

COMMONWEALTH OF MASSACHUSETTS

Middlesex, SS.

Board of Registration in Medicine

Adjudicatory Case No. 2020-006

In the Matter of)

TIMOTHY K. ARGEROPLOS, 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 TIMOTHY K ARGEROPLOS, 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 Docket No. 18-424.

Biographical Information

1. The Respondent was born on April 29, 1989. He is a 2016 graduate of the American University of the Caribbean School of Medicine. He held a limited license to practice medicine in Massachusetts since May 19, 2016 under certificate number 268237. His limited license terminated based on his resignation from his residency program on November 30, 2018. The Respondent was affiliated with UMass Memorial Medical Center during his residency program.

Factual Allegations

2. The Respondent was charged with one count of Lewdness, Open and Gross pursuant to M.G.L. c.272 §16 after it was discovered that the he exposed himself to a female party in the library of Holy Cross College. The Respondent was arraigned in Worcester District Court on September 28, 2018.

3. The University of Massachusetts Medical School (“UMMS”) issued a notice of disciplinary action on the Respondent on November 27, 2018. The Respondent resigned from the UMMS Residency Program on November 30, 2018.

4. The Respondent was arraigned on one count of Photographing Unsuspecting Nude Person pursuant to M.G.L. c.272 §105 on March 13, 2019 after it was discovered that he took photographs of a female party underneath a desk without her knowledge or consent in the library of Assumption College.

5. One June 19, 2019, the Respondent plead to one count of Lewdness, Open and Gross, and one count of Photographing Unsuspecting Nude Person. The Respondent admitted to sufficient facts for a finding of guilty and received a Continuation Without a Finding (“CWOFF”). He was placed on probation until June 22, 2021.

Legal Basis for Proposed Relief

A. Pursuant to *Levy v. Board of Registration in Medicine*, 278 Mass. 519 (1979); *Raymond v. Board of Registration in Medicine*, 287 Mass. 78 (1982), the Board may discipline a physician upon proof satisfactory to a majority of the Board, that said physician lacks good moral character and engaged in conduct that undermines the public confidence in the integrity of the medical profession.

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,

Candace Lapidus Sloane, MD

Candace Lapidus Sloane, M.D.
Board Chair

Date: January 23, 2020