

**BEFORE THE IOWA BOARD OF MEDICINE**

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**IN THE MATTER OF THE STATEMENT OF CHARGES AGAINST  
ROBERT F. HALL, M.D., RESPONDENT**

**FILE No. 02-14-211**

\*\*\*\*\*

**STATEMENT OF CHARGES and SETTLEMENT AGREEMENT  
(Combined)**

\*\*\*\*\*

COMES NOW the Iowa Board of Medicine (Board) and Robert F. Hall, M.D., (Respondent), on May 15, 2015, and pursuant to Iowa Code sections 17A.10(2) and 272C.3(4) and 653 IAC 25.3, enter into this combined Statement of Charges and Settlement Agreement to resolve this matter.

**STATEMENT OF CHARGES**

1. Respondent was issued Iowa medical license no. 32934 on May 26, 1999.
2. Respondent's Iowa medical license is active and will next expire on March 1, 2015.
3. The Board has jurisdiction in this matter pursuant to Iowa Code chapters 147, 148 and 272C.

## COUNT I

4. **Discipline by Another Licensing Authority:** Respondent is charged pursuant to Iowa Code section 148.6(2)(d) and 653 IAC 23.1(1) with having a license to practice medicine and surgery disciplined by a licensing authority of another state.

### STATEMENT OF THE MATTERS ASSERTED

5. **Practice Setting:** Respondent is an Iowa-licensed physician who practices orthopedic surgery in McHenry, Illinois.

6. **Illinois Disciplinary Action:** On March 10, 2014, Respondent was disciplined by the Illinois Department of Financial and Professional Regulation (Illinois Board). The Illinois Board charged Respondent with attempting to perform surgery on a patient's right ankle when the patient was scheduled to undergo surgery on the left ankle. Respondent recognized the error after the initial incision and immediately informed the patient and her family about the error. The patient chose to proceed with surgery on the left ankle. The Illinois Board issued Respondent a Reprimand for operating on the wrong ankle. See Attachment A.

### SETTLEMENT AGREEMENT

7. **CITATION AND WARNING:** Respondent is hereby **CITED** for being disciplined by the Illinois Board for operating on the wrong ankle in violation of the laws and rules governing the practice. Respondent is hereby **WARNED** that such practice in the future may result in further disciplinary action against his Iowa medical license.

8. **CORRECTIVE ACTION PLAN:** Prior to the Board's approval of this Order, Respondent shall submit a written corrective action plan to the Board for approval. The written corrective action plan shall describe the steps Respondent has taken to avoid such errors in the future.

9. Respondent voluntarily submits this Order to the Board for consideration.

10. Respondent agrees that the State's counsel may present this Order to the Board for consideration.

11. This Order constitutes the resolution of a contested case proceeding.

12. In the event Respondent violates or fails to comply with any of the terms or conditions of this Order, the Board may impose other license discipline as authorized in Iowa Code Chapters 148 and 272 and 653 IAC 23.

13. By entering into this Order, Respondent understands that he has a right to legal counsel in this matter, voluntarily waives any rights to a contested case hearing on the allegations contained in the Statement of Charges and waives any objections to the terms of this Order.

14. Respondent understands that by entering into this combined Statement of Charges and Settlement Agreement, Respondent cannot obtain a copy of the investigative file. Pursuant to Iowa Code section 272C.6(4), a copy of the investigative file may only be provided to a licensee after a Statement of Charges is filed but before the final resolution of those charges.

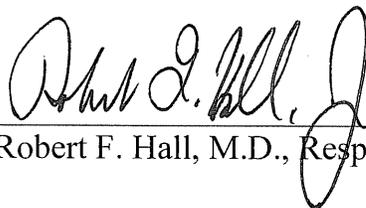
15. Respondent shall obey all federal, state and local laws, and all rules governing the practice of medicine in Iowa.

16. Respondent understands that the Board is required by Federal law to report this disciplinary action to the National Practitioner Data Bank.

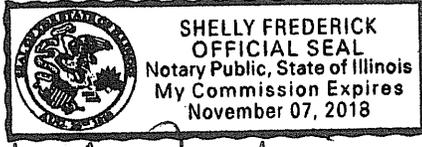
17. This Order becomes a public record available for inspection and copying upon execution in accordance with the requirements of Iowa Code Chapters 17A, 22 and 272C.

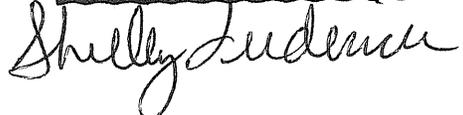
18. This Order is subject to approval by the Board. If the Board fails to approve this Order, it shall be of no force or effect to either party.

19. The Board's approval of this Order shall constitute a **Final Order** of the Board.

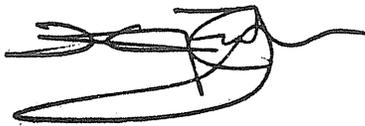
  
Robert F. Hall, M.D., Respondent

Subscribed and sworn to before me on 4/16, 2015.



Notary Public, State of Illinois. 

This Order is approved by the Board on May 15, 2015.

  
Hamed H. Tewfik, M.D., Chairman  
Iowa Board of Medicine  
400 SW 8<sup>th</sup> Street, Suite C  
Des Moines, Iowa 50309-4686

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. 2012-09564
	)	
ROBERT FRANCIS HALL JR, M.D.,	)	
License No. 036.045752,	)	
	)	Respondent.

**CONSENT ORDER**

The Department of Financial and Professional Regulation of the State of Illinois, Division of Professional Regulation by Fred Moore, Staff Attorney, and Robert Francis Hall Jr., M.D., Respondent, by and through his attorney Robert L. Larsen, hereby agree to the following:

**STIPULATIONS**

Robert Francis Hall Jr., M.D., (hereinafter "Respondent"), presently is the holder of a Certificate of Registration as a Physician and Surgeon in the State of Illinois, License No. 036.045752 issued by the Division of Professional Regulation of the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, (hereinafter the "Department"). Said license is presently in ACTIVE status. At all times material to the matter set forth in this Consent Order, the Department had jurisdiction over the subject matter and parties herein.

On or about September 24, 2012, the Department received information that Respondent performed a wrong site incision on patient D.P during surgery.

The allegation as set forth herein, if proven to be true, would constitute grounds for the Department to revoke, suspend, or otherwise discipline Respondent's license as a Physician and

Surgeon License on the authority of 225 ILCS 60/22(A)(5).

On January 15, 2013, an Informal Conference was held at the Department's Chicago office. The Department was represented by Staff Attorney, Fred Moore. The Medical Disciplinary Board was represented by Joseph Szokol, M.D., J.D., MBA. Respondent appeared in person and was represented by his attorney, Robert L. Larsen.

Respondent has been advised of the right to a hearing on the Department's charges, the right to contest any charges brought, and the right to administrative review of this Consent Order. Respondent knowingly waives each of these rights, as well as any right to administrative review of this Consent Order. Such waiver ceases if this Consent Order is rejected by either the Medical Disciplinary Board or the Director of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation.

Respondent and the Department have agreed, in order to resolve this matter, that Respondent be permitted to enter into a Consent Order with the Department, providing for the imposition of disciplinary measures which are fair and equitable under the circumstances and which are consistent with the best interests of the people of the State of Illinois.

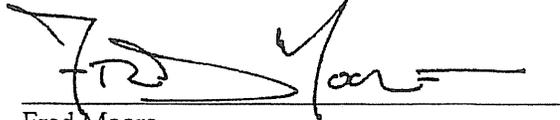
#### CONDITIONS

WHEREFORE, the Department, through Fred Moore, one of its attorneys, and Robert Francis Hall Jr., M.D., Respondent, through his attorney Robert L. Larsen, hereby agree to the following:

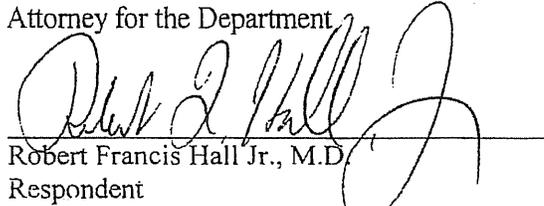
- A. Respondent's Physician and Surgeon License, No. 036.045752, shall be REPRIMANDED.
- B. This Consent Order shall become effective upon signing and approval by the Director of the Department.

DEPARTMENT OF FINANCIAL AND  
PROFESSIONAL REGULATION  
of the State of Illinois

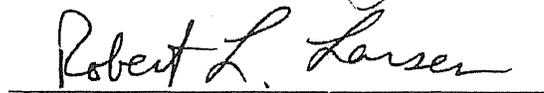
2/3/14  
DATE

  
Fred Moore  
Attorney for the Department

1/23/14  
DATE

  
Robert Francis Hall Jr., M.D.  
Respondent

1/27/14  
DATE

  
Robert L. Larsen  
Attorney for Respondent

19 Feb 2014  
DATE

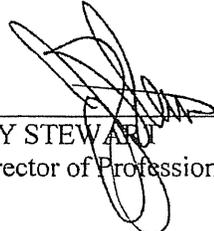
  
Member  
Illinois Medical Disciplinary Board

The foregoing Consent Order is approved in full.

DATED THIS 10th day of March, 2014

DEPARTMENT OF FINANCIAL AND  
PROFESSIONAL REGULATION  
of the State of Illinois;  
Manuel Flores, Acting Secretary

DIVISION OF PROFESSIONAL REGULATION

  
JAY STEWART  
Director of Professional Regulation

REF: Lic. No. 036.045752  
Case No. 2012-09564  
F. Moore