COMMONWEALTH OF MASSACHUSETTS

Middlesex, SS. Board of Registration in Medicine

 Adjudicatory Case No. 2021-034

 )

In the Matter of )

 )

GURMANDER S. KOHLI, M.D. )

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**STATEMENT OF ALLEGATIONS**

 The Board of Registration in Medicine (Board) has determined good cause exists to believe the following acts occurred and constitute a violation for which a licensee may be sanctioned by the Board. The Board therefore alleges Gurmander S. Kohli, M.D. (Respondent) has practiced medicine in violation of law, regulations, or good and accepted medical practice as set forth herein. The investigative docket number associated with this order to show cause isDocket No. 19-203.

Biographical Information

1. Gurmander S. Kohli, M.D. graduated from the University of Glasgow in June 1973 and completed training between 1973 and 1975 at the Western and Royal Infirmaries, and Charing Cross Hospital, all in Glasgow. Dr. Kohli has been licensed to practice medicine in Massachusetts under certificate number 38488 since August 21, 1975 and in California since 2005.

Factual Allegations

November 5, 2018 Statement

1. On November 5, 2018 Board investigators interviewed the Respondent in relation to an investigation into another physician, with whom the Respondent worked.
2. The other physician was alleged to have allowed an unlicensed individual to perform medical procedures.
3. On November 5, 2018 the Respondent told investigators that he did not meet Patient A prior to the day of harvesting stem cells, liposuction, and platelet rich plasma therapy (PRP) for hair restoration on November 1, 2017. The Respondent did not have any records available to him during said interview to refresh his memory of events concerning Patient A’s treatment.
4. On November 5, 2018 the Respondent told investigators he performed most of the liposuction procedure and was not involved in the PRP procedure related to Patient A on November 1, 2017.

April 4, 2019 Signed Affidavit

1. On April 4, 2019 the Respondent attested to statements under the pains and penalties of perjury in a sworn and signed affidavit that was provided to Board for consideration. The Respondent’s Affidavit dated April 4, 2019 is attached hereto as Attachment A and incorporated herein by reference.
2. In his April 4, 2019 affidavit and contrary to earlier statements, the Respondent asserted that he did have an office encounter with Patient A on October 12, 2017 before the November 1, 2017 procedures. A copy of the office note confirming this fact was attached to the April 4, 2019 affidavit.
3. In his April 4, 2019 affidavit the Respondent asserted that he personally observed his physician colleague, and not the unlicensed individual, perform the PRP procedure on Patient A on November 1, 2017.

March 11, 2021 Statement

1. On March 11, 2021 and contrary to his April 4, 2019 affidavit, the Respondent told the Board’s Complaint Committee he was not present in the room and did not see who performed the PRP procedure on Patient A on November 1, 2017.

Legal Basis for Proposed Relief

1. The Respondent engaged in conduct that has the capacity to deceive or defraud in violation of 243 CMR 1.03(5)(a)(10).
2. The Respondent engaged in conduct that undermines the public confidence in the integrity of the medical profession. *See* Raymond v. Board of Registration in Medicine, 387 Mass. 708 (1982); Levy v. Board of Registration in Medicine, 378 Mass. 519 (1979).

The Board has jurisdiction over this matter pursuant to G.L. c. 112, §§ 5, 61 and 62. This adjudicatory proceeding will be conducted in accordance with the provisions of G.L. c. 30A and 801 CMR 1.01.

Nature of Relief Sought

 The Board is authorized and empowered to order appropriate disciplinary action, which may include revocation or suspension of the Respondent's license to practice medicine. The Board may also order, in addition to or instead of revocation or suspension, one or more of the following: admonishment, censure, reprimand, fine, the performance of uncompensated public service, a course of education or training or other restrictions upon the Respondent's practice of medicine.

# Order

Wherefore, it is hereby **ORDERED** that the Respondent show cause why the Board should not discipline the Respondent for the conduct described herein.

 By the Board of Registration in Medicine,

 Signed by George Abraham, M.D.

 George Abraham, M.D.

 Board Chair

Date: July 7, 2021

To obtain a copy of the out-of-state disciplinary order, please contact the appropriate state’s medical licensing board directly. A list of state medical boards and contact information is available at <https://www.fsmb.org/contact-a-state-medica-board/>. You may also obtain a copy of the out-of-state disciplinary order by submitting a public records request (PRR) with the Massachusetts Board of Registration in Medicine. PRR forms and additional information can be found at <https://www.mass.gov/board-of-registration-in-medicine-public-records>.