

**Mansour G. Panah, M.D.**



October 31, 2014

Devinder Singh, M.D., Chair  
Maryland Board of Physicians  
4201 Patterson Avenue, 4<sup>th</sup> Floor  
Baltimore, MD 21215

RE: Permanent Surrender of License to Practice Medicine  
Mansour G. Panah, M.D.  
License Number: D15506  
MBP Case Numbers: 2006-0475 and 2013-0854

Dear Dr. Singh and Members of the Board,

Please be advised that I have decided to **PERMANENTLY SURRENDER** my license to practice medicine in the State of Maryland, License Number D15506, effective immediately. I understand that upon surrender of my license, I may not give medical advice or treatment to any individual, with or without compensation, and cannot prescribe medications or otherwise engage in the practice of medicine in the State of Maryland as it is defined in the Maryland Medical Practice Act (the "Act"), Md. Health Occ. Code Ann., §§ 14-101 *et seq.* (2005 Repl. Vol. and 2013 Supp.) and other applicable laws. In other words, as of 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 in the State of Maryland.

I understand that this Letter of Surrender is a **PUBLIC DOCUMENT** and on the Board's acceptance, becomes a **FINAL ORDER** of the Board.

My decision to permanently surrender my license to practice medicine in the State of Maryland has been prompted by an investigation of my license by the Maryland Board of Physicians (the "Board") and the Office of the Attorney General. The investigation resulted in the Board's issuance of disciplinary charges against me under Board Case Numbers 2006-0475 and 2013-0854.

I have decided to permanently surrender my license to practice medicine in the State of Maryland, in part, to avoid further prosecution of the disciplinary charges now pending before a Disciplinary Panel of the Board and, in equal part,

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due to my neurocognitive condition.

I acknowledge that the Board initiated an investigation of this matter and that on October 8, 2013, issued disciplinary charges under Board Case Numbers 2006-0475 and 2013-0854, alleging that I violated the probationary conditions set forth in the Consent Order, dated May 31, 2011, to which I was subject, and that I violated the following provisions of the Act under Md. Health Occ. Code Ann. § 14-404(a): (3) Is guilty of: (ii) Unprofessional conduct in the practice of medicine; (4) Is professionally, physically, or mentally incompetent; and (18) Practices medicine with an unauthorized person or aids an unauthorized person in the practice of medicine. A copy of the Board's charges, dated October 8, 2013, is attached hereto and incorporated herein. The Charges were based in part on neuropsychological testing I underwent that determined that I was cognitively impaired.

I participated in a formal evidentiary hearing before the Office of Administrative Hearings, which resulted in the issuance of a Proposed Decision, which is now pending before the Board. I wish to make it clear that I have voluntarily, knowingly and freely chosen to submit this Letter of Surrender to avoid further prosecution of the aforementioned disciplinary charges and, in equal measure, because of my cognitive impairment. I acknowledge that for all purposes relevant to medical licensure, the allegations that were set forth in the Board's disciplinary charges will be treated as if proven, and that I admit that I violated the probationary conditions set forth in the Consent Order, dated May 31, 2011, and that I violated Md. Health Occ. Code Ann. §§ 14-404(a)(3)(ii), (4) and (18).

I acknowledge that I underwent a formal evidentiary hearing in which I was given the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf and to make summation and arguments. I understand that by executing this permanent letter of surrender, I am waiving any right to contest the Board's disciplinary charges, including all substantive and procedural protections provided by law, and the right to appeal.

I affirm that I have not practiced medicine since the Board summarily suspended my medical license on October 8, 2013. I do not maintain a medical office and have no hospital privileges in the State of Maryland.

I understand that the Board will advise the Federation of State Medical Boards and the National Practitioner Data Bank and the Healthcare Integrity and Protection Databank of this Letter of Surrender, and in response to any inquiry, that I have surrendered my license in lieu of further disciplinary action under the

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Act. 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 the underlying investigative 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 2013 Supp.), and that this Letter of Surrender shall constitute a disciplinary action by a Disciplinary Panel of the Board.

I affirm that as of the date of this Letter of Surrender, I will present to the Board my original Maryland medical license number D15506, and my most recent wallet-sized renewal card. I acknowledge that on or before the date the Board accepts this Letter of Surrender, I shall deliver to the Board: (1) any and all Medical Assistance prescription forms in my possession; (2) any prescription forms and pads in my possession; (3) any prescription forms or pads on which my name and Drug Enforcement Administration Registration Number are imprinted; and (4) within thirty (30) days of signing this Letter of Surrender, I will destroy any controlled dangerous substances in my possession, other than those prescribed by a licensed physician for me, and furnish proof to the Board that the controlled dangerous substances have been destroyed.

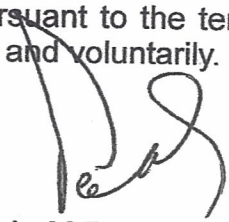
I acknowledge that on or before the effective date of this Letter of Surrender, I shall deliver to the Division of Drug Control, 4201 Patterson Avenue, 1<sup>st</sup> Floor, Baltimore, Maryland 21215, my Maryland Controlled Dangerous Substances Certificate; and shall deliver to the United States Drug Enforcement Administration my Drug Enforcement Administration Registration Card.

I further recognize and agree that by tendering this Letter of Surrender that my license will remain permanently surrendered. In other words, I agree that I have no right to reapply for a license to practice medicine in the State of Maryland. I further agree that the Board, or a Disciplinary Panel of the Board, is not obligated to consider any application for licensure that I might file at a future date and that I waive any hearing rights that I might possess regarding any such application.

I acknowledge that I may not rescind this Letter of Surrender in part or in its entirety for any reason whatsoever. Finally, I wish to make clear that I have been advised of my right to be represented by the attorney of my choice throughout proceedings before the Board, or a Disciplinary Panel of the Board, including the right to counsel with an attorney prior to 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 voluntarily choose to surrender my Maryland license to practice medicine pursuant to the terms and

surrender my Maryland license to practice medicine pursuant to the terms and conditions set out herein. I make this decision knowingly and voluntarily.

Very truly yours,



Mansour G. Panah, M.D.

10/14/10

Read and approved:

 10/21/14

Edward J. Leyden, Esquire  
Counsel for Dr. Panah

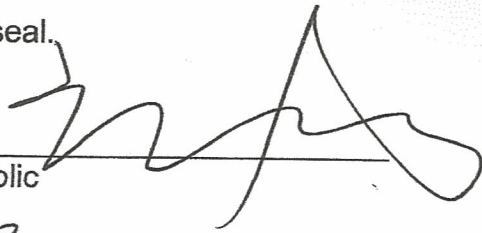
NOTARY

STATE OF Maryland

CITY/COUNTY OF Gaithersburg / Montgomery County

I HEREBY CERTIFY that on this 14 day of October 2014 before me, a Notary Public of the City/County aforesaid, personally appeared Mansour G. Panah, M.D., and declared and affirmed under the penalties of perjury that the signing of this Letter of Surrender was his voluntary act and deed.

AS WITNESS my hand and Notarial seal.



Notary Public

My commission expires: 08/30/2018



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NOTARY PUBLIC 7596685  
COMMONWEALTH OF VIRGINIA

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### **ACCEPTANCE**

On behalf of the Maryland State Board of Physicians, on this 31<sup>st</sup> day of October, 2014, I, Devinder Singh, M.D., accept Mansour G. Panah, M.D.'s **PERMANENT SURRENDER** of his license to practice medicine in the State of Maryland.



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Devinder Singh, M.D., Chair  
Maryland State Board of Physicians

cc: Robert J. Gilbert, Deputy Counsel, HOPL  
Mansour G. Panah, M.D.  
Dana Mullen, Compliance Analyst