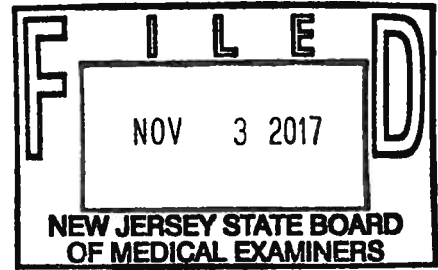


CHRISTOPHER S. PORRINO  
ATTORNEY GENERAL OF NEW JERSEY  
Division of Law  
124 Halsey Street, 5<sup>th</sup> Floor  
P.O. Box 45029  
Newark, New Jersey 07101  
By: Delia DeLisi  
Deputy Attorney General  
Attorney ID. 008972004  
Tel: (973)648-4741



STATE OF NEW JERSEY  
DEPARTMENT OF LAW & PUBLIC SAFETY  
DIVISION OF CONSUMER AFFAIRS  
STATE BOARD OF MEDICAL EXAMINERS

IN THE MATTER OF THE SUSPENSION OR :  
REVOCAION OF THE LICENSE OF :  
: Administrative Action  
SHARON C. WOROSILO, M.D. :  
LICENSE NO. 25MA06384700 : VERIFIED COMPLAINT  
:  
TO PRACTICE MEDICINE AND SURGERY :  
IN THE STATE OF NEW JERSEY :

CHRISTOPHER S. PORRINO, Attorney General of New Jersey, by Delia A. DeLisi, Deputy Attorney General, with offices located at 124 Halsey Street, Fifth Floor, Newark, New Jersey, by way of Verified Complaint, says:

GENERAL ALLEGATIONS

1. Complainant, Christopher S. Porrino, Attorney General of New Jersey, is charged with enforcing the laws of the State of New Jersey, pursuant to N.J.S.A. 52:17A-4(h), and is empowered to initiate administrative disciplinary proceedings against persons licensed by the New Jersey State Board of Medical Examiners (the "Board") pursuant to N.J.S.A. 45:1-14 et seq.

**CERTIFIED TRUE COPY**

2. The Board is charged with the duty and responsibility of regulating the practice of medicine and surgery in the State of New Jersey pursuant to N.J.S.A. 45:1-14 et seq. and 45:9-1 et seq.

3. Respondent Sharon C. Worosilo, M.D. is licensed to practice medicine and surgery in the State of New Jersey, and has been a licensee at all times pertinent to this Complaint. The current status of Respondent's license is "Active".

4. Respondent is Board Certified in Anesthesiology.

5. Respondent currently practices at and owns both the New Jersey Pain Management Institute ("NJPMI") in Somerset, New Jersey and Precision Surgical Center ("PSC") in East Brunswick, New Jersey. (Certification of Delia DeLisi filed herewith, ("DeLisi Cert."), Exhibit A).

6. On October 23, 2017, the Board notified the Division of Law ("DOL") of a phone call received from Respondent alleging that her partner was "running a drug ring" out of her practice. Respondent would not divulge the name of her partner but urged the Board to look into her complaint. (DeLisi Cert., Exhibit G, Division of Consumer Affairs Enforcement Bureau Subject Interview)

7. On October 26, 2017, the DOL was notified, this time by a representative of the Professional Assistance Program of New Jersey ("PAP"), that the PAP had received numerous calls

alleging that Respondent was displaying erratic behavior and smelled of alcohol while practicing. Later that day, the PAP sent a letter to the Board documenting this information. (DeLisi Cert., Exhibit B, Letter from Executive Medical Director of the PAP, Dr. Louis Baxter to Executive Director of the Board, Mr. William Roeder dated October 26, 2017)

8. Investigators from the Enforcement Bureau of the Division of Consumer Affairs ("EB") arranged to meet with Respondent on Friday October 27, 2017 at her Somerset practice, which was closed for the day. On that date, investigators April Amisson and Yanis Carreto observed Respondent to be exhibiting paranoid and delusional behavior. An officer from the local Franklin Township Police Department contacted a Psychiatric Emergency Screening Services (PESS) unit which responded to the scene. (DeLisi Cert., Exhibit G)

9. Investigator Amisson, asked Respondent to contact the PAP, which she did, but the office was already closed. Investigator Amisson asked Respondent to agree not to practice medicine until she had been assessed by the PAP, to which Respondent verbally agreed. (Ibid.)

10. Also, on October 27, 2017, after speaking with Respondent, the PESS representative arranged for Respondent to be evaluated by a psychiatrist later that day. Inv. Amisson was told by this representative that Respondent was evaluated but

not admitted to a hospital as a result of that evaluation.  
(Ibid.)

11. On October 31, 2017, Respondent appeared at the PAP for an appointment and was seen by Dr. Louis E. Baxter, Executive Medical Director of the PAP. On that date, Dr. Baxter presented Respondent with a Consent Order for the voluntary surrender of her license provided to him by the DOL. Respondent did not sign the Consent Order nor did she sign any releases or an agreement to engage with the PAP. (DeLisi Cert., Exhibit H, E-mail dated October 21, 2017 from Dr. Louis Baxter)

COUNT I

12. The General Allegations are repeated and re-alleged as if set forth at length herein.

13. On October 1, 2017, Respondent and Dr. Yanow, Respondent's former employee, had a telephone conversation during which Respondent rambled on and was intoxicated. Respondent told Dr. Yanow, "I had a nervous breakdown last Wednesday" and "I had a nervous breakdown last Wednesday because I don't want to be the richest woman in the world" commenting on how she had paintings worth a billion dollars. (DeLisi Cert., Exhibit E, Certified Statement of Jennifer Yanow, MD)

14. On October 8, 2017, Respondent chartered a jet and flew to Chicago apparently to see Dr. Yanow run a marathon.

Respondent located Dr. Yanow and was very upset at her and intoxicated. Respondent wanted Dr. Yanow to go back with her on the jet but Dr. Yanow declined and had never expected Respondent to come to Chicago. (Ibid.)

15. On October 16, 2017, Respondent met with a new patient who had called that day for an appointment for medications. After having seen the patient for a few minutes, Respondent yelled that he was a "drug addict" and told him to "get the fuck out of my office." (DeLisi Cert., Exhibit E and Certified Statement of Lori Pastula, Exhibit F) Respondent then yelled to staff to call 911 and ran to get a knife and came into the lobby waving the knife in the air with the room full of patients. At no time did the staff feel threatened by the patient but rather they were alarmed by Respondent's conduct. (DeLisi Cert., Exhibit F)

16. On October 17, 2017, Adam Lipson, M.D. was at PSC to perform surgeries. Respondent had a very odd affect and was joking with his patients. Respondent approached his patient with a Duracell battery and told the patient that Dr. Lipson could just put the battery in him and "stick it where the sun doesn't shine." Dr. Lipson found this behavior to lack professionalism and thought Respondent seemed impaired. Following this incident, he cancelled all of his future scheduled surgeries at PSC. In the following week, Dr. Lipson's

patients told him that Respondent had reached out to them for suture removal and follow-up though they had "no care relationship with her" and one patient commented he thought she was high. (DeLisi Cert., Exhibit C, Certified Statement of Adam Lipson, MD)

17. Also, on October 17, 2017, Respondent came into PSC playing vulgar music at a high volume and dancing. Dr. Yanow turned the volume down many times but Respondent would just turn it up again. (DeLisi Cert., Exhibit E and Exhibit D, Certified Statement of Tara Callahan)

18. On October 17, 2017, after Dr. Yanow performed a procedure on a patient's knee, Respondent decided that this patient should have injections in his back. Dr. Yanow objected since the patient was not there for treatment of his back and was under the care of a spinal surgeon for his back issues. Rather than listen to Dr. Yanow, Respondent became enraged and yelled at her. Respondent told this patient that she could help him and he didn't need surgery. Respondent decided the patient needed an L5 epidural injection. She played loud music in the Operating Room and danced while asking the patient why he did not know the lyrics and called him "brotha." (Ibid.)

19. The patient was fused from L4-S1. Respondent attempted for more than forty minutes to do the injection. Respondent repeatedly asked Ms. Callahan, a per diem X-ray

technician, questions about the procedure such as "What should I do next?" and "what do you think?" As the patient was awake during this procedure, Ms. Callahan responded that, although she was very good at her own job, it was Respondent's decision as to how to treat the patient as she was the doctor. (Ibid.) After about an hour, Respondent came out and said to Dr. Yanow "It's all yours." (DeLisi Cert., Exhibit E)

20. Following that patient encounter, Respondent brought another of Dr. Yanow's patients in for a procedure. The patient was awake but did not speak English and was on the table for about an hour. When Respondent came in she voiced that she wanted to change his procedure and left the room again. At this point, Ms. Callahan was so disturbed that she left all of her equipment and ran out of PSC. (DeLisi Cert., Exhibit D)

21. On October 19, 2017, the PAP sent Respondent a certified letter asking that she contact the PAP to schedule an appointment. On October 23, 2017, Dr. Baxter called Respondent and asked that she contact the PAP by October 26, 2017 or a report would be made to the Board. Respondent did not contact the PAP by that date. (DeLisi Cert., Exhibit B)

22. On October 26, 2017, the PAP notified the Board as to numerous concerning calls they received regarding Respondent. The PAP documented these calls, which alleged that Respondent had recently begun exhibiting erratic and delusional behavior

while working at PSC. Among the allegations, was that Respondent advised staff that she was waiting for calls from President Obama and Hillary Clinton so that they could "take down Trump"; that she entered the Operating Room dancing and blasting loud music; that she had performed an unauthorized procedure on a patient while asking the x-ray technician present how to perform the procedure; and that she had the odor of alcohol on her breath daily. (DeLisi Cert., Exhibit B).

23. On October 27, 2017, in response to both the phone call from Respondent to the Board and the numerous complaints called into the PAP regarding Respondent, EB investigators Amisson and Carreto met with Respondent at her Somerset practice which was closed to patients that day. (DeLisi Cert., Exhibit G)

24. During this meeting, Respondent was disorganized in her thinking and difficult to redirect to answering the questions asked by the investigators. Respondent exhibited episodes where she paused mid-sentence and stared blankly with a flat affect. Once the interview began, Respondent apologized for the wall color of the room and also decided she wanted to use different chairs and had someone come into the room to replace the existing chairs. (Ibid.)

25. Respondent was asked about the "pill ring", which she had alleged during her phone call to the Board. Instead of addressing the question, Respondent vacillated between topics



including: how her partner Dr. Yanow was supposed to take over the practice (while muttering an expletive about her); speaking about haircuts; a cancelled trip to Italy; how she was starting another business; how she had offered to buy everyone a house; and terminating her staff who were part of the "drug ring", including her partner Dr. Yanow whom she referred to as "Junior." (Ibid.)

26. Respondent further recounted how she took a private jet to Chicago when she heard that "Junior" was running in a marathon there. She had e-mailed all the staff about joining her but no one responded so she went by herself. While there she searched for Dr. Yanow and finally tracked her down offering to fly her home that night. Dr. Yanow declined and the Respondent took the jet home, drinking alcohol on the flight back. (Ibid.)

27. Respondent further spoke of a discussion she had with Dr. Yanow about selling Dr. Yanow the practice which ended with Respondent telling Dr. Yanow to "get the fuck out." Respondent then changed topics and spoke of "Master Po Kung Fu grasshopper." (Ibid.)

28. Respondent further reported the following:

- Changing the locks to the office four times since she "got rid of everybody."
- Having the locksmith change the lock because she

believed he was conspiring with "the shady people."

- Calling the locksmith "evil", "sinister" and "the non-real locksmith."
- Claiming to know President Barack Obama and criticizing staff for not telling her his people called, then declaring "I'm not delusional, that's how I roll."
- Stating that she had called the Franklin Police on October 16 because a patient was banging on the window in response to which she got a knife.
- Calling the patient record room the "evidence room" which was observed to contain piles of miscellaneous items, including children's toys, electronics, tools, medical records, biohazard containers and a large trash can filled with papers that appeared to be various documents obtained from medical records.
- Saying that she believed the "pill ring" called the PAP and that the letter was fabricated by them, after which she opened the sealed envelope from the PAP.

29. Respondent thereafter agreed to contact the PAP and did but reached voice mail. (Ibid.)

30. On October 27, 2017, Respondent was evaluated by Psychiatric Emergency Screening Services (PESS). Arrangements

were then made for Respondent to meet with Dr. Ansari for a psychiatric evaluation later that day. Respondent was evaluated and released. (Ibid.)

31. On October 31, Respondent arrived at the PAP for her appointment. She met with Dr. Baxter but refused to sign any releases or an agreement to comply with the PAP. Dr. Baxter also gave her a copy of the Consent Order provided to him by the DOL, to which she stated that she wanted to discuss the matter with her attorney. (DeLisi Cert., Exhibit H)

32. Respondent's highly erratic and disturbing behavior indicates that she is presently impaired in a manner that has and will likely continue to impair her ability to practice medicine and surgery with reasonable skill and safety in violation of N.J.S.A. 45:1-21 (i) and (l).

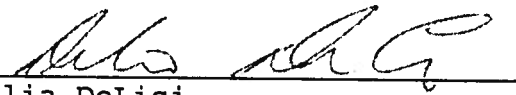
33. Respondent's conduct poses a clear and imminent danger to the public and constitutes grounds for the immediate temporary suspension of her license to practice medicine and surgery in the State of New Jersey pursuant to N.J.S.A. 45:1-22.

WHEREFORE, Complainant demands the entry of an order against Respondent as follows:

1. The immediate temporary suspension of Respondent's license to practice medicine and surgery in the State of New Jersey pending a full plenary hearing;

2. An Order directing Respondent to cease and desist the practice of medicine and surgery in the State of New Jersey;
3. An Order requiring appropriate testing and evaluation;
4. The suspension or revocation of Respondent's license to practice medicine and surgery in the State of New Jersey following a plenary hearing;
5. Imposition of penalties for each separate offense as set forth herein pursuant to N.J.S.A. 45:1-21;
6. Costs including attorney's fees, investigative costs, fees for expert witnesses, and costs of trial (including transcripts) pursuant to N.J.S.A. 45:1-25; and
7. Such other relief as the Board of Medical Examiners shall deem just and appropriate.

CHRISTOPHER S. PORRINO  
ATTORNEY GENERAL OF NEW JERSEY

BY:   
\_\_\_\_\_  
Delia DeLisi  
Deputy Attorney General

DATED: November 2, 2017