

COMMONWEALTH OF MASSACHUSETTS

Middlesex, SS.

Board of Registration in Medicine

Adjudicatory Case No. 2016-004

In the Matter of)
)
)
BILAL HUSSAIN, M.D.)
_____)

STATEMENT OF ALLEGATIONS

The Board of Registration in Medicine (Board) has determined that 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 that Bilal Hussain, 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 is 14-222.

Biographical Information

1. The Respondent was born on January 1, 1968. He graduated from Temple University School of Medicine in 1994. He has been licensed to practice medicine in Massachusetts under certificate number 154896 since 1997. He is certified by the American Board of Internal Medicine. He maintains a private practice in North Attleboro, and is affiliated with Sturdy Memorial Hospital.

Factual Allegations

2. On November 22, 2002, the Respondent was involved in a motor vehicle accident in Attleboro, Massachusetts.

3. On April 3, 2003, the Respondent was arraigned in the Attleboro District Court on

one count of Negligent Operation of a Motor Vehicle, G.L. c. 90, § 24; he entered a plea of not guilty.

4. On May 9, 2003, the Respondent admitted to sufficient facts, and was placed on probation for a period of eighteen (18) months, and was ordered to complete a course of education.

5. In Massachusetts, a license to practice medicine is issued for a defined period of time, typically two years.

6. To renew a license, physicians are required to complete and file with the Board a Massachusetts Physician Renewal Application (Renewal Application) prior to the expiration date stated on that physician's certificate of registration; the Renewal Application must be signed by the physician under penalty of perjury that the answers contained within the application are "true, correct, and complete."

2004 Massachusetts Physician Renewal Application

7. Relevant to this matter, the Respondent's certificate of registration bore an expiration date of January 1, 2004.

8. On December 23, 2003, the Respondent signed and filed with the Board a Renewal Application (2004 Renewal Application).

9. Question 17 of the Respondent's 2004 Renewal Application asked the following question:

17. Have you been charged with any criminal offense?

10. In his 2004 Renewal Application, the Respondent falsely answered "no" to Question 17.

Legal Basis for Proposed Relief

A. Pursuant to G.L. c. 112, § 5, ninth par. (a) and 243 CMR 1.03(5)(a)1, the Board may discipline a physician upon proof satisfactory to a majority of the Board, that said physician has by fraudulently procuring his certificate of registration or its renewal.

B. Pursuant to 243 CMR 1.03(5)(a)10, the Board may discipline a physician upon proof satisfactory to a majority of the Board, that said physician practiced medicine deceitfully, or engaged in conduct that has the capacity to deceive or defraud.

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,



Kathleen S. Meyer, Esq
Board Vice Chair

Date: January 21, 2016