

**BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation)
Against:)
)
)
RAJINDER SINGH RANDHAWA, M.D.)
)
Physician's and Surgeon's)
Certificate No. C 50081)
)
Respondent)
_____)

Case No. 02-2013-232013

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on May 22, 2015.

IT IS SO ORDERED: April 24, 2015.

MEDICAL BOARD OF CALIFORNIA



Dev Gnanadev, M.D., Chair
Panel B

1 KAMALA D. HARRIS
Attorney General of California
2 ROBERT MCKIM BELL
Supervising Deputy Attorney General
3 JOHN S. GATSCHET
Deputy Attorney General
4 State Bar No. 244388
California Department of Justice
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Attorneys for Complainant
8

9 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 02-2013-232013

13 RAJINDER SINGH RANDHAWA, M.D.

OAH No. 2014060483

14 7720 Tennis Court.
15 Antelope, California 95843

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

16 Physician's and Surgeon's Certificate C 50081,
17 Respondent.
18

19
20 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties to the above-
21 entitled proceedings that the following matters are true:

22 PARTIES

23 1. Kimberly Kirchmeyer ("Complainant") is the Executive Director of the Medical
24 Board of California ("Board"). She brought this action solely in her official capacity and is
25 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
26 John S. Gatschet, Deputy Attorney General.

27 2. Respondent Rajinder Singh Randhawa, M.D. ("Respondent") is representing himself
28 in this proceeding and has chosen not to exercise his right to be represented by counsel.

1 3. On October 3, 1997, the Board issued Physician's and Surgeon's Certificate No. C
2 50081 to Respondent. That license expired on March 31, 2011. On April 1, 2011, Respondent's
3 license went into delinquent status. On April 23, 2011, Respondent renewed his delinquent
4 license. His license again expired on March 31, 2013. On April 1, 2013, Respondent's license
5 went into delinquent status. On May 11, 2013, Respondent renewed his delinquent license. His
6 license is currently in full force and effect and will expire on March 31, 2015, unless renewed.

7 JURISDICTION

8 4. Accusation No. 02-2013-232013 was filed before the Board, and is currently pending
9 against Respondent. The Accusation and all other statutorily required documents were properly
10 served on Respondent on April 2, 2014. Respondent timely filed a Notice of Defense contesting
11 the Accusation.

12 5. A copy of Accusation No. 02-2013-232013 is attached as Exhibit A and is
13 incorporated herein by reference.

14 ADVISEMENT AND WAIVERS

15 6. Respondent has carefully read, and understands the charges and allegations in
16 Accusation No. 02-2013-232013. Respondent has also carefully read, and understands the effects
17 of this Stipulated Settlement and Disciplinary Order.

18 7. Respondent is fully aware of his legal rights in this matter, including the right to a
19 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
20 his own expense; the right to confront and cross-examine the witnesses against him; the right to
21 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel
22 the attendance of witnesses and the production of documents; the right to reconsideration and
23 court review of an adverse decision; and all other rights accorded by the California
24 Administrative Procedure Act and other applicable laws.

25 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
26 every right set forth above.

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1 CULPABILITY

2 9. Respondent understands and agrees that the charges and allegations in Accusation
3 No. 02-2013-232013, if proven at a hearing, constitute cause for imposing discipline upon his
4 Physician's and Surgeon's Certificate.

5 10. For the purpose of resolving the Accusation without the expense and uncertainty of
6 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
7 basis for the charges in the Accusation, and that Respondent hereby gives up his right to contest
8 those charges.

9 11. Respondent agrees that if he ever petitions for early termination or modification of
10 probation, or if the Board ever petitions for revocation of probation, all of the charges, and
11 allegations contained in Accusation No. 02-2013-232013, shall be deemed true, correct, and fully
12 admitted by Respondent for purposes of that proceeding or any other licensing proceeding
13 involving respondent in the State of California.

14 12. Respondent agrees that his Physician's and Surgeon's Certificate is subject to
15 discipline and he agrees to be bound by the Board's probationary terms as set forth in the
16 Disciplinary Order below.

17 RESERVATION

18 13. The admissions made by Respondent herein are only for the purposes of this
19 proceeding, or any other proceedings in which the Medical Board of California or other
20 professional licensing agency is involved, and shall not be admissible in any other criminal or
21 civil proceeding.

22 CONTINGENCY

23 14. This stipulation shall be subject to approval by the Medical Board of California.
24 Respondent understands and agrees that counsel for Complainant and the staff of the Medical
25 Board of California may communicate directly with the Board regarding this stipulation and
26 settlement, without notice to or participation by Respondent. By signing the stipulation,
27 Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the
28 stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this

1 stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of
2 no force or effect, except for this paragraph, it shall be inadmissible in any legal action between
3 the parties, and the Board shall not be disqualified from further action by having considered this
4 matter.

5 15. The parties understand and agree that Portable Document Format (PDF) and facsimile
6 copies of this Stipulated Settlement and Disciplinary Order, including Portable Document Format
7 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

8 16. In consideration of the foregoing admissions and stipulations, the parties agree that
9 the Board may, without further notice or formal proceeding, issue and enter the following
10 Disciplinary Order:

11 **DISCIPLINARY ORDER**

12 **IT IS HEREBY ORDERED THAT** Physician's and Surgeon's Certificate No. C 50081
13 issued to Respondent Rajinder Singh Randhawa, M.D. is revoked. However, the revocation is
14 stayed and Respondent is placed on probation for five (5) years on the following terms and
15 conditions.

16 1. **COMMUNITY SERVICE - FREE SERVICES.** Within 60 calendar days of the
17 effective date of this Decision, Respondent shall submit to the Board or its designee for prior
18 approval a community service plan in which Respondent shall within the first 2 years of
19 probation, provide 100 hours of free services (e.g., medical or nonmedical) to a community or
20 non-profit organization. If the term of probation is designated for 2 years or less, the community
21 service hours must be completed not later than 6 months prior to the completion of probation.

22 Prior to engaging in any community service Respondent shall provide a true copy of the
23 Decision(s) to the chief of staff, director, office manager, program manager, officer, or the chief
24 executive officer at every community or non-profit organization where Respondent provides
25 community service and shall submit proof of compliance to the Board or its designee within 15
26 calendar days. This condition shall also apply to any change(s) in community service.

27 Community service performed prior to the effective date of the Decision shall not be
28 accepted in fulfillment of this condition.

1 2. PROFESSIONALISM PROGRAM (“ETHICS” COURSE). Within 60 calendar
2 days of the effective date of this Decision, Respondent shall enroll in a professionalism program,
3 that meets the requirements of Title 16, California Code of Regulations (C.C.R.) section 1358.
4 Respondent shall participate in and successfully complete that program. Respondent shall
5 provide any information and documents that the program may deem pertinent. Respondent shall
6 successfully complete the classroom component of the program not later than six (6) months after
7 Respondent’s initial enrollment, and the longitudinal component of the program not later than the
8 time specified by the program, but no later than one (1) year after attending the classroom
9 component. The professionalism program shall be at Respondent’s expense and shall be in
10 addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

11 A professionalism program taken after the acts that gave rise to the charges in the
12 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board
13 or its designee, be accepted towards the fulfillment of this condition if the program would have
14 been approved by the Board or its designee had the program been taken after the effective date of
15 this Decision.

16 Respondent shall submit a certification of successful completion to the Board or its
17 designee not later than 15 calendar days after successfully completing the program or not later
18 than 15 calendar days after the effective date of the Decision, whichever is later.

19 3. NOTIFICATION. Within seven (7) days of the effective date of this Decision, the
20 Respondent shall provide a true copy of this Decision and Accusation to the Chief of Staff or the
21 Chief Executive Officer at every hospital where privileges or membership are extended to
22 Respondent, at any other facility where Respondent engages in the practice of medicine,
23 including all physician and locum tenens registries or other similar agencies, and to the Chief
24 Executive Officer at every insurance carrier which extends malpractice insurance coverage to
25 Respondent. Respondent shall submit proof of compliance to the Board or its designee within 15
26 calendar days.

27 This condition shall apply to any change(s) in hospitals, other facilities or insurance carrier.

28 4. SUPERVISION OF PHYSICIAN ASSISTANTS. During probation, Respondent is

1 prohibited from supervising physician assistants.

2 5. OBEY ALL LAWS. Respondent shall obey all federal, state and local laws, all rules
3 governing the practice of medicine in California and remain in full compliance with any court
4 ordered criminal probation, payments, and other orders.

5 6. QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations
6 under penalty of perjury on forms provided by the Board, stating whether there has been
7 compliance with all the conditions of probation.

8 Respondent shall submit quarterly declarations not later than 10 calendar days after the end
9 of the preceding quarter.

10 7. GENERAL PROBATION REQUIREMENTS.

11 Compliance with Probation Unit

12 Respondent shall comply with the Board's probation unit and all terms and conditions of
13 this Decision.

14 Address Changes

15 Respondent shall, at all times, keep the Board informed of Respondent's business and
16 residence addresses, email address (if available), and telephone number. Changes of such
17 addresses shall be immediately communicated in writing to the Board or its designee. Under no
18 circumstances shall a post office box serve as an address of record, except as allowed by Business
19 and Professions Code section 2021(b).

20 Place of Practice

21 Respondent shall not engage in the practice of medicine in Respondent's or patient's place
22 of residence, unless the patient resides in a skilled nursing facility or other similar licensed
23 facility.

24 License Renewal

25 Respondent shall maintain a current and renewed California physician's and surgeon's
26 license.

27 Travel or Residence Outside California

28 Respondent shall immediately inform the Board or its designee, in writing, of travel to any

1 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than thirty
2 (30) calendar days.

3 In the event Respondent should leave the State of California to reside or to practice
4 Respondent shall notify the Board or its designee in writing 30 calendar days prior to the dates of
5 departure and return.

6 8. INTERVIEW WITH THE BOARD OR ITS DESIGNEE. Respondent shall be
7 available in person upon request for interviews either at Respondent's place of business or at the
8 probation unit office, with or without prior notice throughout the term of probation.

9 9. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or
10 its designee in writing within 15 calendar days of any periods of non-practice lasting more than
11 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is
12 defined as any period of time Respondent is not practicing medicine in California as defined in
13 Business and Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month
14 in direct patient care, clinical activity or teaching, or other activity as approved by the Board. All
15 time spent in an intensive training program which has been approved by the Board or its designee
16 shall not be considered non-practice. Practicing medicine in another state of the United States or
17 Federal jurisdiction while on probation with the medical licensing authority of that state or
18 jurisdiction shall not be considered non-practice. A Board-ordered suspension of practice shall
19 not be considered as a period of non-practice.

20 In the event Respondent's period of non-practice while on probation exceeds 18 calendar
21 months, Respondent shall successfully complete a clinical training program that meets the criteria
22 of Condition 18 of the current version of the Board's "Manual of Model Disciplinary Orders and
23 Disciplinary Guidelines" prior to resuming the practice of medicine.

24 Respondent's period of non-practice while on probation shall not exceed two (2) years.

25 Periods of non-practice will not apply to the reduction of the probationary term.

26 Periods of non-practice will relieve Respondent of the responsibility to comply with the
27 probationary terms and conditions with the exception of this condition and the following terms
28 and conditions of probation: Obey All Laws; and General Probation Requirements.

1 10. COMPLETION OF PROBATION. Respondent shall comply with all financial
2 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
3 completion of probation. Upon successful completion of probation, Respondent's certificate shall
4 be fully restored.

5 11. VIOLATION OF PROBATION. Failure to fully comply with any term or condition
6 of probation is a violation of probation. If Respondent violates probation in any respect, the
7 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and
8 carry out the disciplinary order that was stayed. If an Accusation, or Petition to Revoke Probation,
9 or an Interim Suspension Order is filed against Respondent during probation, the Board shall have
10 continuing jurisdiction until the matter is final, and the period of probation shall be extended until
11 the matter is final.

12 12. LICENSE SURRENDER. Following the effective date of this Decision, if
13 Respondent ceases practicing due to retirement or health reasons or is otherwise unable to satisfy
14 the terms and conditions of probation, Respondent may request to surrender his or her license.
15 The Board reserves the right to evaluate Respondent's request and to exercise its discretion in
16 determining whether or not to grant the request, or to take any other action deemed appropriate
17 and reasonable under the circumstances. Upon formal acceptance of the surrender, Respondent
18 shall within 15 calendar days deliver Respondent's wallet and wall certificate to the Board or its
19 designee and Respondent shall no longer practice medicine. Respondent will no longer be subject
20 to the terms and conditions of probation. If Respondent re-applies for a medical license, the
21 application shall be treated as a petition for reinstatement of a revoked certificate.

22 13. PROBATION MONITORING COSTS. Respondent shall pay the costs associated
23 with probation monitoring each and every year of probation, as designated by the Board, which
24 may be adjusted on an annual basis. Such costs shall be payable to the Medical Board of
25 California and delivered to the Board or its designee no later than January 31 of each calendar
26 year.

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ACCEPTANCE

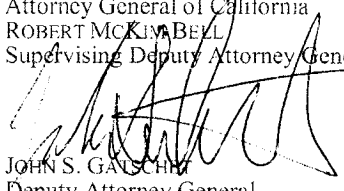
I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: March 12, 2015 
RAJINDER SINGH RANDHAWA, M.D.
Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order are hereby respectfully submitted for consideration by the Medical Board of California.

Dated: 3/12/15

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
ROBERT MCKIM BELL
Supervising Deputy Attorney General

JOHN S. GAUSCH
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 02-2013-232013

1 KAMALA D. HARRIS
Attorney General of California
2 ROBERT MCKIM BELL
Supervising Deputy Attorney General
3 JOHN S. GATSCHET
Deputy Attorney General
4 State Bar No. 244388
California Department of Justice
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Attorneys for Complainant

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO April 2, 2014
BY *[Signature]* ANALYST

9
10 BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
11 STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 02-2013-232013

13 **RAJINDER SINGH RANDHAWA, M.D.**

14 7720 Tennis Court
Antelope, California 95843

A C C U S A T I O N

15 Physician's and Surgeon's Certificate C 50081

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

- 20 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official
21 capacity as the Executive Director of the Medical Board of California ("Board").
- 22 2. On October 3, 1997, the Board issued Physician's and Surgeon's Certificate number C
23 50081 to Rajinder Singh Randhawa, M.D. ("Respondent"). That license expired on March 31,
24 2011. On April 1, 2011, Respondent's license went into delinquent status. On April 23, 2011,
25 the Respondent renewed his delinquent license. His license again expired on March 31, 2013.
26 On April 1, 2013, Respondent's license went into delinquent status. On May 11, 2013, the

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1 Respondent renewed his delinquent license. His license is currently in full force and effect and
2 will expire on March 31, 2015, unless renewed.

3 JURISDICTION

4 3. This Accusation is brought before the Board under the authority of the following
5 laws. All section references are to the Business and Professions Code (“Code”) unless otherwise
6 indicated.

7 4. Section 2227 of the Code provides that a licensee who is found guilty under the
8 Medical Practice Act may have his or her license revoked, suspended for a period not to exceed
9 one year, placed on probation and required to pay the costs of probation monitoring, or such other
10 action taken in relation to discipline as the Board deems proper.

11 5. Section 119 of the Code states:

12 “Any person who does any of the following is guilty of a misdemeanor:

13 “ ...

14 “(f) Photographs, photostats, duplicates, manufactures, or in any way reproduces any
15 license or facsimile thereof in a manner that it could be mistaken for a valid license, or displays or
16 has in his or her possession any such photograph, Photostat, duplicate, reproduction, or facsimile
17 unless authorized by this code.

18 “ ...

19 “As used in this section, “license” includes “certificate,” “permit,” “authority,” and
20 “registration” or any other indicia giving authorization to engage in a business or profession
21 regulated by this code or referred to in Section 1000 or 3600.”

22 6. Section 2234 of the Code, states:

23 “The board shall take action against any licensee who is charged with unprofessional
24 conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not
25 limited to, the following:

26 “(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the
27 violation of, or conspiring to violate any provision of this chapter.

28 “ ...

1 13. On April 30, 2013, the NSH medical staff coordinator requested additional
2 documentation directly from the Respondent. That same day, the Respondent faxed the NSH
3 medical staff coordinator a “pocket license” which had an expiration date of March 31, 2015.

4 14. On May 9, 2013, the NSF medical staff coordinator contacted the Medical Board to
5 verify that the Respondent’s license was valid. The NSF medical staff coordinator was informed
6 by the Medical Board that the Respondent’s license was delinquent.

7 15. On May 10, 2013, the NSF medical staff coordinator contacted the Medical Board
8 and spoke to a regulatory analyst. The regulatory analyst again verified that the account was
9 delinquent. The NSF medical staff coordinator informed the regulatory analyst that she had
10 received a “pocket license” from the Respondent that had an expiration date of March 31, 2015.
11 The regulatory analyst confirmed that the Medical Board had not issued Respondent a “pocket
12 license” with an expiration date of March 31, 2015. The regulatory analyst concluded the
13 expiration date had been altered.

14 16. After speaking to the Medical Board, the NSF medical staff coordinator informed her
15 supervisor that Respondent’s medical license was delinquent. The supervisor contacted the
16 Respondent and informed him that his license was delinquent and that he could not start
17 employment at NSH without a valid medical license.

18 17. On May 10, 2013, after being contacted by the supervisor, the Respondent renewed
19 his medical license by making payment on-line to the Medical Board. The Medical Board sent
20 the Respondent a valid “pocket license” with an expiration date of March 31, 2015.

21 18. On August 29, 2013, the Respondent admitted he received the valid “pocket license”
22 from the Medical Board by mail approximately a week after May 10, 2013.

23 19. The Respondent is subject to disciplinary action because he sent a fraudulent “pocket
24 license” to the Napa State Hospital in such a manner that it was mistakenly received as a valid
25 license.

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1 SECOND CAUSE FOR DISCIPLINE

2 (Signing a false document directly related to the practice of medicine)

3 20. Respondent is subject to disciplinary action under section 2261 in that he signed a
4 medical staff application which contained false information regarding his medical license. The
5 circumstances are as follows:

6 21. Complainant realleges paragraphs 9 through 18, those paragraphs are incorporated by
7 reference as if fully set forth herein.

8 22. On March 28, 2013, PHS sent Respondent an e-mail containing a blank copy of the
9 NSH medical staff application.

10 23. On April 30, 2013, the Respondent faxed the completed NSH medical staff
11 application to the NSH medical staff coordinator at NSH. On page three of Respondent's NSH
12 medical staff application, under the section titled MEDICAL/PSYCHOLOGY
13 LICENSURE/REGISTRATIONS, the Respondent's medical license number, C50081, was listed
14 as having an expiration date of March 31, 2015.

15 24. On page five of the NSH medical staff application, under section XVI, titled
16 ATTESTATION QUESTIONS, the following is listed under "A":

17 "Has your license to practice in any jurisdiction, your Drug Enforcement Administration
18 (DEA) registration or any applicable narcotic registration ever been denied, limited,
19 restricted, suspended, revoked, not renewed, or subject to probationary conditions, or have
20 you voluntarily or involuntarily relinquished any such license or registration or voluntarily
accepted any such actions or conditions, or have you been fined or received a letter of
reprimand or is such action pending?"

21 Next to question "A", the answer "NO," is marked with an "x."

22 25. On page six of the NSH medical staff application, the following is listed:

23 "I hereby affirm that the information in this Section XVI, Attestation Questions, and any
24 addenda thereto is true, current, correct, and complete to the best of my knowledge and
25 belief and is furnished in good faith. I understand that material, omissions or
26 misrepresentations may result in denial of my reapplication or termination of my
privileges, employment, or physician participation agreement."

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1 Respondent's name is printed in bold face print directly underneath the affirmation paragraph.
2 The Respondent's signature is directly underneath the Respondent's printed name. On the
3 signature line, directly next to Respondent's signature, is a typed date of April 24, 2013. On
4 January 8, 2014, the Respondent admitted that the signature located on page six is his signature
5 and admitted that he personally signed the document.

6 26. On page seven of the NSH medical staff application, the following is listed:

7 "I hereby affirm that the information submitted in this reapplication and addenda thereto
8 (including my curriculum vitae if attached) is true, current, correct, and complete to the
9 best of my knowledge and belief and is furnished in good faith. I understand that material
10 omissions or misrepresentations may result in denial of my reapplication or termination of
11 my privileges, employment of physician participation agreement. A photocopy of this
12 document shall be as effective as the original, however, current dates are required on pages
13 5 and 6.

12 Respondent's name is printed in bold face print directly underneath the affirmation paragraph.
13 The Respondent's signature is directly underneath the Respondent's printed name. On the
14 signature line, directly next to Respondent's signature, is a typed date of April 24, 2013. On
15 January 8, 2014, the Respondent admitted that the signature located on page seven is his signature
16 and admitted that he personally signed the document.

17 27. The Respondent is subject to disciplinary action because he signed a document
18 directly related to the practice of medicine that falsely represented that he possessed a valid
19 medical license.

20 **THIRD CAUSE FOR DISCIPLINE**

21 **(Dishonest and Corrupt Acts)**

22 28. Respondent is subject to disciplinary action under section 2234(e) in that he
23 committed dishonest and corrupt acts which are substantially related to the qualifications,
24 functions, or duties of a physician and surgeon. The circumstances are as follows:

25 29. Complainant realleges paragraphs 9 through 27, those paragraphs are incorporated by
26 reference as if fully set forth herein.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Medical Board of California issue a decision:

- 1. Revoking or suspending Physician's and Surgeon's Certificate Number C 50081, issued to Rajinder Singh Randhawa, M.D.;
- 2. Revoking, suspending or denying approval his authority to supervise physician's assistants, pursuant to section 3527 of the Code;
- 3. If placed on probation, ordering him to pay the Medical Board of California the costs of probation monitoring; and
- 4. Taking such other and further action as deemed necessary and proper.

DATED: April 2, 2014



KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California

Complainant

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