

The Council of the College of Physicians and Surgeons directs that, pursuant to section 47.5 of **The Medical Profession Act, 1981**, the Discipline Committee hear the following charges against Dr. Thomas Chambers:

1. You Dr. Thomas Chambers are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of section 46 (k), and/or section 46(l), and/or section 46(o), and/or section 46(p) of **The Medical Profession Act, 1981**, and/or bylaw 51(2)(d) of the bylaws of the College of Physicians and Surgeons. Particulars of this conduct are that you caused the medical clinic with which you were then associated, Broad Street Medical Clinic to submit claims to the Medical Services Plan to which you were not entitled in accordance with the payment schedule for insured services.

The evidence that will be lead in support of this charge is that you caused Broad Street Medical Clinic to submit claims for services that you claimed to have performed for the patients identified in Appendix "A" to these charges when:

- a) you did not provide any examination of or treatment to some or all of the patients in connection with the services billed; and/or,
 - b) you did not perform some or all of the necessary services to support the claims which were submitted.
2. You Dr. Thomas Chambers are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of section 46(o), and/or section 46(p) of **The Medical Profession Act, 1981**, and/or bylaw 51(2)(g) of the bylaws of the College of Physicians and Surgeons. Particulars of this conduct are that you prepared records in connection with some or all of the patients referred to in Charge 1 that were false, inaccurate and/or misleading.

The evidence that will be lead in support of this charge will be that:

- a) you prepared records for some or all of the patients who you purportedly treated on September 26, 2007, October 12, 2007, October 25, 2007, October 29, 2007 and November 6, 2007 as set out in Appendix "A" to these charges; and,
- b) you did not provide any examination of or treatment to some or all of the patients in connection with the records that you prepared; and/or,
- c) the records that you prepared were not an accurate reflection of the examination and treatment that you provided;