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

In the Matter of the Accusation ) Against: )	; se
Victor Boon Huat Siew, M.D.	Case No. 800-2014-002943
Physician's and Surgeon's ) Certificate No. G 32104	
Respondent )	

#### **DECISION**

The attached Stipulated Surrender of License 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 January 10, 2018.

IT IS SO ORDERED January 03, 2018.

MEDIGAL BOARD OF CALIFORNIA

Kimberly Kirchmeyer

**Executive Director** 

1	XAVIER BECERRA	
2	Attorney General of California MATTHEW M. DAVIS	
3 .	Supervising Deputy Attorney General TESSA L. HEUNIS	
, _	Deputy Attorney General	
4	State Bar No. 241559 600 West Broadway, Suite 1800	
5	San Diego, CA 92101 P.O. Box 85266	
-6	San Diego, CA 92186-5266	*
7	Telephone: (619) 738-9403 Facsimile: (619) 645-2061	
8	Attorneys for Complainant	
9		
10.	BEFORE THE	
11	MEDICAL BOARD OF CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS	-
	STATE OF CALIFORNIA	
12	In the Matter of the Accusation Against:  Case No. 2002014002042	
13	Case No. 8002014002945	
14	VICTOR BOON HUAT SIEW, M.D. 17220 New Hope Street, Ste. 125	
15	Fountain Valley, CA 92708 STIPULATED SURRENDER OF	
16	Physician's and Surgeon's Certificate No. G 32104  LICENSE AND DISCIPLINARY ORDER	R
17		
18	Respondent.	
19	IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above	<b>;-</b>
20	entitled proceedings that the following matters are true:	
21	<u>PARTIES</u>	
22	1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Boa	arc
23	of California (Board). She brought this action solely in her official capacity and is represented	1 i
24	this matter by Xavier Becerra, Attorney General of the State of California, by Tessa L. Heunis	,
. 25	Deputy Attorney General.	
26	2. Victor Boon Huat Siew, M.D. (Respondent) is represented in this proceeding by	
27	attorney Raymond J. McMahon, Esq., of Doyle Schafer McMahon, whose address is 5440	
28	Trabuco Road, Irvine, CA 92620.	

3. On or about July 1, 1976, the Board issued Physician's and Surgeon's Certificate No. G 32104 to Victor Boon Huat Siew, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges and allegations brought in Accusation No. 8002014002943 and will expire on October 31, 2018, unless renewed.

#### **JURISDICTION**

4. On November 30, 2017, Accusation No. 8002014002943 was filed before the Board, and is currently pending against respondent. On the same date, a true and correct copy of Accusation No. 8002014002943 and all other statutorily required documents were properly served on respondent. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 8002014002943 is attached hereto as Exhibit A and incorporated herein by this reference.

#### **ADVISEMENT AND WAIVERS**

- 5. Respondent has carefully read, fully discussed with counsel, and fully understands the charges and allegations in Accusation No. 8002014002943. Respondent also has carefully read, fully discussed with counsel, and fully understands the effects of this Stipulated Surrender of License and Disciplinary Order.
- 6. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.
- 7. Having the benefit of counsel, respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

#### **CULPABILITY**

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 8002014002943, agrees that cause exists for discipline and hereby surrenders his Physician's and Surgeon's Certificate No. G 32104 for the Board's formal acceptance.

9. Respondent understands that by signing this stipulation he enables the Board to issue an order accepting the surrender of his Physician's and Surgeon's Certificate No. G 32104 without further process.

#### **CONTINGENCY**

- 10. Business and Professions Code section 2224, subdivision (b), provides, in pertinent part, that the Board "shall delegate to its executive director the authority to adopt a ... stipulation for surrender of a license."
- 11. Respondent understands that, by signing this stipulation, he enables the Executive Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his Physician's and Surgeon's Certificate No. G 32104 without further notice to, or opportunity to be heard by, respondent.
- 12. This Stipulated Surrender of License and Disciplinary Order shall be subject to the approval of the Executive Director on behalf of the Board. The parties agree that this Stipulated Surrender of License and Disciplinary Order shall be submitted to the Executive Director for her consideration in the above-entitled matter and, further, that the Executive Director shall have a reasonable period of time in which to consider and act on this Stipulated Surrender of License and Disciplinary Order after receiving it. By signing this stipulation, respondent fully understands and agrees that he may not withdraw his agreement or seek to rescind this stipulation prior to the time the Executive Director, on behalf of the Medical Board, considers and acts upon it.
- 13. The parties agree that this Stipulated Surrender of License and Disciplinary Order shall be null and void and not binding upon the parties unless approved and adopted by the Executive Director on behalf of the Board, except for this paragraph, which shall remain in full force and effect. Respondent fully understands and agrees that in deciding whether or not to approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Executive Director and/or the Board may receive oral and written communications from its staff and/or the Attorney General's Office. Communications pursuant to this paragraph shall not disqualify the Executive Director, the Board, any member thereof, and/or any other person from future participation in this or any other matter affecting or involving respondent. In the event that the

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Executive Director on behalf of the Board does not, in her discretion, approve and adopt this Stipulated Surrender of License and Disciplinary Order, with the exception of this paragraph, it shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied upon or introduced in any disciplinary action by either party hereto. Respondent further agrees that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason by the Executive Director on behalf of the Board, respondent will assert no claim that the Executive Director, the Board, or any member thereof, was prejudiced by its/his/her review, discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or of any matter or matters related hereto.

#### **ADDITIONAL PROVISIONS**

- 14. This Stipulated Surrender of License and Disciplinary Order is intended by the parties herein to be an integrated writing representing the complete, final and exclusive embodiment of the agreements of the parties in the above-entitled matter.
- 15. The parties agree that copies of this Stipulated Surrender of License and Disciplinary Order, including copies of the signatures of the parties, may be used in lieu of original documents and signatures and, further, that such copies shall have the same force and effect as originals.
- 16. In consideration of the foregoing admissions and stipulations, the parties agree the Executive Director of the Board may, without further notice to or opportunity to be heard by respondent, issue and enter the following Disciplinary Order on behalf of the Board:

#### <u>ORDER</u>

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G 32104, issued to Respondent Victor Boon Huat Siew, M.D., is surrendered and accepted by the Medical Board of California.

1. The surrender of Respondent's Physician's and Surgeon's Certificate and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against respondent. This stipulation constitutes a record of the discipline and shall become a part of respondent's license history with the Medical Board of California.

- 2. Respondent shall lose all rights and privileges as a Physician and Surgeon in California as of the effective date of the Board's Decision and Order.
- 3. Respondent shall cause to be delivered to the Board his pocket license and, if one was issued, his wall certificate on or before the effective date of the Decision and Order.
- 4. If respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 8002014002943 shall be deemed to be true, correct and admitted by respondent when the Board determines whether to grant or deny the petition.
- 5. If respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 8002014002943 shall be deemed to be true, correct, and admitted by respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

# ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Disciplinary Order and have fully discussed it with my attorney, Raymond McMahon, Esq. I fully understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate G 32104. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED:	12.5-17	The mi
		VICTOR BOON HUAT SIEW, M.D.
		Respondent

I have read and fully discussed with Respondent Victor Boon Huat Siew, M.D., the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

RAYMOND MCMAHON, ESQ. Attorney for Respondent

- Respondent shall lose all rights and privileges as a Physician and Surgeon in
   California as of the effective date of the Board's Decision and Order.
- 3. Respondent shall cause to be delivered to the Board his pocket license and, if one was issued, his wall certificate on or before the effective date of the Decision and Order.
- 4. If respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 8002014002943 shall be deemed to be true, correct and admitted by respondent when the Board determines whether to grant or deny the petition.
- 5. If respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 8002014002943 shall be deemed to be true, correct, and admitted by respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

#### **ACCEPTANCE**

I have carefully read the above Stipulated Surrender of License and Disciplinary Order and have fully discussed it with my attorney, Raymond McMahon, Esq. I fully understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate G 32104. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED:	12.5-17			u.
			VICTOR BOON HUAT SIEW, M.D.	),
		•	Respondent	

I have read and fully discussed with Respondent Victor Boon Huat Siew, M.D., the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: 12/7/17

RAYMOND MCMAHON, ESO

Attorney for Respondent

# **ENDORSEMENT** The foregoing Stipulated Surrender of License and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California of the Department of Consumer Affairs. Dated: December 22, 2017 Respectfully submitted, XAVIER BECERRA Attorney General of California MATTHEW M. DAVIS Supervising Deputy Attorney General Deputy Attorney General Attorneys for Complainant

# Exhibit A

Accusation No. 8002014002943

		-	
1	2 MITTER BEELIGI		
2	Attorney General of California FILED  MATTHEW M. DAVIS STATE OF CALIFORNIA		
3	Supervising Deputy Attorney General  MEDICAL BOARD OF CALIFORM		
	Deputy Attorney General SACRAMENTO NOV. 70, 20	N VOT	
4	State Bar No. 241559 600 West Broadway, Suite 1800	ALTOI	
5			
6	6 San Diego, CA 92186-5266		
7	Telephone: (619) 738-9403 Facsimile: (619) 645-2061		
. 8	8 Attorneys for Complainant		
9	9		
10			
11		MEDICAL BOARD OF CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS	
12	STATE OF CALIFORNIA		
13		•	
14			
15	17220 New Hope Street, Ste. 125		
16	Physician's and Surgeon's Certificate	• .	
17	No. G 32104,	*	
18	Respondent.		
19	Complainant alleges:		
20	20 PARTIES		
21	1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official		
22	capacity as the Executive Director of the Medical Board of California, Department of Consumer		
23	23 Affairs (Board).		
24	2. On or about July 1, 1976, the Board issued Physician's and Surgeon's Certificate		
25	Number G 32104 to Victor Boon Huat Siew, M.D. (Respondent). The Physician's and Surgeon's		
. 26	Certificate was in full force and effect at all times relevant to the charges and allegations brought		
27	27 herein and will expire on October 31, 2018, unless renewed.	herein and will expire on October 31, 2018, unless renewed.	
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#### **PRIOR DISCIPLINE**

3. In a prior disciplinary action entitled *In the Matter of the Accusation Against Victor Siew, M.D.*, Case No. 04-94-36072, the Board issued a decision and order, effective February 18, 1998, in which respondent was publicly reproved by the Board for aiding and abetting the unlicensed practice of medicine in violation of Business and Professions Code section 2264, and committing acts involving dishonesty or corruption which were substantially related to the qualifications, functions, or duties of a physician and surgeon, in violation of Business and Professions Code section 2234, subdivision (e).

#### **JURISDICTION**

- 4. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.
  - 5. Section 2227 of the Code states:
  - "(a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter:
    - "(1) Have his or her license revoked upon order of the board.
    - "(2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.
    - "(3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.
    - "(4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.
    - "(5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.

"(b) Any matter heard pursuant to subdivision (a), except for ma	tters made	
confidential or privileged by existing law, is deemed public, and shall be	made avail	able to
the public by the board pursuant to Section 803.1."		

#### 6. Section 2234 of the Code, states:

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

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

"

"(f) Any action or conduct which would have warranted the denial of a certificate.
""

#### 7. Section 2236 of the Code states:

"(a) The conviction of any offense substantially related to the qualifications, functions, or duties of a physician and surgeon constitutes unprofessional conduct within the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record of conviction shall be conclusive evidence only of the fact that the conviction occurred.

"

- "(c) The clerk of the court in which a licensee is convicted of a crime shall, within 48 hours after the conviction, transmit a certified copy of the record of conviction to the board. The division may inquire into the circumstances surrounding the commission of a crime in order to fix the degree of discipline or to determine if the conviction is of an offense substantially related to the qualifications, functions, or duties of a physician and surgeon.
- "(d) A plea or verdict of guilty or a conviction after a plea of *nolo contendere* is deemed to be a conviction within the meaning of this section and Section 2236.1. The record of conviction shall be conclusive evidence of the fact that the conviction occurred."

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#### 8. Section 2237 of the Code states:

- "(a) The conviction of a charge of violating any federal statutes or regulations or any statute or regulation of this state, regulating dangerous drugs or controlled substances, constitutes unprofessional conduct. The record of the conviction is conclusive evidence of such unprofessional conduct. A plea or verdict of guilty or a conviction following a plea of *nolo contendere* is deemed to be a conviction within the meaning of this section.
- "(b) Discipline may be ordered in accordance with Section 2227 or the Medical Board may order the denial of the license when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code allowing such person to withdraw his or her plea of guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or dismissing the accusation, complaint, information, or indictment."

#### 9. Section 2238 of the Code states:

"A violation of any federal statute or federal regulation or any of the statutes or regulations of this state regulating dangerous drugs or controlled substances constitutes unprofessional conduct."

#### 10. Section 2242 of the Code states:

"(a) Prescribing, dispensing, or furnishing dangerous drugs as defined in Section 4022 without an appropriate prior examination and a medical indication, constitutes unprofessional conduct.

#### 11. Section 2221 of the Code states:

"(a) The board may deny a physician's and surgeon's certificate ... to an applicant guilty of unprofessional conduct or of any cause that would subject a licensee to revocation or suspension of his or her license...

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#### 12. Section 4021 of the Code states:

"Controlled substance" means any substance listed in Chapter 2 (commencing with Section 11053) of Division 10 of the Health and Safety Code."

#### 13. Section 4022 of the Code states:

"Dangerous drug' or 'dangerous device' means any drug or device unsafe for selfuse in humans or animals, and includes the following:

"(a) Any drug that bears the legend: 'Caution: federal law prohibits dispensing without prescription,' 'Rx only,' or words of similar import.

"

"(c) Any other drug ... that by federal or state law can be lawfully dispensed only on prescription or furnished pursuant to Section 4006."

#### 14. Health and Safety Code section 11153 states:

- "(a) A prescription for a controlled substance shall only be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his or her professional practice. The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, but a corresponding responsibility rests with the pharmacist who fills the prescription. Except as authorized by this division, the following are not legal prescriptions: (1) an order purporting to be a prescription which is issued not in the usual course of professional treatment or in legitimate and authorized research; or (2) an order for an addict or habitual user of controlled substances, which is issued not in the course of professional treatment or as part of an authorized narcotic treatment program, for the purpose of providing the user with controlled substances, sufficient to keep him or her comfortable by maintaining customary use.
- "(b) Any person who knowingly violates this section shall be punished by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code, or in a county jail not exceeding one year, or by a fine not exceeding twenty thousand dollars (\$20,000), or by both that fine and imprisonment.

15. United States Code, Title 21, section 841 states:

"(a) Unlawful acts

"Except as authorized by this subchapter, it shall be unlawful for any person knowingly or intentionally--

"(1) to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance;

• • • • • • •

16. Section 118 of the Code states:

- "(b) The suspension, expiration, or forfeiture by operation of law of a license issued by a board in the department, or its suspension, forfeiture, or cancellation by order of the board or by order of a court of law, or its surrender without the written consent of the board, shall not, during any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or continue a disciplinary proceeding against the licensee upon any ground provided by law or to enter an order suspending or revoking the license or otherwise taking disciplinary action against the licensee on any such ground.
- "(c) As used in this section, 'board' includes an individual who is authorized by any provision of this code to issue, suspend, or revoke a license, and 'license' includes 'certificate,' 'registration,' and 'permit.""

#### FIRST CAUSE FOR DISCIPLINE

#### (Conviction Of A Crime)

- 17. Respondent is subject to disciplinary action under sections 2227 and 2234, as defined by section 2236, of the Code, in that he has been convicted of an offense substantially related to the qualifications, functions, or duties of a physician and surgeon, as more particularly alleged hereinafter:
- 18. On or about June 8, 2016, in the case entitled *United States of America v. Victor Boon Huat Siew, Kaitlyn Phuong Nguyen, and Thanh Nha T. Pham*, United States District Court,

Central District of California, Southern Division, Case No. SACR16-00079, an indictment was filed against respondent and two other defendants. The indictment charged the three defendants with one count of conspiracy to distribute controlled substances (21 U.S.C. § 846), thirty-two counts of distribution of a controlled substance in Schedule II (21 U.S.C. § 841, subds. (a)(1), (b)(1)(C)), and twenty-two counts of distribution of a controlled substance in Schedule IV (21 U.S.C. § 841, subds. (a)(1), (b)(2)). The indictment alleged, further, that the defendants aided and abetted one another (18 U.S.C. § 2, subd. (a)) and willfully caused the aforementioned acts to be done (18 U.S.C. § 2, subd. (b)).

- 19. On or about May 15, 2017, respondent entered into a plea agreement with the United States Attorney's Office for the Central District of California, wherein he agreed to the following statement of facts:
- (a) From approximately January 2009 and continuing until approximately February 2015, in Fountain Valley, California, respondent, a medical doctor licensed to practice medicine in California, knowingly and intentionally distributed controlled substances outside the usual course of professional practice and without a legitimate medical purpose. Specifically, on February 14, 2012, respondent, while acting and intending to act outside the usual course of professional practice and without a legitimate medical purpose, knowingly and intentionally gave M.S. a prescription for 180 oxycodone pills, 240 methadone pills, and 90 alprazolam pills.
- (b) Between January 2009 and February 2015, respondent intentionally prescribed and caused to be prescribed the following controlled substances outside the usual course of professional practice and without a legitimate medical purpose to the individuals identified in the indictment: 2,190 oxycodone tablets, with a marijuana equivalent of 528.63 kilograms; 1,860 methadone tablets, with a marijuana equivalent of 9.3 kilograms; and 1,540 alprazolam tablets, with a marijuana equivalent of 0.096 kilograms.
- 20. On or about June 1, 2017, respondent pled guilty to one count of distribution of a controlled substance in Schedule II, namely, oxycodone (Count 3), and one count of distribution of a controlled substance in Schedule IV, namely, alprazolam (Count 36).

21. On or about September 11, 2017, respondent was sentenced to imprisonment for seventy (70) months on Count 3 of the indictment, and sixty (60) months on Count 36 of the indictment, to be served concurrently. Respondent was also ordered to pay to the United States a fine of \$1,000,000 on Count 3. Upon release from imprisonment, respondent will be placed on supervised release for three years on each of Counts 3 and 36 of the indictment, to run concurrently. During this period, respondent will not be permitted to be employed in any position that requires licensing and/or certification by any local, state, or federal agency without the prior written approval of the Probation Officer.

#### SECOND CAUSE FOR DISCIPLINE

# (Conviction Of Violating A Federal Statute or Regulation, Regulating Controlled Substances)

22. Respondent is further subject to disciplinary action under sections 2227 and 2234, as defined by section 2237, of the Code, in that he was convicted of a charge of violating a federal statute or regulation or any statute or regulation of this state, regulating dangerous drugs or controlled substances, as more particularly alleged in paragraphs 17 through 21, above, and which are hereby realleged and incorporated by reference as if fully set forth herein.

#### THIRD CAUSE FOR DISCIPLINE

# (Violation Of A Federal or State Statute or Regulation, Regulating Dangerous Drugs Or Controlled Substances)

23. Respondent is further subject to disciplinary action under sections 2227 and 2234, as defined by section 2238, of the Code, in that he violated a federal statute or federal regulation or any of the statutes or regulations of this state regulating dangerous drugs or controlled substances, as more particularly alleged in paragraphs 17 through 22, above, and which are hereby realleged and incorporated by reference as if fully set forth herein.

### FOURTH CAUSE FOR DISCIPLINE

## (Furnishing Dangerous Drugs Without Medical Indication)

24. Respondent is further subject to disciplinary action under sections 2227 and 2234, as defined by section 2242, of the Code, in that he prescribed, dispensed, or furnished dangerous

ı l	drugs as defined in Section 4022 without an appropriate prior examination and a medical
2	indication, as more particularly alleged in paragraphs 17 through 23, above, and which are hereby
3	realleged and incorporated by reference as if fully set forth herein.
4.	FIFTH CAUSE FOR DISCIPLINE
5	(General unprofessional conduct)
6	25. Respondent is further subject to disciplinary action under sections 2227 and 2234 of
7	the Code, in that he has engaged in conduct which breaches the rules or ethical code of the
8	medical profession, or conduct that is unbecoming to a member in good standing of the medical
9	profession, and which demonstrates an unfitness to practice medicine, as more particularly
10	alleged in paragraphs 17 through 24, above, and which are hereby realleged and incorporated by
11	reference as if fully set forth herein.
12	<u>PRAYER</u>
13	WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
14	and that following the hearing, the Medical Board of California issue a decision:
15	1. Revoking or suspending Physician's and Surgeon's Certificate Number G 32104,
16	issued to Respondent Victor Boon Huat Siew, M.D.;
17	2. Revoking, suspending or denying approval of Respondent Victor Boon Huat Siew,
18	M.D.'s authority to supervise physician assistants and advanced practice nurses;
19	3. Ordering Respondent Victor Boon Huat Siew, M.D., if placed on probation, to pay
20	the Board the costs of probation monitoring; and
21.	4. Taking such other and further action as deemed necessary and proper.
22	12.1 / 1). 1
23	DATED: November 30, 2017 MWW SWMW
24	KIMBERLY KIRCHMEYER Executive Director
25	Medical Board of California Department of Consumer Affairs
26	State of California  Complainant
27	
28	