

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

In the Matter of the Accusation)
Against:)
)
)
Victor Boon Huat Siew, M.D.)
)
Physician's and Surgeon's)
Certificate No. G 32104)
)
Respondent)
_____)

Case No. 800-2014-002943

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.

MEDICAL BOARD OF CALIFORNIA

By: 

**Kimberly Kirchmeyer
Executive Director**

1 XAVIER BECERRA
Attorney General of California
2 MATTHEW M. DAVIS
Supervising Deputy Attorney General
3 TESSA L. HEUNIS
Deputy Attorney General
4 State Bar No. 241559
600 West Broadway, Suite 1800
5 San Diego, CA 92101
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8 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:

Case No. 8002014002943

14 **VICTOR BOON HUAT SIEW, M.D.**
17220 New Hope Street, Ste. 125
15 Fountain Valley, CA 92708

16 **Physician's and Surgeon's Certificate**
No. G 32104

STIPULATED SURRENDER OF
LICENSE AND DISCIPLINARY ORDER

17 Respondent.

18
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
20 entitled proceedings that the following matters are true:

21 **PARTIES**

22 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board
23 of California (Board). She brought this action solely in her official capacity and is represented in
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.

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

5 **JURISDICTION**

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

12 **ADVISEMENT AND WAIVERS**

13 5. Respondent has carefully read, fully discussed with counsel, and fully understands the
14 charges and allegations in Accusation No. 8002014002943. Respondent also has carefully read,
15 fully discussed with counsel, and fully understands the effects of this Stipulated Surrender of
16 License and Disciplinary Order.

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

23 7. Having the benefit of counsel, respondent voluntarily, knowingly, and intelligently
24 waives and gives up each and every right set forth above.

25 **CULPABILITY**

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

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

4 **CONTINGENCY**

5 10. Business and Professions Code section 2224, subdivision (b), provides, in pertinent
6 part, that the Board “shall delegate to its executive director the authority to adopt a ... stipulation
7 for surrender of a license.”

8 11. Respondent understands that, by signing this stipulation, he enables the Executive
9 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his
10 Physician’s and Surgeon’s Certificate No. G 32104 without further notice to, or opportunity to be
11 heard by, respondent.

12 12. This Stipulated Surrender of License and Disciplinary Order shall be subject to the
13 approval of the Executive Director on behalf of the Board. The parties agree that this Stipulated
14 Surrender of License and Disciplinary Order shall be submitted to the Executive Director for her
15 consideration in the above-entitled matter and, further, that the Executive Director shall have a
16 reasonable period of time in which to consider and act on this Stipulated Surrender of License and
17 Disciplinary Order after receiving it. By signing this stipulation, respondent fully understands
18 and agrees that he may not withdraw his agreement or seek to rescind this stipulation prior to the
19 time the Executive Director, on behalf of the Medical Board, considers and acts upon it.

20 13. The parties agree that this Stipulated Surrender of License and Disciplinary Order
21 shall be null and void and not binding upon the parties unless approved and adopted by the
22 Executive Director on behalf of the Board, except for this paragraph, which shall remain in full
23 force and effect. Respondent fully understands and agrees that in deciding whether or not to
24 approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Executive
25 Director and/or the Board may receive oral and written communications from its staff and/or the
26 Attorney General’s Office. Communications pursuant to this paragraph shall not disqualify the
27 Executive Director, the Board, any member thereof, and/or any other person from future
28 participation in this or any other matter affecting or involving respondent. In the event that the

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

10 **ADDITIONAL PROVISIONS**

11 14. This Stipulated Surrender of License and Disciplinary Order is intended by the parties
12 herein to be an integrated writing representing the complete, final and exclusive embodiment of
13 the agreements of the parties in the above-entitled matter.

14 15. The parties agree that copies of this Stipulated Surrender of License and Disciplinary
15 Order, including copies of the signatures of the parties, may be used in lieu of original documents
16 and signatures and, further, that such copies shall have the same force and effect as originals.

17 16. In consideration of the foregoing admissions and stipulations, the parties agree the
18 Executive Director of the Board may, without further notice to or opportunity to be heard by
19 respondent, issue and enter the following Disciplinary Order on behalf of the Board:

20 **ORDER**

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

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

28 ////

1 2. Respondent shall lose all rights and privileges as a Physician and Surgeon in
2 California as of the effective date of the Board's Decision and Order.

3 3. Respondent shall cause to be delivered to the Board his pocket license and, if one was
4 issued, his wall certificate on or before the effective date of the Decision and Order.

5 4. If respondent ever files an application for licensure or a petition for reinstatement in
6 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
7 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
8 effect at the time the petition is filed, and all of the charges and allegations contained in
9 Accusation No. 8002014002943 shall be deemed to be true, correct and admitted by respondent
10 when the Board determines whether to grant or deny the petition.

11 5. If respondent should ever apply or reapply for a new license or certification, or
12 petition for reinstatement of a license, by any other health care licensing agency in the State of
13 California, all of the charges and allegations contained in Accusation No. 8002014002943 shall
14 be deemed to be true, correct, and admitted by respondent for the purpose of any Statement of
15 Issues or any other proceeding seeking to deny or restrict licensure.

16 **ACCEPTANCE**

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

22 DATED: 12-5-17


VICTOR BOON HUAT SIEW, M.D.
Respondent

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

27 DATED: _____

RAYMOND MCMAHON, ESQ.
Attorney for Respondent

1 2. Respondent shall lose all rights and privileges as a Physician and Surgeon in
2 California as of the effective date of the Board's Decision and Order.

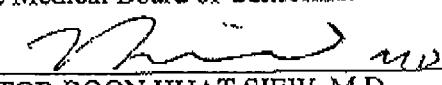
3 3. Respondent shall cause to be delivered to the Board his pocket license and, if one was
4 issued, his wall certificate on or before the effective date of the Decision and Order.

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6 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
7 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
8 effect at the time the petition is filed, and all of the charges and allegations contained in
9 Accusation No. 8002014002943 shall be deemed to be true, correct and admitted by respondent
10 when the Board determines whether to grant or deny the petition.

11 5. If respondent should ever apply or reapply for a new license or certification, or
12 petition for reinstatement of a license, by any other health care licensing agency in the State of
13 California, all of the charges and allegations contained in Accusation No. 8002014002943 shall
14 be deemed to be true, correct, and admitted by respondent for the purpose of any Statement of
15 Issues or any other proceeding seeking to deny or restrict licensure.

16 ACCEPTANCE

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

22 DATED: 12-5-17 _____ 
23 VICTOR BOON HUAT SIEW, M.D.
Respondent

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

27 DATED: 12/7/17 _____ 
28 RAYMOND MCMAHON, ESQ.
Attorney for Respondent

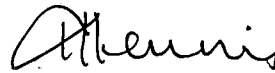
ENDORSEMENT

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



TESSA L. HEUNIS
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 8002014002943

1 XAVIER BECERRA
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2 MATTHEW M. DAVIS
Supervising Deputy Attorney General
3 TESSA L. HEUNIS
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8 *Attorneys for Complainant*

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO NOV. 30, 2017
BY Alva Pearson ANALYST

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

13 In the Matter of the Accusation Against:

Case No. 8002014002943

14 **Victor Boon Huat Siew, M.D.**
15 **17220 New Hope Street, Ste. 125**
Fountain Valley, CA 92708

ACCUSATION

16 **Physician's and Surgeon's Certificate**
17 **No. G 32104,**

18 Respondent.

19 Complainant alleges:

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 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 herein and will expire on October 31, 2018, unless renewed.

28 ////

1 **PRIOR DISCIPLINE**

2 3. In a prior disciplinary action entitled *In the Matter of the Accusation Against Victor*
3 *Siew, M.D.*, Case No. 04-94-36072, the Board issued a decision and order, effective February 18,
4 1998, in which respondent was publicly reprovved by the Board for aiding and abetting the
5 unlicensed practice of medicine in violation of Business and Professions Code section 2264, and
6 committing acts involving dishonesty or corruption which were substantially related to the
7 qualifications, functions, or duties of a physician and surgeon, in violation of Business and
8 Professions Code section 2234, subdivision (e).

9 **JURISDICTION**

10 4. This Accusation is brought before the Board, under the authority of the following
11 laws. All section references are to the Business and Professions Code (Code) unless otherwise
12 indicated.

13 5. Section 2227 of the Code states:

14 “(a) A licensee whose matter has been heard by an administrative law judge of the
15 Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or
16 whose default has been entered, and who is found guilty, or who has entered into a
17 stipulation for disciplinary action with the board, may, in accordance with the provisions of
18 this chapter:

19 “(1) Have his or her license revoked upon order of the board.

20 “(2) Have his or her right to practice suspended for a period not to exceed one year
21 upon order of the board.

22 “(3) Be placed on probation and be required to pay the costs of probation monitoring
23 upon order of the board.

24 “(4) Be publicly reprimanded by the board. The public reprimand may include a
25 requirement that the licensee complete relevant educational courses approved by the
26 board.

27 “(5) Have any other action taken in relation to discipline as part of an order of
28 probation, as the board or an administrative law judge may deem proper.

1 “(b) Any matter heard pursuant to subdivision (a), except for ... matters made
2 confidential or privileged by existing law, is deemed public, and shall be made available to
3 the public by the board pursuant to Section 803.1.”

4 6. Section 2234 of the Code, states:

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

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

10 “...

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

12 “...”

13 7. Section 2236 of the Code states:

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

18 “...

19 “(c) The clerk of the court in which a licensee is convicted of a crime shall, within 48
20 hours after the conviction, transmit a certified copy of the record of conviction to the board.
21 The division may inquire into the circumstances surrounding the commission of a crime in
22 order to fix the degree of discipline or to determine if the conviction is of an offense
23 substantially related to the qualifications, functions, or duties of a physician and surgeon.

24 “(d) A plea or verdict of guilty or a conviction after a plea of *nolo contendere* is
25 deemed to be a conviction within the meaning of this section and Section 2236.1. The
26 record of conviction shall be conclusive evidence of the fact that the conviction occurred.”

27 ////

28 ////

1 8. Section 2237 of the Code states:

2 “(a) The conviction of a charge of violating any federal statutes or regulations or any
3 statute or regulation of this state, regulating dangerous drugs or controlled substances,
4 constitutes unprofessional conduct. The record of the conviction is conclusive evidence of
5 such unprofessional conduct. A plea or verdict of guilty or a conviction following a plea of
6 *nolo contendere* is deemed to be a conviction within the meaning of this section.

7 “(b) Discipline may be ordered in accordance with Section 2227 or the Medical
8 Board may order the denial of the license when the time for appeal has elapsed, or the
9 judgment of conviction has been affirmed on appeal, or when an order granting probation is
10 made suspending the imposition of sentence, irrespective of a subsequent order under the
11 provisions of Section 1203.4 of the Penal Code allowing such person to withdraw his or her
12 plea of guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or
13 dismissing the accusation, complaint, information, or indictment.”

14 9. Section 2238 of the Code states:

15 “A violation of any federal statute or federal regulation or any of the statutes or
16 regulations of this state regulating dangerous drugs or controlled substances constitutes
17 unprofessional conduct.”

18 10. Section 2242 of the Code states:

19 “(a) Prescribing, dispensing, or furnishing dangerous drugs as defined in Section
20 4022 without an appropriate prior examination and a medical indication, constitutes
21 unprofessional conduct.

22 “...”

23 11. Section 2221 of the Code states:

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

27 “...”

28 ////

1 12. Section 4021 of the Code states:

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

4 13. Section 4022 of the Code states:

5 "Dangerous drug" or "dangerous device" means any drug or device unsafe for self-
6 use in humans or animals, and includes the following:

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

9 "...

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

12 14. Health and Safety Code section 11153 states:

13 "(a) A prescription for a controlled substance shall only be issued for a legitimate
14 medical purpose by an individual practitioner acting in the usual course of his or her
15 professional practice. The responsibility for the proper prescribing and dispensing of
16 controlled substances is upon the prescribing practitioner, but a corresponding
17 responsibility rests with the pharmacist who fills the prescription. Except as authorized by
18 this division, the following are not legal prescriptions: (1) an order purporting to be a
19 prescription which is issued not in the usual course of professional treatment or in
20 legitimate and authorized research; or (2) an order for an addict or habitual user of
21 controlled substances, which is issued not in the course of professional treatment or as part
22 of an authorized narcotic treatment program, for the purpose of providing the user with
23 controlled substances, sufficient to keep him or her comfortable by maintaining customary
24 use.

25 "(b) Any person who knowingly violates this section shall be punished by
26 imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code, or in a
27 county jail not exceeding one year, or by a fine not exceeding twenty thousand dollars
28 (\$20,000), or by both that fine and imprisonment.

1 "..."

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

3 "(a) Unlawful acts

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

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

8 "..."

9 16. Section 118 of the Code states:

10 "...

11 "(b) The suspension, expiration, or forfeiture by operation of law of a license issued
12 by a board in the department, or its suspension, forfeiture, or cancellation by order of the
13 board or by order of a court of law, or its surrender without the written consent of the board,
14 shall not, during any period in which it may be renewed, restored, reissued, or reinstated,
15 deprive the board of its authority to institute or continue a disciplinary proceeding against
16 the licensee upon any ground provided by law or to enter an order suspending or revoking
17 the license or otherwise taking disciplinary action against the licensee on any such ground.

18 "(c) As used in this section, 'board' includes an individual who is authorized by any
19 provision of this code to issue, suspend, or revoke a license, and 'license' includes
20 'certificate,' 'registration,' and 'permit.'"

21 **FIRST CAUSE FOR DISCIPLINE**

22 **(Conviction Of A Crime)**

23 17. Respondent is subject to disciplinary action under sections 2227 and 2234, as defined
24 by section 2236, of the Code, in that he has been convicted of an offense substantially related to
25 the qualifications, functions, or duties of a physician and surgeon, as more particularly alleged
26 hereinafter:

27 18. On or about June 8, 2016, in the case entitled *United States of America v. Victor Boon*
28 *Huat Siew, Kaitlyn Phuong Nguyen, and Thanh Nha T. Pham*, United States District Court,

1 Central District of California, Southern Division, Case No. SACR16-00079, an indictment was
2 filed against respondent and two other defendants. The indictment charged the three defendants
3 with one count of conspiracy to distribute controlled substances (21 U.S.C. § 846), thirty-two
4 counts of distribution of a controlled substance in Schedule II (21 U.S.C. § 841, subds. (a)(1),
5 (b)(1)(C)), and twenty-two counts of distribution of a controlled substance in Schedule IV
6 (21 U.S.C. § 841, subds. (a)(1), (b)(2)). The indictment alleged, further, that the defendants aided
7 and abetted one another (18 U.S.C. § 2, subd. (a)) and willfully caused the aforementioned acts to
8 be done (18 U.S.C. § 2, subd. (b)).

9 19. On or about May 15, 2017, respondent entered into a plea agreement with the United
10 States Attorney's Office for the Central District of California, wherein he agreed to the following
11 statement of facts:

12 (a) From approximately January 2009 and continuing until approximately February 2015,
13 in Fountain Valley, California, respondent, a medical doctor licensed to practice medicine in
14 California, knowingly and intentionally distributed controlled substances outside the usual course
15 of professional practice and without a legitimate medical purpose. Specifically, on February 14,
16 2012, respondent, while acting and intending to act outside the usual course of professional
17 practice and without a legitimate medical purpose, knowingly and intentionally gave M.S. a
18 prescription for 180 oxycodone pills, 240 methadone pills, and 90 alprazolam pills.

19 (b) Between January 2009 and February 2015, respondent intentionally prescribed and
20 caused to be prescribed the following controlled substances outside the usual course of
21 professional practice and without a legitimate medical purpose to the individuals identified in the
22 indictment: 2,190 oxycodone tablets, with a marijuana equivalent of 528.63 kilograms; 1,860
23 methadone tablets, with a marijuana equivalent of 9.3 kilograms; and 1,540 alprazolam tablets,
24 with a marijuana equivalent of 0.096 kilograms.

25 20. On or about June 1, 2017, respondent pled guilty to one count of distribution of a
26 controlled substance in Schedule II, namely, oxycodone (Count 3), and one count of distribution
27 of a controlled substance in Schedule IV, namely, alprazolam (Count 36).

28 ////

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

9 **SECOND CAUSE FOR DISCIPLINE**

10 **(Conviction Of Violating A Federal Statute or Regulation,**
11 **Regulating Controlled Substances)**

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

17 **THIRD CAUSE FOR DISCIPLINE**

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

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

25 **FOURTH CAUSE FOR DISCIPLINE**

26 **(Furnishing Dangerous Drugs Without Medical Indication)**

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

1 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 **PRAYER**

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
23 DATED: November 30, 2017


24 KIMBERLY KIRCHMEYER
25 Executive Director
26 Medical Board of California
27 Department of Consumer Affairs
28 State of California
Complainant