

**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
BUREAU OF HEALTHCARE SYSTEMS**

In re: Robert Lucas, P.A.

Petition No. 2002-1209-023-007

STATEMENT OF CHARGES

Pursuant to the General Statutes of Connecticut, §§19a-10, 19a-11, and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Robert Lucas:

COUNT ONE

1. Robert Lucas of Norwalk (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut physician assistant license number 000371. Respondent has at no time been licensed in Connecticut to practice medicine and surgery.
2. During at least 2002, respondent engaged in the unlicensed practice of medicine when he administered botox and collagen injections to patients at a beauty spa in Darien.
3. During at least 2002, respondent engaged in the unlicensed practice of medicine when he practiced without a written protocol and without the required supervision at a physician's office.
4. The above-described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, including but not limited to §20-9(a).

COUNT TWO

5. Paragraphs one through three are incorporated herein by reference as if set forth in full.
6. During at least 2002, respondent practiced as a physician assistant without a written protocol with at least one of his registered supervising physicians.
7. During at least 2002, respondent failed to provide patient charts and records for review on a regular basis to at least one of his registered supervising physicians.
8. During at least 2002, respondent failed to maintain proper patient charts and records.
9. During at least 2002, respondent practiced under the supervision of two physicians who were not registered with the Department as supervising physicians.

10. The above-described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, including but not limited to:

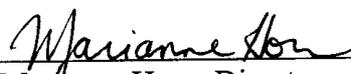
- a. §20-12c(a);
- b. §20-12c(b);
- c. §20-12d(a);
- d. §20-12d(c); and/or
- e. §20-12f.

THEREFORE, the Department prays that:

The Connecticut Medical Examining Board, as authorized by the General Statutes of Connecticut §19a-11, issue an order that respondent cease and desist in the unlicensed practice of medicine; and/or,

as authorized by §§19a-17 and 20-12f, revoke or order other disciplinary action against the physician assistant license of Robert Lucas as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 28th day of May, 2004.



Marianne Horn, Director
Division of Health Systems Regulation
Bureau of Healthcare Systems