

From: Michael Langan mllangan1@me.com 
Subject: SJC-2015-0267
Date: December 7, 2015 at 4:24 PM
To: Bryan Bertram Bryan.Bertram@state.ma.us

Bryan,

I will be submitting the response to your opposition tomorrow morning. Attached is the Affidavit I spoke to you about regarding the “bad faith” of Ms. Stoller and below is part of what I will be submitting. It appears she also blocked Dr. Wilen’s letter from April 3, 2015 which addresses the monitoring (the absence of such documentation was your argument as to why the Board did not reinstate me). It was not only sent by e-mail and regular mail but brought with me to the April 16th hearing and hand delivered. It is quite clear she has been preventing such documents from getting to the Board and this explains everything since 2011. I know the Board is taking a “stand your ground” approach but I really do not see how this new information can be defended. This is obviously not “inadvertent.”

She needs to face disciplinary action and should be criminally charged. This is outrageous. Any thoughts?

-Michael

“Dr. Langan had in the past submitted a letter from Dr. Timothy Wilens, dated February 14, 2014, reporting to the Board that to the date of that letter Dr. Langan remained alcohol and substance free. *Id* at 158. But, that is not evidence that Dr. Langan remained abstinent in the months preceding the January 2015 Petition to the Board.” (page 8)

Mr. Bertram is correct. The February 14, 2014 report from Dr. Wilens does not cover the months preceding the January 2015 Petition to the Board. But the attached letters from Dr. Wilens dated April 24, 2014 and April 3, 2015 certainly do. The January 2015 Petition was heard at a Board Hearing April 16, 2015. The April 3, 2015 letter from Dr. Wilens states “I have monitored him (Langan) clinically and over the past year have been ordering and monitoring urine and saliva” toxicology tests and that he will continue to follow me. . This letter was written 13 days prior to the April 16th Board Hearing but is absent from the Administrative Record filed by the Board October 9, 2015. The letter was provided to Board attorney Deb Stoller by mail and e-mail. Additionally I hand delivered this letter and the documents supporting my January 20, 2015 Petition to Board attorney Tracy Ottina at the April 16th, 2015 Board Hearing.

The only possible explanation for the absence of this letter from the Administrative Record is that it was intentionally withheld. The fact that the absence of such documentation in the Board’s reasoning process was used to deny my Petition suggests the Board never saw it. The due process violations and

abuse of discretion exhibited here is severe but just the tip of the iceberg.



langan affidavit1.docx



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Timothy E. Wilens, M.D.
Associate Professor of Psychiatry
Harvard Medical School

April 3, 2015

Re. Michael Langan
DOB: 5/15/1962

To Whom It May Concern:

I am writing in regards to Michael Langan who is currently in my care in the outpatient clinics at Massachusetts General Hospital. Please note that I have followed Dr. Langan since I graduated