice as out of the scope of his training as a psychiatrist.
8. On January 5, 2021, the Department received information regarding Respondent's care and treatment of Patient K.R., including information of intravenous (IV) therapy.
9. Prior to March 2017, Patient L.S., Patient K.R., and Patient C.B., were established psychiatric patients of Respondent. Respondent was treating these patients for various psychiatric conditions with controlled substances.
10. Respondent uses "FAAOT" in his signature as an educational and professional designation to indicate he is a "fellow" from the American Academy of Ozonotherapy ("AAOT").
11. To perform ozone therapy, Respondent uses a device to generate ozone that is not approved or labeled to treat medical conditions; or is adulterated and/or misbranded be used for the treatment of medical conditions.

12. Respondent provide to his patients undergoing IV ozone therapy with a document titled “Informed Consent for the American Academy of Ozonotherapy Sponsored Study of the Safety and Efficacy of Ozone Therapy” (hereafter, “Consent Form”) which states some of the circumstances for which the patient was to receive experimental IV ozone therapy.
13. On or about July 12, 2017, Patient L.S. signed a copy of the Consent Form.
14. On or about October 16, 2017, Patient K.R. signed a copy of the Consent Form.
15. On or about November 10, 2017, Patient C.B. signed a copy of the Consent Form.
16. In the Consent Form, Respondent
- (a) classifies each patient as subject of a medical research;
 - (b) represents himself as a co-investigator of a research approved by the FDA (“Food and Drug Administration”) on the topic of safety and efficacy of ozone therapy;
 - (c) states he is performing research as a fellow and under the approval or supervision of the AAOT and the guidance of a Principle Investigator;
 - (d) classifies his IV treatment with ozone as part of a research program;
 - (e) explains that ozone therapy has additional benefits and is free of serious side effects.
17. The AAOT is not registered as an Institutional Review Board before the FDA, the Office for Human Research Protections, the Department of Health and Human Services (“DHHS”), or other Federal government entity overseeing medical research.
18. Respondent does not possess significant academic or professional experience to conduct, oversee, or participate in human research or provide medical services out of the scope of the psychiatry field.

19. Respondent failed to obtain and/or document obtaining informed consent from Patient L.S., Patient K.R. and Patient C.B. for the IV therapies with ozone.
20. Respondent excessively exposed non-consenting test subjects to severe physical harm and addiction by allowing them to have unmonitored and unrestricted access to IV ports just to provide experimental treatment that he is not qualified or legally authorized to provide.
21. The foregoing acts and/or omissions of Respondent are in violation of, and grounds for revocation, suspension, or other discipline of Respondent's Physician and Surgeon license pursuant to 225 ILCS 60/22(A), subsections (4), (5), (10), (17), (26), (31), (32), (33), (37), and (41); 68 Ill. Admin. Code 1285.240; and 20 ILCS 2105/2105-130.

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, DIVISION OF PROFESSIONAL REGULATION, by Brandon R. Thom, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License of DONALD ROBERT RADEN, M.D., be suspended, revoked, or otherwise disciplined.

COUNT II
(Care provided to Patient K.R.)

- 1-6. The Department hereby adopts and realleges paragraphs 1 through 6 of Count I of this Complaint as paragraphs 1 through 6 of Count II.
7. On January 5, 2021, the Department received information regarding Respondent's care and treatment of Patient K.R.

8. From February 2013 to February 2019, Patient K.R. received continuous psychiatric care from Respondent. The patient's medical records contain about 43 documented clinical encounters or progress notes, excluding the records for the intravenous therapy visits.

7. From February 2013 to February 2019, Respondent issued or authorized prescriptions to Patient K.R. for the following controlled substances:

- a. Alprazolam (brand name: Xanax) a benzodiazepine classified as a Schedule IV controlled substance;
- b. Clonazepam (brand name: Klonopin) a benzodiazepine classified as a Schedule IV controlled substance;
- c. D-Amphetamine Salt Comb (brand name: Adderall) an amphetamine product combination classified as a Schedule II controlled substance;
- d. Diazepam (brand name: Valium) a benzodiazepine classified as a Schedule IV controlled substance;
- e. Eszopiclone (brand name: Lunesta) a sedative-hypnotic classified as a Schedule IV controlled substance;
- f. Methamphetamine (brand name: Desoxyn) a sympathomimetic amine with central nervous system (CNS) stimulant activity classified as a Schedule II controlled substance;
- g. Temazepam (brand name: Restoril) a benzodiazepine classified as a Schedule IV controlled substance;
- h. Lisdexamfetamine (brand name: Vyvanse) an amphetamine product and CNS stimulant classified as a Schedule II controlled substance;
- i. Zolpidem (brand name: Ambien) a sedative-hypnotic classified as a Schedule IV controlled substance.

9. From February 2013 to February 2019, Respondent issued or authorized the following controlled substance prescriptions to Patient K.R in about 127 dates as it follows:

- (a) 2/11/2013 Chloral Hydrate 500mg (Somnote) cap;

- (b) 2/11/2013 Diazepam 5mg tablets;
- (c) 2/12/2013 Xanax 1mg tablets;
- (d) 2/18/2013 D-Amphetamine Salt Combo 20mg tab;
- (e) 2/18/2013 Valium 10mg tablets;
- (f) 3/13/2013 Xanax 2mg tablets;
- (g) 3/15/2013 Methylphenidate 20mg tablets;
- (h) 3/23/2013 Diazepam 10mg tablet;
- (i) 3/27/2013 D-Amphetamine Salt Combo 20mg tab;
- (j) 4/3/2013 Alprazolam 2mg tablets;
- (k) 4/11/2013 Lunesta 3mg tablets;
- (l) 4/29/2013 Alprazolam 2mg tablets;
- (m) 5/3/2013 Lunesta 3mg tablets;
- (n) 5/6/2013 D-Amphetamine Salt Combo 20mg tab;
- (o) 5/28/2013 Alprazolam 2mg tablets;
- (p) 5/28/2013 Lunesta 3mg tablets;
- (q) 5/28/2013 Alprazolam 2mg tablets;
- (r) 6/4/2013 D-Amphetamine Salt Combo 20mg tab;
- (s) 6/24/2013 Lunesta 3mg tablets;
- (t) 7/22/2013 D-Amphetamine Salt Combo 20mg tab;
- (u) 7/22/2013 Alprazolam 2mg tablets;
- (v) 7/22/2013 Lunesta 3mg tablets;
- (w) 7/22/2013 Alprazolam 2mg tablets;
- (x) 7/22/2013 Lunesta 3mg tablets;
- (y) 8/22/2013 D-Amphetamine Salt Combo 20mg tab;
- (z) 9/16/2013 Lunesta 3mg tablets;

(aa)	9/16/2013	Alprazolam 2mg tablets;
(bb)	10/18/2013	Lunesta 3mg tablets;
(cc)	10/18/2013	Alprazolam 2mg tablets;
(dd)	10/20/2013	Lunesta 3mg tablets;
(ee)	10/20/2013	Alprazolam 2mg tablets;
(ff)	10/20/2013	Lunesta 3mg tablets;
(gg)	10/21/2013	D-Amphetamine Salt Combo 20mg tab;
(hh)	11/20/2013	Alprazolam 2mg tablets;
(ii)	11/26/2013	D-Amphetamine Salt Combo 20mg tab;
(jj)	1/7/2014	Alprazolam 2mg tablets;
(kk)	1/16/2014	Lunesta 3mg tablets;
(ll)	2/7/2014	D-Amphetamine Salt Combo 20mg tab;
(mm)	3/6/2014	D-Amphetamine Salt Combo 20mg tab;
(nn)	3/6/2014	Alprazolam 2mg tablets;
(oo)	3/6/2014	Alprazolam 2mg tablets;
(pp)	3/27/2014	Clonazepam 0.5mg tablets;
(qq)	3/31/2014	Alprazolam 2mg tablets;
(rr)	4/15/2014	Zolpidem 5mg tablets;
(ss)	5/12/2014	D-Amphetamine Salt Combo 20mg tab;
(tt)	5/12/2014	Methamphetamine 5mg tablets;
(uu)	5/12/2014	Zolpidem 5mg tablets;
(vv)	5/12/2014	Clonazepam 0.5mg tablets;
(ww)	5/12/2014	Alprazolam 2mg tablets;
(xx)	5/28/2014	Zolpidem 5mg tablets;
(yy)	5/28/2014	Clonazepam 0.5mg tablets;

(zz)	6/10/2014	Alprazolam 2mg tablets;
(aaa)	6/10/2014	Zolpidem 5mg tablets;
(bbb)	6/10/2014	Clonazepam 0.5mg tablets;
(ccc)	6/10/2014	Zolpidem 5mg tablets;
(ddd)	6/10/2014	Alprazolam 2mg tablets;
(eee)	6/10/2014	Clonazepam 0.5mg tablets;
(fff)	6/12/2014	Methamphetamine 5mg tablets;
(ggg)	7/15/2014	Methamphetamine 5mg tablets;
(hhh)	7/15/2014	Eszopiclone 3mg tablets;
(iii)	7/28/2014	Alprazolam 2mg tablets;
(jjj)	7/29/2014	Alprazolam 2mg tablets;
(kkk)	7/29/2014	Alprazolam 2mg tablets;
(lll)	8/4/2014	Methamphetamine 5mg tablets;
(mmm)	8/4/2014	Eszopiclone 3mg tablets;
(nnn)	8/4/2014	Clonazepam 0.5mg tablets;
(ooo)	8/4/2014	Alprazolam 2mg tablets;
(ppp)	8/19/2014	Eszopiclone 3mg tablets;
(qqq)	8/19/2014	Alprazolam 2mg tablets;
(rrr)	8/19/2014	Clonazepam 0.5mg tablets;
(sss)	9/16/2014	Alprazolam 2mg tablets;
(ttt)	9/17/2014	Alprazolam 2mg tablets;
(uuu)	10/7/2014	Methamphetamine 5mg tablets;
(vvv)	10/14/2014	Alprazolam 2mg tablets;
(www)	10/14/2014	Eszopiclone 2mg tablets;
(xxx)	10/27/2014	Methamphetamine 5mg tablets;

(yyy)	10/27/2014	Clonazepam 1mg tablets;
(zzz)	11/11/2014	Eszopiclone 1mg tablets;
(aaaa)	11/17/2014	Clonazepam 0.5mg tablets;
(bbbb)	11/25/2014	Alprazolam 2mg tablets;
(cccc)	11/25/2014	Clonazepam 1mg tablets;
(dddd)	2/15/2015	Vyvanse 50mg capsules;
(eeee)	2/18/2015	Methamphetamine 5mg tablets;
(ffff)	4/14/2015	Methamphetamine 5mg tablets;
(gggg)	4/14/2015	Vyvanse 50mg capsules;
(hhhh)	4/21/2015	Zolpidem ER 6.25mg tablets;
(iiii)	5/6/2015	Vyvanse 70mg capsules;
(jjjj)	5/11/2015	Zolpidem 10mg tablets;
(kkkk)	6/8/2015	Vyvanse 70mg capsules;
(llll)	6/8/2015	Zolpidem 10mg tablets;
(mmmm)	7/10/2015	Zolpidem 10mg tablets;
(nnnn)	7/29/2015	Vyvanse 70mg capsules;
(oooo)	8/6/2015	D-Amphetamine Salt Combo 15mg tabs;
(pppp)	8/6/2015	Vyvanse 50mg capsules;
(qqqq)	8/6/2015	Zolpidem 10mg tablets;
(rrrr)	9/15/2015	Vyvanse 50mg capsules;
(ssss)	9/25/2015	Methamphetamine 5mg tablets;
(tttt)	9/25/2015	Alprazolam 0.5mg tablets;
(uuuu)	10/22/2015	Vyvanse 50mg capsules;
(vvvv)	10/22/2015	Clonazepam 0.5mg tablets;
(wwww)	10/22/2015	Clonazepam 0.5mg tablets;

(xxxx)	11/3/2015	Alprazolam ER 1mg tablets;
(yyyy)	11/6/2015	Clonazepam 1mg tablets;
(zzzz)	12/1/2015	Clonazepam 1mg tablets;
(aaaa)	12/1/2015	Alprazolam ER 2mg tablets;
(bbbb)	12/21/2015	Vyvanse 70mg capsules;
(cccc)	12/21/2015	D-Amphetamine Salt Combo 30mg tab;
(dddd)	12/23/2015	Clonazepam 1mg tablets;
(eeee)	12/23/2015	Alprazolam 2mg tablets;
(ffff)	12/23/2015	Alprazolam 2mg tablets;
(gggg)	12/28/2015	Alprazolam ER 2mg tablets;
(hhhh)	1/15/2016	Vyvanse 70mg capsules;
(iiii)	1/15/2016	Alprazolam 2mg tablets;
(jjjj)	1/15/2016	Clonazepam 1mg tablets;
(kkkk)	1/19/2016	Alprazolam ER 2mg tablets;
(llll)	1/19/2016	Alprazolam ER 2mg tablets;
(mmmm)	1/19/2016	Alprazolam ER 2mg tablets;
(nnnn)	2/1/2016	Methamphetamine 5mg tablets;
(oooo)	2/1/2016	Alprazolam ER 2mg tablets;
(pppp)	2/23/2016	Clonazepam 1mg tablets;
(qqqq)	3/8/2016	Vyvanse 70mg capsules;
(rrrr)	3/11/2016	Alprazolam 2mg tablets;
(ssss)	3/11/2016	Alprazolam 2mg tablets;
(tttt)	3/17/2016	Clonazepam 1mg tablets;
(uuuu)	3/17/2016	Alprazolam ER 2mg tablets;
(vvvv)	3/17/2016	Clonazepam 1mg tablets;

(wwwww)	3/17/2016	Alprazolam ER 2mg tablets;
(xxxxx)	4/1/2016	Alprazolam ER 2mg tablets;
(yyyyy)	4/15/2016	Methylphenidate 20mg tablets;
(zzzzz)	4/15/2016	Clonazepam 1mg tablets;
(aaaaa)	4/15/2016	Alprazolam ER 2mg tablets;
(bbbbb)	4/15/2016	Clonazepam 1mg tablets;
(ccccc)	4/24/2016	Clonazepam 2mg tablets;
(ddddd)	6/9/2016	Clonazepam 2mg tablets;
(eeeee)	6/9/2016	Clonazepam 2mg tablets;
(fffff)	6/15/2016	Methamphetamine 5mg tablets;
(ggggg)	8/4/2016	Clonazepam 2mg tablets;
(hhhhh)	8/4/2016	Clonazepam 2mg tablets;
(iiiiii)	8/25/2016	Zolpidem 10mg tablets;
(jjjjj)	9/12/2016	Alprazolam ER 2mg tablets;
(kkkkk)	9/12/2016	Clonazepam 2mg tablets;
(lllll)	9/12/2016	Zolpidem 10mg tablets;
(mmmmm)	9/12/2016	Clonazepam 2mg tablets;
(nnnnn)	9/30/2016	Alprazolam ER 2mg tablets;
(ooooo)	9/30/2016	Zolpidem 10mg tablets;
(ppppp)	10/7/2016	Clonazepam 2mg tablets;
(qqqqq)	10/7/2016	Zolpidem 10mg tablets;
(rrrrr)	10/7/2016	Zolpidem 10mg tablets;
(sssss)	10/7/2016	Clonazepam 2mg tablets;
(ttttt)	10/7/2016	Clonazepam 2mg tablets;
(uuuuu)	11/1/2016	Alprazolam ER 2mg tablets;

(vvvvvv)	11/1/2016	Alprazolam ER 2mg tablets;
(wwwwww)	11/1/2016	Alprazolam ER 2mg tablets;
(xxxxxx)	12/5/2016	Alprazolam ER 2mg tablets;
(yyyyyy)	12/5/2016	Temazepam 30mg capsules;
(zzzzzz)	12/20/2016	Zolpidem 10mg tablets;
(aaaaaa)	12/23/2016	Clonazepam 2mg tablets;
(bbbbbb)	12/23/2016	Zolpidem 10mg tablets;;
(cccccc)	12/23/2016	Clonazepam 2mg tablets
(dddddd)	2/12/2017	Zolpidem 10mg tablets;
(eeeeee)	2/15/2017	Alprazolam ER 2mg tablets;
(ffffff)	2/15/2017	Zolpidem 10mg tablets;
(gggggg)	3/5/2017	Alprazolam ER 2mg tablets;
(hhhhhh)	3/15/2017	Clonazepam 2mg tablets;
(iiiiii)	3/15/2017	Clonazepam 2mg tablets;
(jjjjjj)	3/20/2017	Alprazolam ER 2mg tablets;
(kkkkkk)	3/20/2017	Alprazolam ER 2mg tablets;
(llllll)	3/28/2017	Alprazolam ER 2mg tablets;
(mmmmmm)	4/14/2017	Zolpidem 10mg tablets;
(nnnnnn)	4/18/2017	Zolpidem 10mg tablets;
(oooooo)	5/15/2017	Zolpidem 10mg tablets;
(pppppp)	5/15/2017	Zolpidem 10mg tablets;
(qqqqqq)	5/15/2017	Zolpidem 10mg tablets;
(rrrrrr)	5/18/2017	Clonazepam 2mg tablets;
(ssssss)	5/18/2017	Clonazepam 2mg tablets;
(tttttt)	6/29/2017	Alprazolam ER 2mg tablets;

(uuuuuuu)	6/29/2017	Alprazolam ER 2mg tablets;
(vvvvvvv)	7/12/2017	Clonazepam 2mg tablets;
(wwwwwww)	8/9/2017	Zolpidem 10mg tablets;
(xxxxxxx)	8/9/2017	Clonazepam 2mg tablets;
(yyyyyyy)	8/9/2017	Alprazolam ER 2mg tablets;
(zzzzzzz)	8/9/2017	Clonazepam 2mg tablets;
(aaaaaaaa)	8/9/2017	Zolpidem 10mg tablets;
(bbbbbbbb)	8/29/2017	Alprazolam ER 2mg tablets;
(ccccccc)	8/29/2017	Alprazolam ER 2mg tablets;
(ddddddd)	10/5/2017	Alprazolam ER 2mg tablets;
(eeeeeee)	10/5/2017	Zolpidem 10mg tablets;
(fffffft)	10/5/2017	Clonazepam 2mg tablets;
(ggggggg)	10/5/2017	Clonazepam 2mg tablets;
(hhhhhhh)	10/5/2017	Zolpidem 10mg tablets;
(iiiiiii)	10/5/2017	Alprazolam ER 2mg tablets;
(jjjjjjj)	11/4/2017	Methamphetamine 5mg tablets;
(kkkkkkk)	12/11/2017	Zolpidem 10mg tablets;
(lllllll)	12/12/2017	Clonazepam 2mg tablets;
(mmmmmmm)	1/5/2018	Alprazolam 1mg tablets;
(nnnnnnn)	1/16/2018	Alprazolam ER 2mg tablets;
(ooooooo)	1/18/2018	Alprazolam ER 2mg tablets;
(ppppppp)	1/18/2018	Alprazolam ER 2mg tablets;
(qqqqqqq)	1/18/2018	Alprazolam ER 2mg tablets;
(rrrrrrr)	1/26/2018	Zolpidem 10mg tablets;
(sssssss)	1/26/2018	Zolpidem 10mg tablets;

(ttttttt)	1/26/2018	Zolpidem 10mg tablets;
(uuuuuuuu)	2/5/2018	Alprazolam ER 2mg tablets;
(vvvvvvvv)	2/5/2018	Alprazolam 2mg tablets;
(wwwwwww)	3/16/2018	Alprazolam 2mg tablets;
(xxxxxxx)	3/16/2018	Alprazolam 2mg tablets;
(yyyyyyyy)	3/29/2018	Zolpidem 10mg tablets;
(zzzzzzzz)	3/29/2018	Zolpidem 10mg tablets;
(aaaaaaaa)	3/29/2018	Zolpidem 10mg tablets;
(bbbbbbbbb)	5/30/2018	Alprazolam ER 2mg tablets;
(cccccccc)	5/30/2018	Alprazolam ER 2mg tablets;
(dddddddd)	5/30/2018	Alprazolam ER 2mg tablets;
(eeeeeeee)	6/4/2018	Alprazolam 2mg tablets;
(fffffftt)	6/5/2018	Alprazolam 2mg tablets;
(gggggggg)	6/6/2018	Alprazolam ER 0.5mg tablets;
(hhhhhhhh)	6/6/2018	Alprazolam ER 0.5mg tablets;
(iiiiiiii)	6/20/2018	Alprazolam ER 1mg tablets;
(jjjjjjjj)	6/22/2018	Methamphetamine 5mg tablets;
(kkkkkkkk)	7/30/2018	Zolpidem 10mg tablets;
(llllllll)	8/28/2018	Alprazolam 2mg tablets;
(mmmmmmmm)	8/28/2018	Zolpidem 10mg tablets;
(nnnnnnnn)	9/11/2018	Alprazolam ER 2mg tablets;
(oooooooo)	9/11/2018	Alprazolam ER 2mg tablets;
(pppppppp)	9/27/2018	Zolpidem 10mg tablets;
(qqqqqqqq)	10/12/2018	Methamphetamine 5mg tablets;
(rrrrrrrr)	10/12/2018	Alprazolam 2mg tablets;

(ssssssss)	10/12/2018	Alprazolam ER 2mg tablets;
(tttttttt)	10/12/2018	Zolpidem 10mg tablets;
(uuuuuuuu)	11/6/2018	Alprazolam ER 2mg tablets;
(vvvvvvvv)	11/6/2018	Alprazolam 2mg tablets;
(wwwwwww)	11/6/2018	Alprazolam ER 0.5mg tablets;
(xxxxxxxx)	11/26/2018	Zolpidem 10mg tablets;
(yyyyyyyy)	12/24/2018	Methamphetamine 5mg tablets;
(zzzzzzzz)	12/24/2018	Zolpidem 10mg tablets;
(aaaaaaaa)	12/24/2018	Alprazolam 2mg tablets;
(bbbbbbbb)	12/24/2018	Zolpidem 10mg tablets;
(cccccccc)	1/15/2019	Alprazolam ER 0.5mg tablets;
(dddddddd)	1/15/2019	Alprazolam ER 2mg tablets;
(eeeeeeee)	1/21/2019	Alprazolam 2mg tablets.

10. On or about February 11, 2013, Patient K.R., who was 25-year-old at the time, first saw Respondent at his clinical facility located in Lake Bluff, Illinois. At this clinical encounter, Respondent noted in the medical records his concerns with the patient current high doses of medication and her known history of cocaine and heroin addiction.

11. On or about September 19, 2013, the Northbrook Police Department arrested Patient K.R. after she had a car accident while driving under the influence of Alprazolam and other prescription drugs.

12. On or about September 30, 2013, Patient K.R. was charged before the Second Municipal District of the Circuit Court of Cook County with driving under the influence (DUI) of

controlled substances in violation of 625 ILCS 5/11-501(a), subsections (4) and (6). The charges were unrelated to drunk driving, alcohol use, or illegal drug possession.

13. On or about August 29, 2014, Patient K.R. pled guilty to the referenced DUI charges, and the District of the Circuit Court of Cook County sentenced the patient to two (2) years of conditional discharge subject to the successful completion of a drug rehabilitation program.
14. On or about February 18, 2015, Respondent prescribed Methamphetamine to Patient K.R. after remarking that she did a “wonderful job” upon the patient finishing a detoxification and rehabilitation program that were focused in addressing the patient’s substance abuse disorder.
15. From May 2015 to April 2016, Patient K.R. resided and worked in the State of Colorado.
16. From May 2015 to April 2016, Respondent treated Patient K.R. without meeting the patient in person or referring the patient to a qualified mental healthcare provider that is licensed to practice in the State of Colorado.
17. From May 2015 to April 2016, Respondent issued or authorized about 46 prescriptions to Patient K.R., including about 24 controlled substance prescriptions, that were filled in the State of Colorado.
18. From May 2015 to April 2016, Respondent issued or authorized about 8 prescriptions to Patient K.R. that were filled in the State of Tennessee.

19. From May 2015 to April 2016, Respondent was not licensed to practice medicine in the State of Tennessee, and his Colorado Physician License DR.0043075 was in "Expired" status.
20. On or about August 19, 2016, Patient K.R. conditional discharge was terminated by the Second District of the Circuit Court of Cook County. At the time she was taking more prescription Alprazolam than before the DUI arrest and subsequent rehabilitation program.
21. On or about April 3, 2017, Respondent contacted Patient K.R. via text message to inform her that after a conference, he believed her therapeutic answer was IV therapy. Respondent did not document this clinical encounter or clinical criteria for recommending IV therapy.
22. On or about April 11, 2017, Respondent enrolled Patient K.R. to start ozone therapy "in roughly two weeks." No informed consent form was documented at the time, nor a discernible clinical criteria or treatment plan for IV ozone therapy.
23. Shortly after April 11, 2017, Respondent either ordered or referred Patient K.R. to another provider to undergo a PICC line placement and instructed the patient to start antibiotics in anticipation for IV therapy. Respondent did not document the circumstances behind the referenced PICC line placement.
24. A PICC line is a thin tube that is inserted in the patient through a vein in the arm and passed through to the larger veins near the patient's heart.
25. By December 4, 2017, Patient K.R. had a right subclavian port implanted ("SC port") at Respondent's request so the patient could continue with the IV therapies. There is no documentation of this clinical encounter, or any progress note explaining when the prior

PICC line was removed, when this SC Port was placed in the patient or by whom and under which circumstances, and what measures Respondent had in place to ensure patient safety. No risk/benefit assessment or effective controls to protect this patient with a history of substance abuse from misusing these IV devices were documented.

26. A SC Port is an implanted device that allows repeated access to the subclavian vein.

27. A SC Port is reserved for medical treatments such as chemotherapy, blood transfusions, and hemodialysis.

28. Only board-certified and specifically trained physicians, such as palliative care physicians, hematologists, oncologists, intensivists, or emergency physicians, are properly skilled and qualified to provide treatment through an SC Port or PICC line, and to supervise adequately trained healthcare staff with access these devices.

29. Patients with a history of addiction or substance abuse may improperly misuse a PICC line or an SC Port to abuse from substances by injecting them directly.

30. On or about December 4, 2017, Respondent ordered Patient K.R. to request an SC Port study because the port was not functioning. There is no documentation of this clinical encounter and the reasons for requesting exploration.

31. On or about March 3, 2018, Respondent ordered Patient K.R. to request another SC Port study. There is no documentation of this clinical encounter and the reasons for requesting exploration of the SC Port.

32. On or about April 2, 2018, Respondent first documented an IV therapy for Patient K.R. No physical examination, symptoms, chief complains, or treatment plans were documented in this or any other clinical encounter for the patient's IV records.
33. On February 24, 2019, Patient K.R. died. The cause of death was probable cardiac arrhythmia. The manner of death was natural. Patient K.R. was 31 years old.
34. Physicians cannot assume responsibility for delivery of patient care that the physician is not properly qualified or competent to render. 68 Ill. Admin. Code 1285.240(a)(1)(B).
35. Respondent deviated from the accepted standards of care, ethics, and professionalism in his treatment of Patient K.R.
- a. Respondent did not possess the required training, skills, and qualifications to treat and diagnose the non-psychiatric conditions of this patient with reasonable competency, skill, safety, and efficacy.
 - b. Respondent did not possess the required training, skills, and qualifications to treat and diagnose Patient K.R. drug addiction and substance abuse disorder.
 - c. Respondent failed to treat and diagnose Patient K.R. with the reasonable care, skill, or knowledge that would ordinarily use under similar circumstances by a psychiatrist.
 - d. Respondent used his Illinois prescribing privileges and the corresponding DEA Registration to expose Patient K.R. and the people of Colorado to the risks of unlicensed medical practice and unauthorized controlled substance prescriptions.
 - e. Respondent failed to create or maintain timely, legible, accurate, and complete medical records of the psychiatric care and the IV therapies he provided to Patient K.R.
 - f. Respondent provided psychiatric care to Patient K.R. without documenting accurate clinical encounters, a clinical rationale for treatment and diagnosis, controlled substance prescriptions, proper psychiatric assessment, diagnostic mental status

examination, neurologic examination, a DSM5 differential diagnosis, a discernible treatment plan with therapeutical objectives, or an assessment of the patient's potential for self-harm or harm to others.

- g. Respondent provided experimental IV treatment to Patient K.R. without documenting accurate clinical encounters, accurate information of IV therapies, health complications, reference to IV port studies, copies of referrals and laboratory orders, reasons for referrals and laboratory orders, reasons for the patient to undergo PICC Line and SC Port placement, date or circumstances behind SC Port placement surgery, incidents of infection at the PICC line and SC Port sites, names and qualifications of the healthcare staff providing blood transfusion, blood product compounding information, substance compounding information, qualifications and methods of storing the compounds made at the IV clinic, medical research notes, or reasoning behind treatment with a substance that the US Food and Drug Administration ("FDA") prohibits for medical use.

36. A prescription for a controlled substance to be effective must be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his or her professional practice. The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner. 21 CFR 1306.04; 77 Ill. Admin. Code 3100.380(a).

37. A prescription may not be issued for the dispensing of narcotic drugs listed in any Schedule to a narcotic drug dependent person for the purpose of continuing his or her dependence upon such drugs. 77 Ill. Admin. Code 3100.380(b).

38. Pursuant to Section 304 of the Illinois Controlled Substance Act ("CSA"), controlled substance prescribers are responsible for providing effective controls against the diversion of controlled substances. 720 ILCS 570/304.

39. As a measure against the diversion of controlled substances, prescribers are responsible of carefully monitoring patients for:

- a. physical dependence;
- b. severe withdrawal symptoms;
- c. substance abuse disorder and addiction;
- d. signs, symptoms, and aberrant behaviors suggestive of abuse, addiction, misuse, and diversion.

40. Respondent's care of Patient K.R. with controlled substances deviated from applicable legal standards and medically accepted therapeutic purposes:

- a. Through the course of care, Respondent treated Patient K.R. without a controlled substance treatment agreement, prescription monitoring, ordering drug screens, monitoring for aberrant behaviors, referring the patient to an addiction specialist, or providing effective controls against abuse, addiction, misuse, or diversion of controlled substances.
- b. Through the course of care, Respondent overprescribed controlled substances to Patient K.R. without a medically acceptable therapeutic purpose and in a manner that was not clinically indicated by the patient history, symptoms, or diagnostic tests.
- c. Through the course of care, Respondent prescribed controlled substances to a narcotic drug dependent person for the purpose of continuing her dependence upon such drugs.
- d. Respondent ignored, disregarded, or failed to recognize Patient K.R.'s signs and aberrant behaviors indicative of dependence, withdrawal, and addiction. Respondent also ignored other providers that communicated their concerns with the patient's drug-seeking behavior, the controlled substance treatment, and IV therapies.
- e. Respondent failed to create or maintain timely, legible, accurate, and complete medical records of the controlled substances he prescribed to Patient K.R.

- f. Respondent's prescription practices materially contributed to Patient K.R.'s intoxication that led to her arrested for a substance-related DUI on 9/19/2013.
- g. Respondent restarted Patient K.R. on controlled substances after she completed a rehabilitation without consulting the rehabilitation program, referring the patient to an addiction specialist, consulting the case with an addiction specialist, or providing a clinical rationale for prescribing controlled substances.
- h. Respondent treated Patient K.R. while she resided and worked in the State of Colorado from May 2015 to April 2016 without having an active medical license in that state and without referring the patient to licensed healthcare provider.
- i. Respondent's unlicensed practice and failure to refer Patient K.R. to Colorado stopped the patient from connecting with a qualified local provider that could disrupt the patient's dependence to the substances Respondent was prescribing.
- j. The inappropriate text messages and personal relationship between Respondent and Patient K.R. further impacted his medical judgment and enabled the patient to seek more controlled substances from him on demand.
- k. Respondent exposed Patient K.R. to severe physical harm and addiction by allowing granting her unmonitored and unrestricted access to her bloodstream through a PICC Line and SC Port that he ordered to treat the patient intravenously with a medical procedure that the patient did not consent and Respondent is unqualified to provide or supervise.

41. The foregoing acts and/or omissions of Respondent are in violation of, and grounds for revocation, suspension, or other discipline of Respondent's Physician and Surgeon license pursuant to 225 ILCS 60/22(A); subsections (4), (5), (10), (17), (26), (31), (32), (33), (37), and (41); 68 Ill. Admin. Code 1285.240; 720 ILCS 570/304; and 20 ILCS 2105/2105-130.

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, DIVISION OF PROFESSIONAL REGULATION, by Brandon R. Thom, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License of DONALD ROBERT RADEN, M.D., be suspended, revoked, or otherwise disciplined.

COUNT III
(Care provided to Patient L.P.)

1-6. The Department hereby adopts and realleges paragraphs 1 through 6 of Count I of this Complaint as paragraphs 1 through 6 of Count III.

1. On January 26, 2021, the Department received information regarding Respondent's care and treatment of a minor, Patient L.P.
2. From October 2014 to October 2020, Patient L.P. received continuous psychiatric care from Respondent. The patient's medical records contain about 29 documented progress notes. The patient did not receive IV therapy.
3. On or about January 19, 2021, Patient L.P. presented at Lurie Childrens Hospitals after his parents were concerned with Respondent's treatment and/or diagnosis of memory fog, mold mitigation, and auto-immune encephalitis.
4. Physicians cannot assume responsibility for delivery of patient care that the physician is not properly qualified or competent to render. 68 Ill. Admin. Code 1285.240(a)(1)(B).
5. Respondent deviated from the accepted standards of care, ethics, and professionalism in his treatment of Patient L.P. for the following reasons:

- (a) Respondent provided psychiatric treatment and nutritional care to a developing child for about 6 years while only seeing the patient in person once.
 - (b) Respondent did not possess the required training, skills, and qualifications to treat and diagnose non-psychiatric conditions with reasonable competency, skill, safety, and efficacy.
 - (c) Respondent did not possess the required training, skills, and qualifications to provide nutritional guidance or primary care with reasonable competency, skill, safety, and efficacy.
 - (d) Respondent's medical records for the patient does not contain primary forms and/or adequate documentation of medical history, family medical history, social history, medication history, and treatment plans established by other physicians. Language disorder diagnosis suggested a special education or special needs child, a situation that Respondent did not follow-up correctly.
 - (e) There is no adequate documentation of clinical encounters. Medications were not properly reconciled in the medical records as well. Multiple providers appeared to have provided treatment or prescriptions, and the records do not properly reflect who saw the patient at Respondent's clinic. There is also lack of documented informed consent and assent from the patient and parents/guardians for psychiatric treatment of an infant and child.
 - (f) Respondent provided no discernible or acceptable clinical rationale for diagnosing and continuously treating the patient for a psychiatric condition.
6. The foregoing acts and/or omissions of Respondent are in violation of, and grounds for revocation, suspension, or other discipline of Respondent's Physician and Surgeon license pursuant to 225 ILCS 60/22(A); subsections (5), (10), (17), (26), (31), (33), (37), and (41); 68 Ill. Admin. Code 1285.240; 720 ILCS 570/304; and 20 ILCS 2105/2105-130.

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, DIVISION OF PROFESSIONAL

REGULATION, by Brandon R. Thom, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License of DONALD ROBERT RADEN, M.D., be suspended, revoked, or otherwise disciplined.

COUNT IV
(Care provided to a family member, M.R.)

- 1-6. The Department hereby adopts and realleges paragraphs 1 through 6 of Count I of this Complaint as paragraphs 1 through 6 of Count IV.
7. At all times relevant herein, Patient M.R. was Respondent's wife.
8. From February 2015 to June 2022, Respondent issued or authorized prescriptions to M.R. for non-controlled medications and Clonazepam (brand name: Klonopin), a benzodiazepine classified as a Schedule IV controlled substance.
9. Respondent issued the referenced prescriptions to Patient M.R., without creating or keeping medical records during the usual course of his professional practice at his place of medical practice.
10. The foregoing acts and/or omissions of Respondent are in violation of, and grounds for revocation, suspension, or other discipline of Respondent's Physician and Surgeon license pursuant to 225 ILCS 60/22(A); subsections (5), (26), (37) and (41); 68 Ill. Admin. Code 1285.240; 720 ILCS 570/304; and 20 ILCS 2105/2105-130.

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, DIVISION OF PROFESSIONAL REGULATION, by Brandon R. Thom, its Chief of Medical Prosecutions, prays that the Illinois

Physician and Surgeon License of DONALD ROBERT RADEN, M.D., be suspended, revoked, or otherwise disciplined.

COUNT V
(Care provided to a family member, D.M.)

- 1-6. The Department hereby adopts and realleges paragraphs 1 through 6 of Count I of this Complaint as paragraphs 1 through 6 of Count V.
7. At all times relevant herein, Patient D.M. was Respondent's [REDACTED]
8. At all times relevant herein, Patient D.M. was [REDACTED]
9. At all times relevant herein, Mara Raden had authorized access to patient files from Respondent as the co-owner or manager of Respondent's clinics.
10. At all times relevant herein, Respondent supervised Dr. Melissa Musec, who worked for him at his clinic.
11. From November 2013 to October 2022, Respondent issued or authorized prescriptions to D.M. for non-controlled medications and Alprazolam (brand name: Xanax), a benzodiazepine classified as a Schedule IV controlled substance.
12. From June 2022 to February 2023, Dr. Melissa Musec issued or authorized prescriptions to D.M. for non-controlled medications, and for Alprazolam and Clonazepam (brand name: Klonopin), both classified as a Schedule IV controlled substances.
13. Some of these controlled substance prescriptions issued by Dr. Musec were sent and filled in the states of New York and Florida.

14. Dr. Musec was not licensed to practice medicine or authorized to prescribe controlled substances in the states of New York or Florida at all times relevant herein.

15. The foregoing acts and/or omissions of Respondent are in violation of, and grounds for revocation, suspension, or other discipline of Respondent's Physician and Surgeon license pursuant to 225 ILCS 60/22(A); subsections (5), (26), (37) and (41); 68 Ill. Admin. Code 1285.240; 720 ILCS 570/304; and 20 ILCS 2105/2105-130.

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, DIVISION OF PROFESSIONAL REGULATION, by Brandon R. Thom, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License of DONALD ROBERT RADEN, M.D., be suspended, revoked, or otherwise disciplined.

COUNT VI
(Care provided to supervised staff)

1-6. The Department hereby adopts and realleges paragraphs 1 through 6 of Count I of this Complaint as paragraphs 1 through 6 of Count VI.

7. At all times relevant herein, Patient L.O. was a [REDACTED] that worked for Respondent at one or more of Respondent's clinics.

8. From March 2019 to October 2021, Respondent issued or authorized prescriptions to L.O. various for non-controlled medications and D-Amphetamine salt combo (brand name: Adderall), a stimulant classified as a Schedule II controlled substance.

9. The foregoing acts and/or omissions of Respondent are in violation of, and grounds for revocation, suspension, or other discipline of Respondent's Physician and Surgeon license

pursuant to 225 ILCS 60/22(A); subsections (5), (26), (37) and (41); 68 Ill. Admin. Code 1285.240; 720 ILCS 570/304; and 20 ILCS 2105/2105-130.

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, DIVISION OF PROFESSIONAL REGULATION, by Brandon R. Thom, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License of DONALD ROBERT RADEN, M.D., be suspended, revoked, or otherwise disciplined.

COUNT VII
(Treatment of patients with hormones)

- 1-6. The Department hereby adopts and realleges paragraphs 1 through 6 of Count I of this Complaint as paragraphs 1 through 6 of Count VII.
7. From 2020 to 2022, Respondent prescribed testosterone to Patient J.K., Patient Z.S., and Patient M.W.
8. Respondent is not a board-certified or trained endocrinologist.
9. Respondent is not qualified to prescribe hormones or provide treatment with hormones as a board-certified psychiatrist.
10. A physician cannot assume responsibility for delivery of patient care that the physician is not properly qualified or competent to render. 68 Ill. Admin. Code 1285.240(a)(1)(B).
11. The foregoing acts and/or omissions of Respondent are in violation of, and grounds for revocation, suspension, or other discipline of Respondent's Physician and Surgeon license

pursuant to 225 ILCS 60/22(A); subsections (4) and (5), 68 Ill. Admin. Code 1285.240; and 20 ILCS 2105/2105-130.

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, DIVISION OF PROFESSIONAL REGULATION, by Brandon R. Thom, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License of DONALD ROBERT RADEN, M.D., be suspended, revoked, or otherwise disciplined.

COUNT VIII
(Aiding and abetting unauthorized practice of medicine)

- 1-6. The Department hereby adopts and realleges paragraphs 1 through 6 of Count I of this Complaint as paragraphs 1 through 6 of Count VIII.
7. Respondent has registered before the Illinois Secretary of State various business entities with the purpose of providing medical services in the State of Illinois, including experimental treatment with IV therapies.
8. Mara Raden is registered as the manager, or has otherwise acted like a manager, director, owner, or co-owner of various of the business entities or clinics in which Respondent provides medical services.
9. Mara Raden publicly identifies as the Medical Director and co-owner of Respondent's clinics.
10. Medical Director is a commonly known as a leadership and management position within a clinical setting or hospital that is solely reserved for licensed physicians.

11. Mara Ivy Mahler (a.k.a. Mara Raden) is a non-physician pharmacist who is not licensed to practice medicine or prescribe drugs in the State of Illinois.
12. Respondent aided and abetted Mara Raden, Raden Wellness, and/or other unauthorized business entities in the unlicensed practice of a profession regulated under the Medical Practice Act.
13. As a licensed physician, Respondent has a legal duty to ensure that this his clinics meet the applicable licensing, credentialing, and legal requirements of the Department, the Office of the Secretary of State, the Medical Practice Act of 1987, the Business Corporation Act of 1983, and the Medical Corporation Act.
14. The foregoing acts and/or omissions of Respondent are in violation of, and grounds for revocation, suspension, or other discipline of Respondent's Physician and Surgeon license pursuant to 225 ILCS 60/22(A); subsections (5), (11), (14), (26), (31), and (32); 68 Ill. Admin. Code 1285.240; and 20 ILCS 2105/2105-130.

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, DIVISION OF PROFESSIONAL REGULATION, by Brandon R. Thom, its Chief of Medical Prosecutions, prays that the Illinois Physician and Surgeon License of DONALD ROBERT RADEN, M.D., be suspended, revoked, or otherwise disciplined.

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
SECRETARY MARIO TRETO, JR.



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