BEFORE THE MEDICAL LICENSING BOARD OF INDIANA
CAUSE NO. 2011 MLB 0022

IN THE MATTER OF THE LICENSE OF	)	FILED
	)	
MARK ROBIN GEIER, M.D.	)	APR 05 2012
	)	
LICENSE NO: 01065921A	)	Indiana Professional Licensing Agency
(Emergency Suspension)		

COMPLAINT

This complaint is brought against the medical license of Mark Robin Geier, M.D. ("Respondent"), by the State of Indiana, by counsel, Deputy Attorney General, Amber Swartzell, on behalf of the Office of the Attorney General ("Petitioner") and pursuant to Indiana Code § 25-1-7-7, Ind. Code § 25-1-5-3, Ind. Code art. 25-22.5, the Administrative Orders and Procedures Act, Ind. Code ch. 4-21.5-3 and Ind. Code ch. 25-1-9, and in support alleges and states:

FACTS

1. Respondent's address on file with the Medical Licensing Board of Indiana ("Board") is 14 Redgate Ct., Silver Spring, Maryland 20905. Respondent is a licensed medical doctor ("M.D.") in the State of Indiana, holding Indiana license number 01065921A.

2. Respondent also holds medical licenses in each of the following states: California, Florida, Hawaii, Illinois, Kentucky, Maryland, Missouri, New Jersey, Virginia, and Washington.

3. Respondent's active office address in Indiana is Genetic Consultants of Indianapolis, 9595 Whitley Drive, Suite 205, Indianapolis, Indiana 46240.

4. On or about April 27, 2011, the Maryland State Board of Physicians ("Maryland Board") issued an Order for Summary Suspension of License to Practice Medicine ("Maryland Order"). The Maryland Order summarily suspended Respondent's license number D24250 to practice medicine in that state. Respondent's license remains suspended in Maryland.

5. The Maryland Order states that "the public health, safety or welfare imperatively requires emergency action in this case" due to the Maryland Board's Investigative Findings which concluded that the Respondent:

a. Misdiagnosed autistic children with precocious puberty and other genetic abnormalities and treated them with potent hormonal therapy ("Lupron therapy") and chelation therapy, both of which have a substantial risk of adverse side effects, thus exposing children to needless risk of harm;

b. Failed to conduct adequate physical examinations of patients in several instances before starting Lupron therapy;

c. Failed to obtain adequate informed consent from the parents of autistic children he treated;

d. Endangers autistic children by administering a treatment protocol that has a substantial risk of serious harm and is neither consistent with evidence-based medicine nor generally accepted in the relevant scientific community;

e. Misrepresented his credentials by declaring himself to be a board-certified epidemiologist and geneticist, which he was not; and,

f. Maintained an Institutional Review Board which does not meet Federal regulations.

6. On or about May 26, 2011, and based upon the Maryland Order, the State of Washington Department of Health Medical Quality Assurance Commission ("Washington Board") issued an Ex Parte Order of Summary Suspension of Respondent's license to practice medicine in that state. Respondent's Washington license number MD60041602 is now indefinitely suspended.

7. On or about June 9, 2011, and based upon the Maryland Order, the Commonwealth of Virginia Department of Health Professions ("Virginia Board") issued an Order suspending Respondent's license to practice medicine in that state. Respondent's Virginia license number 0101-048672 remains suspended.

8. On or about June 23, 2011, and based upon the Maryland Order, the Board granted a Summary Suspension against Respondent's license to practice medicine in the State of Indiana. Respondent's Indiana license number 01065921A remains summarily suspended.

9. On or about August 3, 2011, and based upon the Maryland Order, the State of California Medical Board ("California Board") issued a Suspension/Restriction Order suspending Respondent's license to practice medicine in that state. Respondent's California license number G88736 remains suspended. On or about August 30, 2011, a complaint on this matter was filed by the California Attorney General's Office.

10. On or about September 15, 2011, and based upon the Maryland Order, the State of New Jersey Board of Medical Examiners ("New Jersey Board") issued a Consent Order suspending Respondent's license to practice medicine in that state. Respondent's New Jersey license number MA85532 remains suspended and may not be re-activated without having a clear license to practice in Maryland, as per Consent Order agreement.

11. On or about December 12, 2011, Respondent submitted a written waiver to the Washington Board, waiving his right to a hearing in regards to the suspension of his medical license in that state.

12. On or about January 13, 2012, and based on Respondent's waiver, the Washington Board issued a Final Order regarding the status of Respondent's medical license in that state, placing Respondent's license on an indefinite suspension. This license may not be re-activated without having a clear license to practice in Maryland.

13. On or about March 22, 2012, the Maryland Board issued a Final Order regarding the original Maryland Order after an ALJ hearing was completed and exceptions to the ALJ decision were filed. The Maryland Board affirmed the continuation of the Emergency Summary Suspension issued in the Final Order. Respondent's Maryland license remains suspended.

COUNT I

14. Paragraphs 1 through 13 are incorporated by reference herein.

15. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(7) in that Respondent has had disciplinary action taken against his license to practice in any state or jurisdiction on grounds similar to those under Ind. Code § 25-1-9 as evidenced by the Final Order issued by the Maryland Board on March 22, 2012.

COUNT II

16. Paragraphs 1 through 13 are incorporated by reference herein.

17. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(7) in that Respondent has had disciplinary action taken

against his license to practice in any state or jurisdiction on grounds similar to those under Ind. Code § 25-1-9 as evidenced by the Final Order issued by the Washington Board on January 13, 2012.

COUNT III

18. Paragraphs 1 through 13 are incorporated by reference herein.

19. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(7) in that Respondent has had disciplinary action taken against his license to practice in any state or jurisdiction on grounds similar to those under Ind. Code § 25-1-9 as evidenced by the Consent Order issued by the New Jersey Board on September 15, 2011.

WHEREFORE, Petitioner demands an order against the Respondent, that:

1. Imposes the appropriate disciplinary sanction;
2. Extends, as necessary, the existing summary suspension to ensure that Respondent's license remains on summary suspension until a final order is issued in this matter;
3. Directs Respondent to immediately pay all of the cost incurred in the prosecution of this case; and
4. Provides any other relief the Board deems just and proper.

Respectfully submitted,

GREGORY F. ZOELLER
Attorney General of Indiana
Attorney Number: 1958-98

By: Amber Swartzell

Amber Swartzell
Deputy Attorney General
Attorney Number: 29508-49

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Complaint" has been served upon the individuals listed below, by United States mail, first class postage prepaid, on this 5th day of April, 2012.

Mark Robin Geier, M.D.
14 Redgate Ct.
Silver Spring, Maryland 20905

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