

STATE OF ILLINOIS

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION

Department of Financial and Professional Regulation)	
of the State of Illinois,)	
v.)	No. 2001-075511
)	2001-075512
Christ Pete Koulis)	
License No. 036-087150)	
C.S. License No. 336-049120,)	
)	Respondent

COMPLAINT

Now comes the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by its Chief of Medical Prosecutions of the Division of Professional Regulation, Sadzi Oliva, and as its COMPLAINT against Christ Pete Koulis, Respondent, complains as follows:

COUNT I

1. Christ Pete Koulis is presently the holder of a Certificate of Registration as a Physician and Surgeon in the State of Illinois, License No. 036-087150, issued by the Department of Professional Regulation of the State of Illinois. Said license is presently in active status.
2. Respondent is also the holder of Controlled Substances Registration No. 336-049120, which is presently in active status.
3. At all times relevant to this complaint, Christ Pete Koulis was licensed as a physician and surgeon and is engaged in the practice of medicine in Illinois.
4. That on or about September 3, 2002, Respondent was indicted on the following counts

in Boone County, Kentucky:

- a. Three counts Trafficking in a Controlled Substance in the First Degree, Class C Felony
 - b. Three counts Trafficking in a Controlled Substance in the Second Degree, Class D Felony
 - c. One count Wanton Endangerment in the Second Degree, Class A Misdemeanor
 - d. Four counts Unlawful prescribing, Dispensing, administering or Distributing a Controlled Substance, Class D Felony.
 - e. Six counts Unlawful dispensing of a Legend Drug, Class A Misdemeanor
 - f. Two counts Possession of Prescription Drugs Not in Original Container, Class B Misdemeanor.
5. That on or about December 10, 2003, Respondent entered a plea of guilty to one count of Unlawfully Dispensing, Administering, or Distributing a Controlled Substance. A copy of the Judgment of Guilty is attached as Exhibit A.
 6. That pursuant to a plea agreement, Respondent was sentenced to 5 years pretrial Diversion and other conditions.
 7. That Respondent has entered a plea of guilty to a felony charge.
 8. These actions or omissions as alleged are grounds for revocation, suspension, or other discipline to a Certificate of Registration pursuant to 225 ILCS 60 /22 (A)(3).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by Sadzi Oliva, its

Chief of Medical Prosecution of the Division of Professional Regulation, prays that the Physician and Surgeon and Controlled Substances licenses of Christ Pete Koulis be suspended or otherwise disciplined.

COUNT II

1. The Department hereby re-alleges paragraphs 1 – 7 of Count I as paragraphs 1 - 7 of Count II.
8. That Respondent failed to report the Department an adverse action taken against him by the State of Kentucky for actions directly related to the practice of medicine.
9. That in or about June, 2005, checked 'no' in response to the following question

Since July 31, 2002, have you been convicted of any criminal offense in any state or federal court?

A copy of Respondent's renewal application is attached as Exhibit B.

10. These actions or omissions as alleged are grounds for revocation, suspension, or other discipline to a Certificate of Registration pursuant to 225 ILCS 60 /22 (A)(34).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by Sadzi Oliva, its Chief of Medical Prosecution of the Division of Professional Regulation, prays that the Physician and Surgeon and Controlled Substances licenses of Christ Pete Koulis be suspended or otherwise disciplined.

COUNT III

1. The Department hereby re-alleges paragraphs 1 – 3 of Count I as paragraphs 1 - 3 of Count II.
4. That on or about July 2, 2002, Respondent entered into a Consent Order with the Department in this case. A copy of the July 2002 Consent Order is attached as Exhibit C.
5. That the allegations listed in the Consent Order indicate that his clinical privileges were suspended after he entered into a romantic relationship with two patients.
6. That the terms of the Consent Order approved July 2, 2002 placed the Respondent's license on indefinite suspension.
7. That on or about July 16, 2003, Respondent filed a Petition for Restoration.
8. That the Respondent subsequently entered into another Consent Order with the Department to restore his license. The second Consent Order was approved by the Director on December 11, 2003 and is attached as exhibit D.
9. That paragraph A (8) states as follows:

During the term of Probation, Petitioner is prohibited from working in a solo practice and is prohibited from seeing patients without another physician present in the office.
10. That as of August 19, 2005, Respondent was employed as a physician at Physicians Care Ltd in Arlington Heights, IL.
11. That on or about August 19, 2005, Respondent saw and treated patients at his office in Arlington Heights without another physician in the office.
12. That Respondent has violated the terms and conditions of his Probation.

13. These actions as alleged are grounds for revocation, suspension, or other discipline to a Certificate of Registration pursuant to 225 ILCS 60 /22 (A)(15).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by Sadzi Oliva, its Chief of Medical Prosecution of the Division of Professional Regulation, prays that the Physician and Surgeon and Controlled Substances licenses of Christ Pete Koulis be suspended or otherwise disciplined.

DEPARTMENT OF FINANCIAL AND PROFESSIONAL
REGULATION of the State of Illinois

BY: 

Sadzi Oliva

CHIEF OF MEDICAL PROSECUTIONS

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