



Sohail Mosaaddegh, Pharm.D.

[Redacted]

June 26, 2012  
Date

Michael N. Souranis, P.D., President  
Board of Pharmacy  
4201 Patterson Avenue  
Baltimore, Maryland 21215

Re: Surrender of Pharmacist License  
License No. 15601  
Case No. 11-016

Dear Mr. Souranis and Members of the Board:

Please be advised that I have decided to surrender my license to practice pharmacy in the State of Maryland, License Number 15601. I understand that I may not give pharmacy advice to any individual, with or without supervision and/or compensation, cannot practice pharmacy or otherwise engage in the practice of pharmacy as it is defined in the Pharmacy Practice Act (the "Act"), Md. Health Occ. (H.O.) Code Ann. § 12-101, *et seq.*, (2009 Repl. Vol. and 2011 Supp.). In other words, as of June 13, 2012, the effective date of this Letter of Surrender, I understand that the surrender of my license means that I am in the same position as an unlicensed individual.

I understand that this Letter of Surrender is a **PUBLIC** document.

My decision to surrender my license to practice pharmacy in Maryland has been prompted by an investigation of my licensure by the Maryland Board of Pharmacy (the "Board").

The Board's investigation resulted in a Summary Suspension issued on April 20, 2011. I did not request a Show Cause hearing. Consequently, the Board issued a Notice of Intent to Revoke my License on November 16, 2011. The Board's Notice was based upon several violations of its Act and regulations thereunder.

I requested a hearing and the Board held a Case Resolution Conference (CRC) at which Lenna Israbian-Jamgochiam, P.D. and Harry Finke, P.D., Board members, YuZon Wu, P.D., Board Compliance Officer, and, Linda Bethman and Brett Felter,

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Board Counsel, were present. I also present, with my attorney, Gary Weissner, as was the Administrative Prosecutor, Roberta Gill. As a result of that CRC, which was later accepted by the Board at a subsequent meeting, I agreed to surrender my license, for the reasons and according to the terms set forth below.

I acknowledge that my Maryland license was summarily suspended because of my Suboxone addiction and that I am currently seeking rehabilitation. These facts are fully set out in the Board's Summary Suspension Order of 4/20/11.

I affirm that I was made aware of the Board's actions through communications with representatives of the Office of the Attorney General and my legal counsel.

I have decided to temporarily surrender my license to practice pharmacy in Maryland

By virtue of this Letter of Surrender, I waive any right to contest those charges and findings. I wish to make it clear that I have voluntarily, knowingly and freely chosen to submit this Letter of Surrender. **I understand that, by executing this Letter of Surrender, I am waiving any right to contest these findings in a formal evidentiary hearing at which I would have had the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf and to all other substantive and procedural protections provided by law, including the right to appeal.**

I hereby affirm that I have permanently terminated any practice that I had in Maryland.

I acknowledge that, on or before the effective date of this Letter of Surrender, I shall present to the Board my Maryland pharmacy license, number 15601, including any renewal certificates and wallet-sized renewal cards.

I understand that the Board will advise the Data Bank of this Letter of Surrender, and in any response to inquiry, that I have surrendered my license in lieu of further disciplinary action under the Act as resolution of the matters pending against me. I also understand that, in the event I would apply for licensure in any form in any other State or jurisdiction, that this Letter of Surrender, and all underlying documents, may be released or published by the Board to the same extent as a final order that would result from disciplinary action pursuant to Md. State Gov't Code Ann. §10-611, *et seq.*, (2009 Repl. Vol. and 2011 Supp.).

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I further recognize and agree that by agreeing to this Letter of Surrender, my license will be reinstated only upon compliance with the following terms and conditions:

1. I may petition for reinstatement on or after September 1, 2015 provided that:
  - A. I submit documentation of my completion of my PEAC contract and participation in rehabilitation programs;
  - B. I successfully complete a college-level ethics course pre-approved by the Board;
  - C. I comply with all licensure reinstatement requirements set forth in Code Md. Regs tit. 10. § 34.13;
  - D. I submit to a substance abuse evaluation by a Board-assigned evaluator;
  - E. And, I understand that, if the Board reinstates my license, the Board may place my license on probation and impose any conditions it determines appropriate
2. I understand that I bear the costs of all reinstatement conditions.

I acknowledge that I may not rescind this Letter of Surrender in part or in its entirety, until September 1, 2015. Finally, I wish to make clear that I have consulted with an attorney before signing this Letter of Surrender. I understand both the nature of the Board's actions and this Letter of Surrender fully. I acknowledge that I understand and comprehend the language, meaning and terms and effect of this Letter of Surrender. I make this decision knowingly and voluntarily.

Sincerely,



Sohail Mosaaddegh, Pharm.D.

Read and Accepted:



Gary Weissner, Esquire  
Attorney for the Respondent

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**NOTARY**

STATE OF Maryland :  
CITY/COUNTY OF Howard :

I HEREBY CERTIFY that on this 13th day of JUNE, 2012,  
before me, Sohail Mosaaddegh, a Notary Public of the State and City/County  
(Print Name)  
aforesaid, personally appeared Sohail Mosaaddegh, Pharm.D., and declared and  
affirmed under the penalties of perjury that signing the foregoing letter of surrender was  
his voluntary act and deed.

AS WITNESS my hand and notarial seal.

Harry Gueno  
Notary Public Harry Gueno

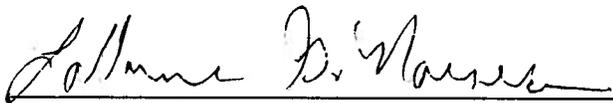
My Commission expires: 6/9/2015

**Harry Gueno**  
Notary Public  
Howard County, MD  
My Commission Expires 6/9/2015

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**ACCEPTANCE**

**ON BEHALF OF THE BOARD OF PHARMACY**, on this 21<sup>st</sup> day of  
June, 2012, I accept Sohail Mosaaddegh's, public letter of surrender of  
his license to practice pharmacy in the State of Maryland.

*for*   
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Michael N. Souranis, P.D., President  
Maryland Board of Pharmacy

cc: John Nugent, Principal Counsel  
Roberta Gill, AAG, Administrative Prosecutor  
Linda Bethman, AAG, Board Counsel  
Brett Felter, Staff Attorney, Board Counsel  
LaVerne G. Naesea, Executive Director  
YuZon Wu, P.D., Pharmacist Compliance Officer  
Vanessa Thomas-Gray, Compliance Investigator  
Gloria Toney Brown, Administrative Officer  
Rosalind Spellman, Administrative Officer