

1. You Dr. Russell Knaus 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** S.S. 1980-81 c. M-10.1 and/or Bylaw 6.1(b)(ix), particulars whereof are that you failed to maintain the standards of the profession in your prescribing of desiccated thyroid to your patients.

The evidence which will be led in support of this particular will include that:

- a) You prescribed desiccated thyroid for S.K. without an appropriate clinical and/or laboratory assessment;
- b) You prescribed desiccated thyroid for S.K. without an appropriate clinical indication for the prescription;
- c) You prescribed desiccated thyroid for J.K. despite a normal TSH value of 0.19;
- d) You prescribed desiccated thyroid for J.K. without preparing a clinical record pertaining to your prescribing;
- e) You prescribed desiccated thyroid for T.K. without an appropriate clinical indication for the prescription;
- f) You prescribed desiccated thyroid for T.K. despite a previously normal thyroid test;
- g) You prescribed desiccated thyroid for G.K. without preparing a clinical record pertaining to your prescribing;
- h) You prescribed desiccated thyroid for G.K. without an appropriate clinical and/or laboratory assessment;
- i) You prescribed desiccated thyroid for T.K. without an appropriate clinical and/or laboratory assessment;
- j) You prescribed desiccated thyroid for T.K. without an appropriate clinical indication for the prescription;
- k) You prescribed desiccated thyroid for T.K. without appropriate clinical and/or laboratory follow up;
- l) You prescribed desiccated thyroid for T.K. in a dosage larger than justified on a clinical basis;
- m) When T.K. was tested, her sTSH was less than 0.01, her FT3 was greater than 30.8 and FT4 was 60.9, indicative of thyrotoxicosis;
- n) You prescribed desiccated thyroid for L.K. without an appropriate clinical and/or laboratory assessment;
- o) You prescribed desiccated thyroid for L.K. without an appropriate clinical indication for the prescription;
- p) You prescribed desiccated thyroid for L.K. without an appropriate clinical and/or laboratory follow up;
- q) When T.K. was tested, her FT4 21.5, indicative of thyrotoxicosis;
- r) You prescribed desiccated thyroid for J.N. without an appropriate clinical and/or laboratory assessment;
- s) You prescribed desiccated thyroid for J.N. without an appropriate clinical indication for the prescription;
- t) You increased the dosage of desiccated thyroid which you prescribed for J.N. without appropriate clinical and/or laboratory assessment;
- u) When J.N. was tested, her sTSH less than 0.01, FT4 was 39.3 and FT3 was 24.7, indicative of thyrotoxicosis;
- v) You prescribed desiccated thyroid for K.G. without an appropriate clinical and/or laboratory assessment;
- w) You prescribed desiccated thyroid for K.G. without an appropriate clinical indication for the prescription;

- x) You continued to prescribe desiccated thyroid for K.G. despite normal thyroid indices;
- y) You increased the dosage of desiccated thyroid which you prescribed for K.G. without appropriate clinical and/or laboratory assessment;
- z) You prescribed desiccated thyroid to K.G. in a quantity that resulted in thyrotoxicosis and cardiac collapse.
- aa) You prescribed desiccated thyroid to K.G. in a quantity that resulted in a sTSH of less than 0.1, a FT4 reading of 17.1 and a FT3 reading of 7;
- bb) You prescribed desiccated thyroid for A.R. without an appropriate clinical assessment and/or despite normal thyroid indices;
- cc) You prescribed desiccated thyroid for A.R. without an appropriate clinical indication for the prescription;
- dd) You prescribed desiccated thyroid for C.R. without an appropriate clinical and/or laboratory assessment;
- ee) You prescribed desiccated thyroid for C.R. without an appropriate clinical indication for the prescription;
- ff) You prescribed desiccated thyroid for E.K. without an appropriate clinical and/or laboratory assessment;
- gg) You prescribed desiccated thyroid for E.K. without an appropriate clinical indication for the prescription;
- hh) You prescribed desiccated thyroid for M.J. without an appropriate clinical assessment and/or despite normal thyroid indices;
- ii) You prescribed desiccated thyroid for M.J. without an appropriate clinical indication for the prescription;
- jj) You increased the dosage of desiccated thyroid which you prescribed for M.J. without appropriate clinical and/or laboratory assessment;
- kk) You prescribed desiccated thyroid for S.A. without an appropriate clinical assessment and/or despite normal thyroid indices;
- ll) You prescribed desiccated thyroid for S.A. without an appropriate clinical indication for the prescription;
- mm) You increased the dosage of desiccated thyroid which you prescribed for S.A. without appropriate clinical and/or laboratory assessment;
- nn) You increased the dosage of desiccated thyroid which you prescribed for S.A. in February, 2009 despite a normal FT4 reading;
- oo) You prescribed desiccated thyroid for K.C. without an appropriate clinical and/or laboratory assessment;
- pp) You prescribed desiccated thyroid for K.C. without an appropriate clinical indication for the prescription;
- qq) You prescribed desiccated thyroid for K.C. in October, 2007 despite the fact that she had not been prescribed thyroid medication for some time and her thyroid indices were normal;
- rr) You increased the dosage of desiccated thyroid which you prescribed for K.C. without appropriate clinical and/or laboratory assessment;
- ss) You prescribed desiccated thyroid for A.K. without an appropriate clinical and/or laboratory assessment and/or despite a normal TSH level;
- tt) You prescribed desiccated thyroid for A.K. without an appropriate clinical indication for the prescription;
- uu) You increased the dosage of desiccated thyroid which you prescribed for A.K. without appropriate clinical and/or laboratory assessment;
- vv) You prescribed desiccated thyroid for A.K. in a dosage larger than justified on a clinical basis;
- ww) You continued to prescribe desiccated thyroid for A.K. after 19th of June, 2008 despite an FT4 reading of 23.9

- xx) You continued to prescribe desiccated thyroid for A.K. after August 19th, 2008, despite an FT4 reading of 30 and an FT3 reading of 24.
 - yy) You increased the dosage of desiccated thyroid which you prescribed for L.L. despite thyroid indices in the normal range;
 - zz) You increased the dosage of desiccated thyroid which you prescribed for L.L. without an appropriate clinical indication for the increase.
2. You Dr. Russell Knaus 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** S.S. 1980-81 c. M-10.1 and/or Bylaw 7.1(b) particulars whereof are that you treated one or more of J.K., T.K., S.K. and G.K. who were members of your immediate family when such treatment did not meet the conditions of paragraph 20 of the Code of Ethics.