



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

RE: Paul Thomas, MD
Master Case No.: M2021-378
Document: Agreed Order

Regarding your request for information about the above-named practitioner; attached is a true and correct copy of the document on file with the State of Washington, Department of Health, Adjudicative Clerk Office. These records are considered Certified by the Department of Health.

Certain information may have been withheld pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld: **NONE**

If you have any questions or need additional information regarding the information that was withheld, please contact:

Customer Service Center
P.O. Box 47865
Olympia, WA 98504-7865
Phone: (360) 236-4700
Fax: (360) 586-2171

You may appeal the decision to withhold any information by writing to the Privacy Officer, Department of Health, P.O. Box 47890, Olympia, WA 98504-7890.

**STATE OF WASHINGTON
WASHINGTON MEDICAL COMMISSION**

In the Matter of the License to Practice
as a Physician and Surgeon of:

PAUL THOMAS, MD
License No. MD.MD.60353591

Respondent.

No. M2021-378

**STIPULATED FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND
AGREED ORDER**

The Washington Medical Commission (Commission), through Colleen Balatbat, Commission Staff Attorney, and Respondent, represented by counsel, Troy Bundy, stipulate and agree to the following.

1. PROCEDURAL STIPULATIONS

1.1 On February 11, 2022, the Commission issued a Statement of Charges against Respondent alleging a violation of RCW 18.130.180(5).

1.2 On May 16, 2022, the Commission and Respondent entered an Interim Stipulated Order which placed limitations on Respondent's license.

1.3 The Commission is prepared to proceed to a hearing on the allegations in the Statement of Charges.

1.4 Respondent has the right to defend against the allegations in the Statement of Charges by presenting evidence at a hearing.

1.5 The Commission has the authority to impose sanctions pursuant to RCW 18.130.160 if the allegations are proven at a hearing.

1.6 The parties agree to resolve this matter by means of this Stipulated Findings of Fact, Conclusions of Law, and Agreed Order (Agreed Order).

1.7 Respondent waives the opportunity for a hearing on the Statement of Charges if the Commission accepts this Agreed Order.

1.8 This Agreed Order is not binding unless it is accepted and signed by the Commission.

1.9 If the Commission accepts this Agreed Order, it will be reported to the National Practitioner Data Bank (45 CFR Part 60), the Federation of State Medical Boards' Physician Data Center, and elsewhere as required by law.

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1.10 This Agreed Order is a public document. It will be placed on the Department of Health's website, disseminated via the Commission's electronic mailing list, and disseminated according to the Uniform Disciplinary Act (Chapter 18.130 RCW). It may be disclosed to the public upon request pursuant to the Public Records Act (Chapter 42.56 RCW). It will remain part of Respondent's file according to the state's records retention law and cannot be expunged.

1.11 If the Commission rejects this Agreed Order, Respondent waives any objection to the participation at hearing of any Commission members who heard the Agreed Order presentation.

1.12 If the Commission accepts this Agreed Order, it will supersede the Interim Stipulated Order entered on May 6, 2022.

2. FINDINGS OF FACT

Respondent and the Commission stipulate to the following findings of fact:

2.1 On August 2, 2013, the state of Washington issued Respondent a license to practice as a physician and surgeon. Respondent's license is currently active.

2.2 On or about June 3, 2021, an Interim Stipulated Order was filed with the Oregon Medical Board and signed by Respondent on June 2, 2021. The Interim Order required Respondent to comply with the following:

2.2a Respondent's practice is limited to patients requiring acute care.

2.2b Respondent must not engage in consultations with parents or patients relating to vaccination protocols, questions, issues, or recommendations.

2.2c Respondent must not perform any research involving patient care.

2.3 On or about October 6, 2022, a Stipulated Order was filed with the Oregon Medical Board and signed by Respondent indicating that Respondent agreed to surrender his Oregon medical license.

3. CONCLUSIONS OF LAW

The Commission hereby enters the following Conclusions of Law:

3.1 The Commission has jurisdiction over Respondent and over the subject matter of this proceeding.

3.2 Respondent has committed unprofessional conduct in violation of RCW 18.130.180(5).

3.3 The above violations provide grounds for imposing sanctions under RCW 18.130.160.

4. AGREED ORDER

Based on the Findings of Fact and Conclusions of Law, Respondent agrees to entry of the following Agreed Order:

4.1 **Indefinite Suspension.** Respondent's license to practice as a physician and surgeon in the state of Washington is **INDEFINITELY SUSPENDED**.

4.2 **Reinstatement.** Respondent may petition for reinstatement pursuant to RCW 18.130.150 and only after reinstatement of his Oregon medical license. The Commission may agree to an order of reinstatement. If the Commission does not agree, a hearing may be held on the petition. Any order of reinstatement based on agreement or following a hearing may impose any terms and conditions listed in RCW 18.130.160 as deemed necessary by the Commission to protect the public and/or rehabilitate Respondent's practice.

4.3 **Demographic Census.** Washington law requires physicians and physician assistants to complete a demographic census with their license renewal. RCW 18.71.080(1)(b) and 18.71A.020(4)(b). Respondent must submit a completed demographic census to the Commission within **thirty (30) days** of the effective date of this Agreed Order, or at the time of renewal, whichever comes first. The demographic census can be found here: can be found here:

<https://wmc.wa.gov/licensing/renewals/demographic-census>.

4.4 **Self-Reporting.** Respondent shall report in writing, by email to medical.compliance@wmc.wa.gov, within thirty (30) days of the occurrence of any of the following events:

- a. Entry into any formal or informal agreement or order or issuance of any order, letter of concern, or reprimand with or by any healthcare-related license for the Respondent in another state;

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- b. Denial, restriction, suspension or revocation of privileges for the Respondent in any healthcare facility;
- c. Any felony or gross misdemeanor charge against the Respondent; and
- d. The filing of a complaint in superior court or federal district court against Respondent alleging negligence or request for mediation pursuant to chapter 7.70 RCW.

This requirement supplements and does not supersede the reporting obligations imposed by WAC 246-16-230.

4.5 **Obey Laws.** Respondent must obey all federal, state and local laws and all administrative rules governing the practice of the profession in Washington.

4.6 **Costs.** Respondent must assume all costs of complying with this Agreed Order.

4.7 **Violations.** If Respondent violates any provision of this Agreed Order in any respect, the Commission may initiate further action against Respondent's license.

4.8 **Change of Address or Name.** Respondent must inform the Commission and Adjudicative Clerk Office in writing, of changes in his residential and/or business address and/or his name within thirty (30) days of such change.

4.9 **Effective Date.** The effective date of this Agreed Order is the date the Adjudicative Clerk Office places the signed Agreed Order into the U.S. mail. If required, Respondent shall not submit any fees or compliance documents until after the effective of this Agreed Order.

5. COMPLIANCE WITH SANCTION RULES

The Commission applies WAC 246-16-800, *et seq.*, to determine appropriate sanctions. There is no sanction schedule that applies to this case. WAC 246 16-800 (2)(d) provides that if the conduct is not described in a schedule, the disciplining authority will use its judgment to determine appropriate sanctions. The ultimate duration of this Agreed Order is undetermined. It is uncertain when, or if, Respondent will be granted reinstatement of his Oregon medical license.

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6. FAILURE TO COMPLY

Protection of the public requires practice under the terms and conditions imposed in this Agreed Order. Failure to comply with the terms and conditions of this Agreed Order may result in further action on Respondent's license after a show cause hearing. If Respondent fails to comply with the terms and conditions of this Agreed Order, the Commission may hold a hearing to require Respondent to show cause why the license should not be revoked. Alternatively, the Commission may bring additional charges of unprofessional conduct under RCW 18.130.180(9). In either case, Respondent will be afforded notice and an opportunity for a hearing on the issue of non-compliance.

7. RESPONDENT'S ACCEPTANCE

I, PAUL THOMAS, MD, Respondent, certify that I have read this Agreed Order in its entirety; that my counsel of record, TROY BUNDY, has fully explained the legal significance and consequence of it; that I fully understand and agree to all of it; and that it may be presented to the Commission without my appearance. If the Commission accepts the Agreed Order, I understand that I will receive a signed copy.



PAUL THOMAS, MD
RESPONDENT

Feb. 17, 2023
DATE



TROY S. BUNDY, WSBA NO. 33330
ATTORNEY FOR RESPONDENT


2.17.2023
DATE

8. COMMISSION'S ACCEPTANCE AND ORDER

The Commission accepts and enters this Stipulated Findings of Fact, Conclusions of Law and Agreed Order.

DATED: 3/2/2023

STATE OF WASHINGTON
WASHINGTON MEDICAL COMMISSION



PANEL CHAIR

PRESENTED BY:



COLLEEN BALATBAT, WSBA NO. 48084
COMMISSION STAFF ATTORNEY