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CITIZENS COMMISSION ON HUMAN RIGHTS INTERNATIONAL

Established in 1969 by the Church of Scientology to investigate and expose psychiatric violations of human rights

Minnesota Board of Medical Practice
University Park Plaza
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December 20, 2012

C O M P L A I N T

Richard RePass, lic. #50953

Citizens Commission on Human Rights (CCHR) is filing the following report on behalf of Francesca RePass of Colorado, regarding incidents that occurred in 2004, 2005 and 2011 in which Dr. RePass filed reports with the county social services agency against Francesca, who is his sister. The first of these reports resulted in Francesca losing custody of her newborn daughter. All reports against her were subsequently determined to be unfounded. The 2004 and 2005 incidents occurred while Dr. RePass was in his second year of post-graduate medical training in Kentucky. Francesca RePass has lived in Colorado the entire time.

Francesca reported to CCHR that as of April 2004 she'd had no contact with Richard Repass in nine years. Francesca RePass was never Dr. RePass' patient.

In April 2004, Dr. RePass reported to Boulder County (Colorado) Social Services ("Social Services") that Francesca suffered from Narcissistic Personality Disorder. This was in the context of a report to the agency about alleged issues of safety for Francesca's then-as-yet unborn daughter, Elizabeth.

A Social Services "Assessment Summary" from Boulder County, dated April 22, 2004, states that "Richard Repass...was contacted and he says Fran suffers from Narcissistic Personality Disorder...."

TAB 1

A "Dependency or Neglect Intake/Petition" concerning Francesca's newborn daughter, Elizabeth, dated April 20, 2004, lists Richard RePass among the "Interested Relatives."

TAB 2

Francesca gave birth to Elizabeth on April 29, 2004. Two days later, Social Services removed Elizabeth from Francesca's custody and placed the infant in foster care.

An "Interstate Compact on the Placement of Children Request" dated July 28, 2004 shows that Dr. RePass was to adopt Elizabeth.

TAB 3

In an email sent to Francesca, dated July 5, 2004, Richard directly evaluates her as having Narcissistic Personality Disorder.

TAB 4

A fax dated April 8, 2005, written by Dr. Repass and addressed to "all legal, social and medical professionals involved with Francesca RePass..." states "I am writing to express our [Dr. RePass and two of his siblings] concerns about the future of our niece. It is our collective position that Francesca RePass should not have custody of her child, Elizabeth RePass. Elizabeth is at great risk for emotional suffering should she continue to live with and be subject to Francesca. We believe this is inevitable given my sister's psychiatric disorder." He goes on to state, "It is my personal and professional opinion that Francesca meets criteria to be diagnosed with a severe Narcissistic Personality Disorder." He continues on to state that she can't be helped and that harm to Elizabeth is inevitable.

TAB 5

A letter dated April 28, 2005 from Social Services caseworker Kati Lininger to Dr. RePass indicates that it is in response to a letter received from Dr. RePass inquiring how Elizabeth is doing. Lininger advises Dr. RePass that she cannot release information to him or discuss the case with him due to confidentiality and states that "There are not child protection concerns that would require a removal."

TAB 6

A Social Services "Contact Sheet" filled out by Kati Lininger indicates a telephone call she had with Dr. RePass on May 13, 2005, relative to her response to his earlier letter. The note states that "Mr. Repass said he wants all to know he and his family have a different stance than father [who wrote to Social Services in opposition to Dr. RePass' diagnosis and Elizabeth's removal]. Want [the letter] forwarded on to the courts and attorneys." Lininger advised Dr. RePass that that was not her job.

TAB 7

A Social Services "Referral/Assessment Summary" indicates that the agency received a referral with allegations that Francesca was displaying "erratic, delusional, and paranoid behavior which may be impacting her ability to safely care for her daughter." Francesca has advised CCHR that this report was filed by Dr. Repass (as well as her mother). The referral was closed as unfounded "because Fran appears to provide safe and appropriate parenting to her daughter...." The document further states that there had been a few other such referrals against her in 2006 and 2008 and all were closed as unfounded.

TAB 8

Though all allegations against Francesca were ultimately determined by Social Services to be unfounded, Dr. RePass' initial 2004 actions resulted in Elizabeth being removed from Francesca's custody and placed in foster care, where she was subsequently sexually assaulted by another foster child. Francesca sued the foster parents and Social Services and both cases were settled.

TAB 9

CCHR and Francesca RePass contend that the foregoing conduct by Dr. RePass constitutes violations of:

- Kentucky Revised Statutes § 311.595(9): Engaged in dishonorable, unethical, or unprofessional conduct of a character likely to deceive, defraud, or harm the public or any member thereof;
- Kentucky Revised Statutes § 311.595(10): Knowingly made, or caused to be made, or aided or abetted in the making of, a false statement in any document executed in connection with the practice of his profession;
- Kentucky Revised Statutes § 311.597(4): Conduct which is calculated or has the effect of bringing the medical profession into disrepute, including but not limited to any departure from, or failure to conform to the standards of acceptable and prevailing medical practice within the Commonwealth of Kentucky, and any departure from, or failure to conform to the principles of medical ethics of the American Medical Association or the code of ethics of the American Osteopathic Association. For the purposes of this subsection, actual injury to a patient need not be established.
- American Medical Association's Principles of Medical Ethics, precept I: A physician shall be dedicated to providing competent medical care, with compassion and respect for human dignity and rights. That Dr. RePass diagnosed someone who was not even his patient, in an attempt to have their child removed from their custody is lack of respect for Ms. RePass' rights, to say the least.
- It is likely that these violations would also constitute violations of Minnesota laws, rules and/or regulations, for which Dr. RePass could be disciplined.

CCHR and Francesca RePass respectfully request that the Minnesota Board of Medical Practice investigate this evidence and allegations.

Sincerely,

Steve Wagner
Public Advocacy Secretary