BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:	)	
ANJUM IONA USMAN, M.D.	)	**Case No. 8002015011121**
Physician's and Surgeon's Certificate No. G 89335	)	
Respondent	)	

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order for Public Reprimand is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on April 1, 2016.

IT IS SO ORDERED March 4, 2016.

MEDICAL BOARD OF CALIFORNIA

By: _____
Howard Krauss, M.D., Chair
Panel B

KAMALA D. HARRIS
Attorney General of California
JANE ZACK SIMON
Supervising Deputy Attorney General
State Bar No. 116564
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Attorneys for Complainant
Medical Board of California

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: **ANJUM IONA USMAN, M.D.** 603 E. Deihl Road #135 Naperville, IL 60563 Physician's and Surgeon's Certificate No. G89335 Respondent.	**Case No. 800-2015-011121** **STIPULATED SETTLEMENT AND DISCIPLINARY ORDER FOR PUBLIC REPRIMAND**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above entitled proceedings as follows:

1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board of California. This action has been at all times brought and maintained solely in the official capacity of the Medical Board's Executive Director, who is represented in this matter by Kamala D. Harris, Attorney General of the State of California, by Jane Zack Simon, Supervising Deputy Attorney General.

2. Anjum Iona Usman, M.D. (Respondent) is represented in this matter by Henry Lewin of the Law Offices of Lewin & Levin, Trident Center, 11377 West Olympic Blvd, 5th Floor, Los Angeles, CA 90064.

3. On March 27, 2013, the Medical Board of California issued Physician's and Surgeon's Certificate No. G89335 to Respondent. The certificate is renewed and current.

4. Accusation No. 800-2015-011121 (Accusation) was duly filed before the Medical Board of California (Board) and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent, who filed a Notice of Defense. A copy of the Accusation is attached as Exhibit A.

5. Respondent has carefully read, discussed with counsel, and understands the charges and allegations in the Accusation. Respondent has also carefully read, discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order for Public Reprimand (Stipulation).

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. For the purpose of resolving the charges and allegations in the Accusation without the expense and uncertainty of further proceedings, Respondent agrees that based upon the action taken by the Illinois Department of Financial and Professional Regulation Division of Professional Regulation as alleged in the Accusation, cause exists to discipline her California physician's and surgeon's certificate pursuant to Business and Professions Code sections 2305 and 141.

8. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Medical Board of California or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

9. This Stipulation shall be subject to the approval of the Board. Respondent acknowledges that she shall not be permitted to withdraw from this Stipulation unless it is rejected by the Board. Respondent understands and agrees that Board staff and counsel for Complainant may communicate directly regarding this Stipulation, without notice to or participation by Respondent or her attorney. If the Board fails to adopt this Stipulation as its Order, the Stipulation shall be of no force or effect, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action in this matter by virtue of its consideration of this Stipulation.

10. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Settlement and Disciplinary Order, including Portable Document Format (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

11. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

A. PUBLIC REPRIMAND

IT IS HEREBY ORDERED THAT respondent Anjum Iona Usman, M.D., as holder of Physician's and Surgeon's Certificate No. G89335, shall be and hereby is **publicly reprimanded** pursuant to Business and Professions Code section 2227. This Public Reprimand is issued as a result of action undertaken by the Illinois Department of Financial and Professional Regulation Division of Professional Regulation:

> On December 24, 2014, a Consent Order was issued regarding Respondent's license to practice medicine in Illinois. The Consent Order was based on allegations that in her treatment of pediatric patients for symptoms associated with autism, Respondent: failed to disclose her financial interest in a treatment she recommended (hyperbaric chamber oxygen therapy) and the compounding of medications that she prescribed to patients; failed to keep adequate medical records; and, failed to obtain informed consent for certain treatments, including chelation therapy. Under the terms of the Consent Order, Respondent's Illinois license was placed on indefinite probation for a minimum of one year. Respondent was required to take continuing medical education in proper record

keeping and documentation, professional responsibility and medical ethics. She was required to submit patient charts for review of her record keeping and charting of patient treatment, and to pay a fine.

B. Professionalism Program (Ethics Course)

Within 60 calendar days of the effective date of this Decision, Respondent shall enroll in a professionalism program, that meets the requirements of Title 16, California Code of Regulations (CAR) section 1358. Respondent shall participate in and successfully complete that program. Respondent shall provide any information and documents that the program may deem pertinent. Respondent shall successfully complete the classroom component of the program not later than six (6) months after Respondent's initial enrollment, and the longitudinal component of the program not later than the time specified by the program, but no later than one (1) year after attending the classroom component. The professionalism program shall be at Respondent's expense and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of licensure. A professionalism program taken after the acts that gave rise to the charges in the Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board or its designee, be accepted towards the fulfillment of this condition if the program would have been approved by the Board or its designee had the program been taken after the effective date of this Decision.

Respondent shall submit a certification of successful completion to the Board or its designee not later than 15 calendar days after successfully completing the program or not later than 15 calendar days after the effective date of the Decision, whichever is later. If Respondent fails to enroll, participate in, or successfully complete the professionalism program within the designated time period, Respondent shall receive a notification from the Board or its designee to cease the practice of medicine within three (3) calendar days after being so notified. Respondent shall not resume the practice of medicine until he has completed the professionalism program.

Failure to enroll, participate in, or successfully complete the professionalism program within the designated time period shall constitute unprofessional conduct and grounds for further disciplinary action.

ACCEPTANCE

I have read the foregoing Stipulated Settlement and Disciplinary Order for Public Reprimand in its entirety. I fully understand the terms of the Stipulation and their legal significance and the consequences of signing the Stipulated Settlement and Disciplinary Order for Public Reprimand, and I agree to this Stipulation.

DATED: 1-20-16

Anjum Iona Usman, MD

ANJUM IONA USMAN, M.D.
Respondent

APPROVAL

I have read and fully discussed with respondent Anjum Iona Usman, M.D. the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order for Public Reprimand. I approve its form and content.

DATED: Jan. 20, 2016

HENRY LEWIN
Law Offices of Lewin & Levin
Attorneys for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order for Public Reprimand is hereby respectfully submitted for consideration by the Medical Board of California.

Dated: January 21, 2016

KAMALA D. HARRIS
Attorney General of California

JANE ZACK SIMON
Supervising Deputy Attorney General
Attorneys for Complainant

EXHIBIT A

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO June 1 20 15
BY R. FIDDAUS ANALYST

KAMALA D. HARRIS
Attorney General of California
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Attorneys for Complainant

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: **ANJUM IONA USMAN, M.D.** 603 E. Deihl Road #135 Naperville, IL 60563 Physician's and Surgeon's Certificate No. G89335 Respondent.	Case No. 800-2015-011121 **A C C U S A T I O N**

The Complainant alleges:

1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board of California, Department of Consumer Affairs, and brings this Accusation solely in her official capacity.

2. On March 27, 2013, Physician's and Surgeon's Certificate No. G89335 was issued by the Medical Board of California to Anjum Iona Usman, M.D. (Respondent.) The certificate is renewed and current with an expiration date of June 30, 2016.

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JURISDICTION

3. This Accusation is brought before the Medical Board of California (Board) under the authority of the following sections of the California Business and Professions Code (Code) and/or other relevant statutory enactment:

A. Section 2227 of the Code provides in part that the Board may revoke, suspend for a period not to exceed one year, or place on probation, the license of any licensee who has been found guilty under the Medical Practice Act, and may recover the costs of probation monitoring.

B. Section 2305 of the Code provides, in part, that the revocation, suspension, or other discipline, restriction or limitation imposed by another state upon a license to practice medicine issued by that state, or the revocation, suspension, or restriction of the authority to practice medicine by any agency of the federal government, that would have been grounds for discipline in California under the Medical Practice Act, constitutes grounds for discipline for unprofessional conduct.

C. Section 141 of the Code provides:

> "(a) For any licensee holding a license issued by a board under the jurisdiction of a department, a disciplinary action taken by another state, by any agency of the federal government, or by another country for any act substantially related to the practice regulated by the California license, may be a ground for disciplinary action by the respective state licensing board. A certified copy of the record of the disciplinary action taken against the licensee by another state, an agency of the federal government, or by another country shall be conclusive evidence of the events related therein.
>
> "(b) Nothing in this section shall preclude a board from applying a specific statutory provision in the licensing act administered by the board that provides for discipline based upon a disciplinary action taken against the licensee by another state, an agency of the federal government, or another country."

FIRST CAUSE FOR DISCIPLINE

(Discipline, Restriction, or Limitation Imposed by Another State)

4. On December 24, 2014, the Illinois Department of Financial and Professional Regulation Division of Professional Regulation (Illinois Department) issued a Consent Order regarding Respondent's license to practice medicine in Illinois. The Consent Order was based on

allegations that in her treatment of pediatric patients for symptoms associated with autism, Respondent failed to disclose her financial interest in a treatment she recommended (hyperbaric chamber oxygen therapy) and the compounding of medications that she prescribed to patients; failed to keep adequate medical records; and, failed to obtain informed consent for certain treatments, including chelation therapy. Under the terms of the Consent Order, Respondent's Illinois license was placed on indefinite probation for a minimum of one year. Respondent was required to take continuing medical education in proper record keeping and documentation, professional responsibility and medical ethics. She was required to submit patient charts for review of her record keeping and charting of patient treatment, and to pay a fine. A copy of the Consent Order issued by the Illinois Department is attached as Exhibit A.

5. Respondent's conduct and the action of the Illinois Department of Financial and Professional Regulation Division of Professional Regulation as set forth in paragraph 4, above, constitutes cause for discipline pursuant to sections 2305 and/or 141 of the Code.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board issue a decision:

1. Revoking or suspending Physician's and Surgeon's Certificate Number G89335 issued to respondent Anjum Iona Usman, M.D.;

2. Revoking, suspending or denying approval of Respondent's authority to supervise physician assistants;

3. Ordering Respondent, if placed on probation, to pay the costs of probation monitoring; and

4. Taking such other and further action as the Board deems necessary and proper.

DATED: June 1, 2015

KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California

Complainant

EXHIBIT A

STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois,	Complainant,	)
v.		) No. 2009-04994
ANJUM I. USMAN, M.D., License No. 036.083420,	Respondent.	) concurrent with) 2011-11474

CONSENT ORDER

The Department of Financial and Professional Regulation of the State of Illinois, Division of Professional Regulation by Laura E. Forester, Chief of Medical Prosecutions, and Anjum I. Usman, M.D., Respondent, by and through her attorney Jeff Levens, hereby agree to the following:

STIPULATIONS

Anjum I. Usman, M.D., (hereinafter "Respondent").presently is the holder of a Certificate of Registration as a Physician and Surgeon in the State of Illinois, License No. 036.083420 issued by the Division of Professional Regulation of the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois (hereinafter the "Department"). Said license is presently in active status. At all times material to the matter set forth in this Consent Order, the Department had jurisdiction over the subject matter and parties herein.

Information has come to the attention of the Department that, in her treatment of pediatric patients for symptoms associated with autism, Respondent (1) failed to disclose her financial interest in (a) treatment recommended by Respondent (hyperbaric chamber

oxygen therapy) and (b) the compounding of medications that Respondent prescribed to patients; (2) failed to keep adequate medical records; and (3) failed to obtain informed consent on certain treatments, including chelation therapy.

On October 16, 2013, an Informal Conference was held at the Department's Chicago office. Present on behalf of the Department were Vladimir Lozovskiy, Staff Attorney, Laura Forester, Chief of Medical Prosecutions, and Deputy Medical Coordinators Dr. John Zander and Dr. Joseph Fojtik. Present on behalf of the Medical Disciplinary Board were Dr. Ronald Johnson, Grace Newton, and Dr. Richard Fay. Respondent appeared in person along with her attorney, Jeff Levens.

The allegation(s) as set forth herein, if proven to be true, would constitute grounds for the Department to revoke, suspend, or otherwise discipline Respondent's license as a Physician and Surgeon License on the authority of 225 ILCS 60/22(A)(5).

Respondent has been advised of the right to a hearing on the Department's charges, the right to contest any charges brought, the right to counsel and the right to Administrative Review of any Order resulting from a hearing. Respondent knowingly waives each of these rights, as well as any right to administrative review of this Consent Order. Respondent has freely and willfully entered into this Consent Order without any threat or coercion by any person. Respondent has not relied on any statements or promises made by or on behalf of the Department other than those specifically set forth in writing herein. Respondent neither admits nor denies the allegations and accepts the following terms and conditions in resolution thereof.

Respondent and the Department have agreed, in order to resolve this matter, that Respondent be permitted to enter into a Consent Order with the Department, providing

for the imposition of disciplinary measures which are fair and equitable under the circumstances and which are consistent with the best interests of the people of the State of Illinois.

CONDITIONS

WHEREFORE, the Department, through Laura E. Forester, Chief of Medical Prosecutions, and Anjum I. Usman, M.D., Respondent, through her attorney Jeff Levens, hereby agree to the following:

A. Respondent's Physician and Surgeon License, No. 036-083420, shall be placed on indefinite probation for a minimum of one (1) year. Respondent shall notify the Board upon completion of the conditions set forth in this Order at which time an informal conference shall take place within thirty (30) days.

B. Respondent shall take the following Continuing Medical Education (CMEs) within one (1) year of the approval of this agreed order: (1) ten (10) CMEs in proper record keeping and documentation, and (2) ten (10) CMEs in professional responsibility and medical ethics. These CMEs shall be over and above those mandated to retain licensure.

C. During the period of probation, Respondent shall submit ten (10) active patient charts on a quarterly basis to Dr. Robert Charles Dumont (Illinois medical license number 036.100616), a member of the faculty of the Integrative Medicine Department of Northwestern University School of Medicine, for review and assessment of her recordkeeping and charting of patient treatment.

D. During the period of probation, Respondent shall provide the Department with quarterly reports which include: (i) her current work and residential addresses and contact telephone number; and (ii) the report from Dr. Dumont regarding his review of ten (10) patient charts to be obtained, reviewed and assessed for proper record keeping and charting of patient treatment.

E. Respondent shall notify the Department's Probation Unit in writing of any change in employment, home address and/or telephone number within ten (10) days;

F. All reports required by this Consent Order shall be sent to the Probation Compliance Unit of the Division of Professional Regulation at 9511 W. Harrison Street, Suite A171, Des Plaines, IL 60016 on quarterly basis;

G. Respondent shall pay a fine in the amount of ten thousand dollars ($10,000.00) to the Illinois Department of Financial and Professional Regulation within one (1) year from the effective date of this Order.

H. The fine shall be submitted to the Department pursuant to this Consent Order and shall be sent to the following address:

Illinois Department of Financial and Professional Regulation
SSC - Accounts Receivable Section – Fines
320 W. Washington Rm 344
Springfield, IL 62791-7086

In the event that Respondent fails to pay the fine, and the Department is forced to initiate a collection effort to retrieve the fine, the Respondent will be responsible for all costs and fees incurred by the collection process.

I. Respondent agrees that if she violates any condition set forth in this agreement, the Department shall have the right to file a complaint based on said violation and seek disciplinary action based thereon.

J. This Consent Order shall become effective upon signing and approval by the Director of the Department.

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
of the State of Illinois

12/8/14
DATE

Laura E. Forester
Chief of Medical Prosecutions

12-4-14
DATE

Anjum I. Usman, MD
Anjum I. Usman, M.D.
Respondent

12/5/14
DATE

Jeff Levens
Attorney for Respondent

17 Dec 2014
DATE

Member, Illinois Medical Disciplinary Board

The foregoing Consent Order is approved in full.

DATED THIS 24th day of December, 2014.

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois;
MANUEL FLORES, ACTING SECRETARY
DIVISION OF PROFESSIONAL REGULATION

JAY STEWART
Director of Professional Regulation

REF: License No. 036.083420
Case Nos. 2011-11474 and 2009-04994