

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. 200904994  
ANJUM I. USMAN, M.D. )  
License No.036083420, Respondent )

**COMPLAINT**

NOW COMES THE DIVISION OF PROFESSIONAL REGULATION of the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois (Department), by its Chief of Medical Prosecutions, Laura E. Forester, and as its Complaint against ANJUM I. USMAN, M.D., Respondent, complains as follows:

**FACTUAL ALLEGATIONS**

1. Respondent is presently the holder of a Certificate of Registration as a Physician and Surgeon in the State of Illinois, License Number 036083420, issued by the Department. Respondent's license is currently in active status.
2. That the Department has jurisdiction to investigate complaints and to bring this action pursuant to 20 ILCS 2105/2105-15 (a) (5) and 225 ILCS 60/36. (2009, as amended).
3. That at all times mentioned herein the Respondent practiced medicine as a Physician and Surgeon in the State of Illinois.
4. That on May 1, 2009, the Department received information alleging that Respondent treated patient AC, a minor, for presumed autism using a variety of alternative and unconventional medical treatments, resulting in AC receiving unnecessary and medically unwarranted treatment that may potentially result in permanent disabling injuries.
5. That at all times stated herein, Respondent was practicing as a Physician and Surgeon at True Health Medical Center located at 603 E. Diehl Road, Suite 135, Naperville, IL 60563.
6. That at all times stated herein, Respondent owned, operated and managed True Health Medical Center in Naperville, IL.

7. That AC was born on [REDACTED]
8. That on or about March 1, 2004, AC presented to Advocate Illinois Masonic Medical Center in Chicago, Illinois.
9. That on or about March 1, 2004, AC presented to Advocate Illinois Masonic Medical Center in Chicago, Illinois due to speech delay and atypical behaviors.
10. That upon AC's presentation to Advocate Illinois Masonic Medical Center in Chicago, Illinois, AC was diagnosed with mild to moderate level autism.
11. That on or about April 19, 2004, AC presented to True Health Medical Center in Naperville, Illinois due to language delay, hyperactivity, short attention span, teeth grinding and no boundaries.
12. That beginning on or about April 19, 2004, Respondent undertook to diagnose and treat AC.
13. That AC's medical records and/or other information gathered during the course of the Department's investigation indicated that at various times between April 19, 2004 and April 14, 2009, Respondent diagnosed AC with the following conditions and/or diagnoses:
  - a. Ca/Zn imbalance
  - b. Down Zn
  - c. Heavy metals toxicity
  - d. Dysbiosis
  - e. Abnormally high levels of aluminum, antimony, arsenic, cadmium, copper, lead, nickel, silver, tin, titanium and selenium
  - f. Yeast
14. That AC's medical records and/or other information gathered during the course of the Department's investigation indicated that at various times between April 19, 2004 and April 14, 2009, Respondent ordered and/or administered the following tests to AC:
  - a. MAP (Metabolic Analysis Profile)
  - b. Hair analysis
  - c. Provoked urine tests for toxic metals
  - d. Urine porphyrin tests
  - e. Parasites

15. That AC's medical records and/or other information gathered during the Department's investigation indicated that at various times between April 19, 2004 and April 14, 2009, Respondent prescribed and/or recommended the following treatments for AC:

- a. Dietary measures: casein-free, gluten-free, yogurt, noni, goji
- b. Vitamins, minerals and other dietary supplements: cod liver oil (omega 3), folic acid, Spectrum Support II, zinc, methyl B12, magnesium water, B6, cysteine, vitamin C, vitamin E, pycnogenol, molybdenum, selenium, calcium, CoQ10, Protinogold, vitamin K, vitamin D3, LiverTone, KidneyTone, Curcumin, Probiotics Gold, Td GSH
- c. Enzymes: HEnzyme, EnZyme-complete
- d. Antifungal drugs: Diuflucan, Nystatin
- e. Other substances: DMG, NDF, MVI Kirkman's, GABA, DMAE, CLO, activated charcoal, bentonite, ICG 2000, phosphatidyl choline, IgG
- f. Detoxification/chelation drugs: DMPS, CaEDTA, DMSA, NDF
- g. Hormones: Spironolactone, melatonin
- h. Hyperbaric oxygen
- i. Gluthathione

16. None of the treatments described above has been proven to influence the course of autism.

#### COUNT I

1 - 16. The Department realleges paragraphs 1 through 16 of the Factual Allegations as paragraphs 1 through 16 of Count I.

17. Hair analysis does not provide a basis for the diagnosis of heavy metal toxicity.

18. Provoked urine testing does not provide a basis for the diagnosis of heavy metal toxicity. The American College of Medical Toxicology has determined that provoked testing has not be scientifically validated, has no demonstrated benefit and may be harmful when used for assessing patients for metal poisoning.

19. Porphyrin testing does not provide a reliable basis for the diagnosis of heavy metal toxicity.

20. Although chelation therapy is FDA-approved for treating lead poisoning, it should not be used unless a non-provoked blood (not urine) test shows an extremely high level of lead.

21. Respondent did not obtain a confirmatory blood lead test or record any source of lead exposure.
22. The record contains no basis for concluding that chelation therapy was appropriate.
23. The record does not contain adequate informed consent for any of the prescribed nonstandard tests or treatments. The consent forms used did not accurately present the risks and/or benefits of tests and treatments. Although it mentioned experimental drug use, these were not administered as part of a proper experimental protocol.
24. The informed consent form states that chelation therapy “is considered controversial for the generalized treatment of chronic low or high level lead toxicity, mercury toxicity, or for other heavy metal toxicities, either acute or chronic.” This statement is misleading because there is a clear scientific consensus that it is inappropriate for treating lead toxicity without demonstrating that toxicity exists and that the level is very high.
25. Throughout the treatment period, Respondent made statements to AC’s mother that the prescribed treatments had positive clinical benefits for children with autism, despite the lack of empirical research supporting Respondent’s position.
26. The record does not document any reason why AC should have received unproven treatments.
27. Spironolactone, which is potentially dangerous, was prescribed without justification.
28. Despite a normal selenium level, Respondent repeatedly and unnecessarily prescribed selenium supplements and continued to do so even when AC eventually showed a high level.
29. That Respondent abused the physician/patient relationship by taking unfair advantage of a patient’s vulnerability in that Respondent utilized unproven drugs and medicine to treat AC, a pediatric patient diagnosed with autism.
30. That the foregoing acts and/or omissions of Respondent are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes (2002), Section 60/22(A)(20), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240(b)(1)(C), and (2)(C).

WHEREFORE, based on these allegations, the Department of Financial and Professional Regulation of the State of Illinois, by Laura E. Forester, its Chief of Medical Prosecutions, prays

that the Physician and Surgeon license of ANJUM I. USMAN, M.D., be revoked, suspended, placed on probation or otherwise disciplined.

**COUNT II**

- 1 – 16. The Department realleges paragraphs 1 through 16 of the Factual Allegations as paragraphs 1 through 16 of Count II.
- 17 – 28. The Department realleges paragraphs 17 through 28 of Count I as paragraphs 17 through 28 of Count II.
31. That Respondent engaged in unprofessional, unethical and/or dishonorable conduct in that Respondent provided medically unnecessary treatment to AC, failed to obtain informed consent for the medically unnecessary treatment of AC, failed to maintain appropriate medical records and/or charts for the care and treatment of AC, and failed to provide adequate treatment of AC:
  - a. Breached the responsibility owed to AC; and
  - b. Violated the standard of care owed to AC.
32. That the foregoing acts and/or omissions of Respondent are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes (2002), Section 60/22(A)(5), relying on the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code Title 68, Section 1285.240(a)(1)(A), (B), (E) and (F) and (2) (E).

WHEREFORE, based on these allegations, the Department of Financial and Professional Regulation of the State of Illinois, by Laura E. Forester, its Chief of Medical Prosecutions, prays that the Physician and Surgeon license of ANJUM I. USMAN, M.D., be revoked, suspended, placed on probation or otherwise disciplined.

**COUNT III**

- 1 – 16. The Department realleges paragraphs 1 through 16 of the Factual Allegations as paragraphs 1 through 16 of Count III.
- 17 – 28. The Department realleges paragraphs 17 through 28 of Count I as paragraphs 17 through 28 of Count III.
29. That between April 19, 2004 and April 14, 2009, Respondent repeatedly represented that the prescribed tests and treatments were appropriate for helping autistic children.

30. That Respondent made false or misleading statements regarding the efficacy or value of the medicine, treatment, or remedy prescribed by Respondent in the treatment of any disease or other condition of the body in that Respondent made false or misleading statements regarding the efficacy of chelation therapy in the treatment of autism.
31. That the foregoing acts and/or omissions of Respondent are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes (2002), Section 60/22(A)(10).

WHEREFORE, based on these allegations, the Department of Financial and Professional Regulation of the State of Illinois, by Laura E. Forester, its Chief of Medical Prosecutions, prays that the Physician and Surgeon license of ANJUM I. USMAN, M.D., be revoked, suspended, placed on probation or otherwise disciplined.

#### COUNT IV

- 1 - 16. The Department realleges paragraphs 1 through 16 of the Factual Allegations as paragraphs 1 through 16 of Count IV.
- 17 – 28. The Department realleges paragraphs 17 through 28 of Count I as paragraphs 17 through 28 of Count IV.
29. That Respondent failed to establish and maintain records of patient care and treatment as required by law in that Respondent failed to document the following for patient AC:
  - a. A coherent treatment plan;
  - b. Diagnoses supported by patient history, physical findings and/or laboratory tests;
  - c. Rationale or goals for the majority of prescribed treatments or documentation as to what treatments are intended for what purpose; and
  - d. Patient responses to prescribed treatments.
30. That the foregoing acts and/or omissions of Respondent are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes (2002), Section 60/22(A)(41).

WHEREFORE, based on these allegations, the Department of Financial and Professional Regulation of the State of Illinois, by Laura E. Forester, its Chief of Medical Prosecutions, prays that the Physician and Surgeon license of ANJUM I. USMAN, M.D., be revoked, suspended, placed on probation or otherwise disciplined.

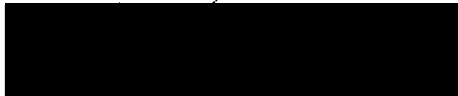
**COUNT V**

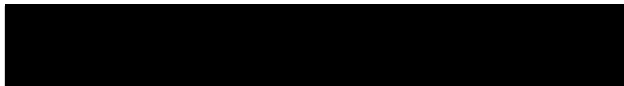
- 1 - 16. The Department realleges paragraphs 1 through 16 of the Factual Allegations as paragraphs 1 through 16 of Count V.
- 17 – 28. The Department realleges paragraphs 17 through 28 of Count I as paragraphs 17 through 28 of Count V.
29. That Respondent engaged in a pattern of practice or other behavior that demonstrates incapacity or incompetence to practice in that Respondent:
- a. Repeatedly prescribed and administered unproven and medically unnecessary treatments to AC despite the lack of empirical research demonstrating the effectiveness of the prescribed treatment plans; and
  - b. Demonstrated extreme departure from rational medical judgment in the care and treatment of AC.
30. That the foregoing acts and/or omissions of Respondent are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes (2002), Section 60/22(A)(26).

WHEREFORE, based on these allegations, the Department of Financial and Professional Regulation of the State of Illinois, by Laura E. Forester, its Chief of Medical Prosecutions, prays that the Physician and Surgeon license of ANJUM I. USMAN, M.D., be revoked, suspended, placed on probation or otherwise disciplined.

**DEPARTMENT OF FINANCIAL AND  
PROFESSIONAL REGULATION of the State of Illinois**

By:

  
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Laura E. Forester  
Chief of Medical Prosecutions



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