#### COMMONWEALTH OF MASSACHUSETTS

Middlesex, ss.		Board of Registration in Medicine
		Adjudicatory Case No. 2024-070
In the Matter of	)	
ROBERT T. DUNN, 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 violations for which a licensee may be sanctioned by the Board. The Board therefore alleges that Robert T. Dunn, 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. 20-108.

### Biographical Information

1. The Respondent graduated from the University of Chicago Pritzker School of Medicine in 1992 and has been licensed to practice medicine in Massachusetts under license number 159416 since 1999. He is board-certified in psychiatry.

### **Factual Allegations**

- 2. On August 11, 2019, at approximately 4:22pm, the Respondent drove his Jeep in the wrong direction on JFK Street a one-way northbound street in Cambridge, MA.
  - 3. The Respondent was stopped by a Cambridge Police Officer.

- 4. While the Officer attempted to clear some traffic, the Respondent attempted to inch his Jeep around the cruiser. The Officer ordered the Respondent to stop and exit the vehicle; the Respondent complied.
- 5. The Officer observed multiple indicators of impairment, including slurred speech, glassy eyes, lack of balance, and the inability to follow directions.
- 6. The Cambridge Police located a knotted baggie that contained cocaine in the front gear box of the Respondent's Jeep.
  - 7. The Respondent was arrested.
- 8. On August 12, 2019, the Respondent was arraigned in the Cambridge District Court and charged with possession of a class B drug in violation of M.G.L. ch. 94C, § 34, and negligent operation of a motor vehicle, in violation of M.G.L. ch. 90, § 24(2)(a), along with various civil infractions.
- 9. On March 12, 2020, the Respondent executed a voluntary agreement to not practice medicine.
- 10. On December 15, 2021, the Respondent admitted to sufficient facts for a finding of guilt on both the possession and negligent operation charges, received a continuation without a finding and a six-month period of probation.
  - 11. On June 13, 2022, the Respondent successfully completed probation.
  - 12. G.L. c. 4, § 7(26)(a)
  - 13. G.L. c. 4, § 7(26)(a)

## Legal Basis for Proposed Relief

A. Pursuant to Levy v. Board of Registration in Medicine, 378 Mass. 519 (1979) and Raymond v. Board of Registration in Medicine, 387 Mass. 708 (1982), the Board may discipline a physician upon proof satisfactory to a majority of the Board that said physician lacks good moral character and has 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 <u>ORDERED</u> 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,

Booker T. Bush, M.D.

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# Board Chair

Date: December 31, 2024