

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

**In the Matter of the First Amended
Accusation Against:**

Donald A. Ramberg, M.D.

**Physician's & Surgeon's
Certificate No. G 56939**

Case No. 800-2018-049179

Respondent.

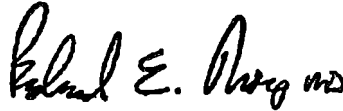
DECISION

**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 March 2, 2023.

IT IS SO ORDERED: January 31, 2023.

MEDICAL BOARD OF CALIFORNIA



**Richard E. Thorp, M.D., Chair
Panel B**

1 ROB BONTA
Attorney General of California
2 EDWARD KIM
Supervising Deputy Attorney General
3 CHRISTINA SEIN GOOT
Deputy Attorney General
4 State Bar No. 229094
California Department of Justice
5 300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
6 Telephone: (213) 269-6481
Facsimile: (916) 731-2117
7 *Attorneys for Complainant*

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

11 In the Matter of the First Amended Accusation
Against:

12 **DONALD A. RAMBERG, M.D.**
13 **699 California Blvd., Suite B**
San Luis Obispo, CA 93401

14 **Physician's and Surgeon's Certificate**
15 **No. G 56939,**

16 Respondent.

Case No. 800-2018-049179

OAH No. 2021050435

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. William Prasifka (Complainant) is the Executive Director of the Medical Board of
22 California (Board). He brought this action solely in his official capacity and is represented in this
23 matter by Rob Bonta, Attorney General of the State of California, by Christina Sein Goot, Deputy
24 Attorney General.

25 2. Respondent Donald A. Ramberg, M.D. (Respondent) is represented in this proceeding
26 by attorney Mark B. Connely, whose address is: 444 Higuera Street, Third Floor, San Luis
27 Obispo, CA 93401.

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3. On or about March 31, 1986, the Board issued Physician's and Surgeon's Certificate No. G 56939 to Respondent. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in First Amended Accusation No. 800-2018-049179, and will expire on July 31, 2023, unless renewed.

JURISDICTION

4. First Amended Accusation No. 800-2018-049179 was filed before the Board, and is currently pending against Respondent. The First Amended Accusation and all other statutorily required documents were properly served on Respondent on October 12, 2021. Respondent timely filed his Notice of Defense contesting the First Amended Accusation.

5. A copy of First Amended Accusation No. 800-2018-049179 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in First Amended Accusation No. 800-2018-049179. Respondent has also carefully read, fully discussed with his counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the First Amended 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.

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

CULPABILITY

9. Respondent understand and agrees that the charges and allegations in First Amended Accusation No. 800-2018-049179, if proven at a hearing, constitute cause for imposing discipline

1 upon his Physician's and Surgeon's Certificate. Respondent hereby gives up his right to contest
2 those charges and allegations.

3 10. Respondent does not contest that, at an administrative hearing, Complainant could
4 establish a *prima facie* case with respect to the charges and allegations contained in First
5 Amended Accusation No. 800-2018-049179 and that he has thereby subjected his license to
6 disciplinary action.

7 11. Respondent agrees that his Physician's and Surgeon's Certificate is subject to
8 discipline and he agrees to be bound by the Board's imposition of discipline as set forth in the
9 Disciplinary Order below.

10 CONTINGENCY

11 12. This stipulation shall be subject to approval by the Medical Board of California.
12 Respondent understands and agrees that counsel for Complainant and the staff of the Medical
13 Board of California may communicate directly with the Board regarding this stipulation and
14 settlement, without notice to or participation by Respondent or his counsel. By signing the
15 stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek
16 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
17 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
18 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
19 action between the parties, and the Board shall not be disqualified from further action by having
20 considered this matter.

21 13. Respondent agrees that if he ever petitions for modification of the terms of this
22 stipulation, or if a subsequent accusation is filed against him before the Board, all of the charges
23 and allegations contained in First Amended Accusation No. 800-2018-049179 shall be deemed
24 true, correct and fully admitted by Respondent for purposes of any such proceeding or any other
25 licensing proceeding involving Respondent in the State of California.

26 14. This Stipulated Settlement and Disciplinary Order is intended by the parties herein to
27 be an integrated writing representing the complete, final and exclusive embodiment of the
28 agreement of the parties in this above-entitled matter.

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

16. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or opportunity to be heard by the Respondent, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G 56939, issued to Respondent Donald A. Ramberg, M.D., is publicly reprimanded pursuant to California Business and Professions Code section 2227, subdivision (a)(4), and it is further ordered that Respondent comply with the following attendant terms and conditions:

1. PUBLIC REPRIMAND

The Public Reprimand issued in connection with First Amended Accusation No. 800-2018-049179, against Respondent Donald A. Ramberg, M.D. is as follows:

“You failed to accurately confirm the site of surgery in connection with Patient 1, and did not maintain adequate and accurate medical records in connection with Patient 2 by failing repeatedly to document physical examinations and to document your reasoning for performing a single level laminectomy and foraminotomy.”

2. CLINICAL COMPETENCE ASSESSMENT PROGRAM

Within 60 calendar days of the effective date of this Decision, Respondent shall enroll in a clinical competence assessment program approved in advance by the Board or its designee. Respondent shall successfully complete the program not later than six (6) months after Respondent's initial enrollment unless the Board or its designee agrees in writing to an extension of that time.

The program shall consist of a comprehensive assessment of Respondent's physical and mental health and the six general domains of clinical competence as defined by the Accreditation Council on Graduate Medical Education and American Board of Medical Specialties pertaining to Respondent's current or intended area of practice. The program shall take into account data

1 obtained from the pre-assessment, self-report forms and interview, and the Decision(s),
2 Accusation(s), and any other information that the Board or its designee deems relevant. The
3 program shall require Respondent's on-site participation for a minimum of three (3) and no more
4 than five (5) days as determined by the program for the assessment and clinical education
5 evaluation. Respondent shall pay all expenses associated with the clinical competence
6 assessment program.

7 At the end of the evaluation, the program will submit a report to the Board or its designee
8 which unequivocally states whether the Respondent has demonstrated the ability to practice
9 safely and independently. Based on Respondent's performance on the clinical competence
10 assessment, the program will advise the Board or its designee of its recommendation(s) for the
11 scope and length of any additional educational or clinical training, evaluation or treatment for any
12 medical condition or psychological condition, or anything else affecting Respondent's practice of
13 medicine. Respondent shall comply with the program's recommendations.

14 Determination as to whether Respondent successfully completed the clinical competence
15 assessment program is solely within the program's jurisdiction.

16 If Respondent fails to enroll, participate in, or successfully complete the clinical
17 competence assessment program within the designated time period, Respondent shall receive a
18 notification from the Board or its designee to cease the practice of medicine within three (3)
19 calendar days after being so notified. The Respondent shall not resume the practice of medicine
20 until enrollment or participation in the outstanding portions of the clinical competence assessment
21 program have been completed. If the Respondent did not successfully complete the clinical
22 competence assessment program, the Respondent shall not resume the practice of medicine until a
23 final decision has been rendered on the accusation. Any violation of this condition or failure to
24 complete the program and/or comply with the program recommendations shall be considered
25 unprofessional conduct and grounds for further disciplinary action.

26 **3. EDUCATION COURSES**

27 Within 60 calendar days of the effective date of this Decision, Respondent shall submit to
28 the Board or its designee for its prior approval educational program(s) or course(s), which shall

1 not be less than 40 hours. The educational program(s) or course(s) shall be aimed at correcting
2 any areas of deficient practice or knowledge and shall be Category I certified. The 40 hours of
3 educational program(s) or course(s) taken pursuant to this condition shall be at Respondent's
4 expense and shall be in addition to the Continuing Medical Education (CME) requirements for
5 renewal of licensure. Following the completion of each course, the Board or its designee may
6 administer an examination to test Respondent's knowledge of the course.

7 Respondent shall submit a certification of successful completion to the Board or its
8 designee not later than 15 calendar days after successfully completing the educational program(s)
9 or course(s). Respondent shall participate in and successfully complete the educational
10 program(s) or course(s) hereunder within one (1) year of the effective date of this Order.

11 Respondent's failure to enroll, participate in, or successfully complete the courses within
12 the designated time period, unless the Board or its designee agrees in writing to an extension of
13 that time, shall constitute general unprofessional conduct and may serve as grounds for further
14 disciplinary action.

15 **4. MEDICAL RECORD KEEPING COURSE**

16 Within 60 calendar days of the effective date of this Decision, Respondent shall enroll in a
17 course in medical record keeping approved in advance by the Board or its designee. Respondent
18 shall provide the approved course provider with any information and documents that the approved
19 course provider may deem pertinent. Respondent shall participate in and successfully complete
20 the classroom component of the course not later than six (6) months after Respondent's initial
21 enrollment. Respondent shall successfully complete any other component of the course within
22 one (1) year of enrollment. The medical record keeping course shall be at Respondent's expense
23 and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of
24 licensure.

25 A medical record keeping course taken after the acts that gave rise to the charges in the
26 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board
27 or its designee, be accepted towards the fulfillment of this condition if the course would have
28 been approved by the Board or its designee had the course been taken after the effective date of

1 this Decision.

2 Respondent shall submit a certification of successful completion to the Board or its
3 designee not later than 15 calendar days after successfully completing the course, or not later than
4 15 calendar days after the effective date of the Decision, whichever is later.

5 Respondent's failure to enroll, participate in, or successfully complete the medical record
6 keeping course within the designated time period, unless the Board or its designee agrees in
7 writing to an extension of that time, shall constitute general unprofessional conduct and may
8 serve as grounds for further disciplinary action.

9 **5. INVESTIGATION/ENFORCEMENT COST RECOVERY**

10 Respondent is hereby ordered to reimburse the Board its costs of investigation and
11 enforcement in the year of 2022, including, but not limited to, expert review, amended
12 accusations, legal reviews, investigation(s), and subpoena enforcement, as applicable, in the
13 amount of \$24,110.00 (twenty-four thousand one hundred ten dollars and zero cents). Costs shall
14 be payable to the Medical Board of California within one (1) year from the effective date of this
15 Decision.

16 Any and all requests for a payment plan shall be submitted in writing by Respondent to the
17 Board.

18 The filing of bankruptcy by Respondent shall not relieve Respondent of the responsibility
19 to repay investigation and enforcement costs.

20 **6. FAILURE TO COMPLY**

21 Failure to comply with any of the terms of this Disciplinary Order shall constitute general
22 unprofessional conduct and may serve as grounds for further disciplinary action. In such
23 circumstances, the Complainant may reinstate First Amended Accusation No. 800-2018-049179
24 or file a supplemental accusation alleging any failure to comply with any provision of this order
25 by Respondent as unprofessional conduct.

26 **7. FUTURE ADMISSIONS CLAUSE**

27 If Respondent should ever apply or reapply for a new license or certification, or petition for
28 reinstatement of a license, by any other health care licensing action agency in the State of

1 California, all of the charges and allegations contained in First Amended Accusation No. 800-
2 2018-049179 shall be deemed to be true, correct, and admitted by Respondent for the purpose of
3 any Statement of Issues or any other proceeding seeking to deny or restrict license.

4 ACCEPTANCE

5 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
6 discussed it with my attorney, Mark B. Connely. I understand the stipulation and the effect it will
7 have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and
8 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
9 Decision and Order of the Medical Board of California.

10
11 DATED: 9/8/2022

Donald A. Ramberg, M.D.
DONALD A. RAMBERG, M.D.
Respondent

14 I have read and fully discussed with Respondent Donald A. Ramberg, M.D. the terms and
15 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
16 I approve its form and content.

17
18 DATED: Sept. 9, 2022

Mark B. Connely
MARK B. CONNELLY, ESQ.
Attorney for Respondent

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24 [Endorsement on following page]

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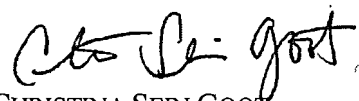
ENDORSEMENT

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

DATED: 9/9/2022

Respectfully submitted,

ROB BONTA
Attorney General of California
EDWARD KIM
Supervising Deputy Attorney General


CHRISTINA SEIN GOOT
Deputy Attorney General
Attorneys for Complainant

LA2020601143

Exhibit A

First Amended Accusation No. 800-2018-049179

1 ROB BONTA
Attorney General of California
2 ROBERT MCKIM BELL
Supervising Deputy Attorney General
3 CHRISTINA SEIN GOOT
Deputy Attorney General
4 State Bar No. 229094
California Department of Justice
5 300 South Spring Street, Suite 1702
Los Angeles, CA 90013
6 Telephone: (213) 269-6481
Facsimile: (916) 731-2117
7 *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 First Amended Accusation
13 Against:

Case No. 800-2018-049179

14 DONALD A. RAMBERG, M.D.
699 California Boulevard, Suite B
15 San Luis Obispo, CA 93401

FIRST AMENDED ACCUSATION

16 Physician's and Surgeon's Certificate
No. G 56939,

17 Respondent.
18

19
20 **PARTIES**

21 1. William Prasifka (Complainant) brings this First Amended Accusation solely in his
22 official capacity as the Executive Director of the Medical Board of California (Board).

23 2. On March 31, 1986, the Board issued Physician's and Surgeon's Certificate Number
24 G 56939 to Donald A. Ramberg, M.D. (Respondent). That license was in full force and effect at
25 all times relevant to the charges brought herein and will expire on July 31, 2023, unless renewed.

26 **JURISDICTION**

27 3. This First Amended Accusation is brought before the Board under the authority of the
28 following laws. All section references are to the Business and Professions Code (Code) unless

1 otherwise indicated.

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

6 5. Section 2234 of the Code states:

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

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

11 (b) Gross negligence.

12 (c) Repeated negligent acts. To be repeated, there must be two or more
13 negligent acts or omissions. An initial negligent act or omission followed by a
separate and distinct departure from the applicable standard of care shall constitute
repeated negligent acts.

14 (1) An initial negligent diagnosis followed by an act or omission medically
15 appropriate for that negligent diagnosis of the patient shall constitute a single
negligent act.

16 (2) When the standard of care requires a change in the diagnosis, act, or
17 omission that constitutes the negligent act described in paragraph (1), including, but
18 not limited to, a reevaluation of the diagnosis or a change in treatment, and the
licensee's conduct departs from the applicable standard of care, each departure
constitutes a separate and distinct breach of the standard of care.

19 (d) Incompetence.

20 (e) The commission of any act involving dishonesty or corruption that is
21 substantially related to the qualifications, functions, or duties of a physician and
surgeon.

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

23 (g) The failure by a certificate holder, in the absence of good cause, to attend
24 and participate in an interview by the board. This subdivision shall only apply to a
certificate holder who is the subject of an investigation by the board.

25
26 6. Section 2266 of the Code states: The failure of a physician and surgeon to maintain
27 adequate and accurate records relating to the provision of services to their patients constitutes
28 unprofessional conduct.

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Gross Negligence – Patients 1 and 2)**

3 7. Respondent is subject to disciplinary action under section 2234, subdivision (b), of
4 the Code in that he committed gross negligence in his care and treatment of Patients 1 and 2.¹
5 The circumstances are as follows:

6 8. At all times relevant to the allegations herein, Respondent was a physician practicing
7 neurological surgery.

8 **Patient 1**

9 9. Patient 1, a 73-year-old male, was referred to Respondent for evaluation of neck pain.
10 On July 12, 2018, Respondent's assessment of Patient 1 was cervical spondylosis with
11 myelopathy. Respondent subsequently requested prior authorization for an anterior cervical
12 discectomy and fusion at the C5-6 and C6-7 levels. The surgery was approved, and Patient 1
13 signed a consent form for surgery at these levels.

14 10. On August 10, 2018, Respondent performed the surgery; however, there was an
15 inadvertent extension of the fusion to the C7-T1 level. Although Respondent performed X-rays
16 during surgery, the surgical marker's tip was not visible on the X-ray performed at 11:20:50.
17 Respondent did not perform any other X-rays before proceeding with the discectomy and as a
18 direct result, proceeded to treat C6-7 and C7-T1, instead of C5-6 and C6-7. Rather than marking
19 a more cephalad level and repeating the X-ray to confirm the site, Respondent made assumptions
20 about anterior osteophytes.

21 11. The standard of care requires that a physician accurately confirm the site of surgery.
22 When operating on the spine, this site confirmation includes ensuring the correct operative level
23 with radiographic imaging.

24 12. Respondent should have recognized that the X-ray was insufficient to confirm the
25 operative level and, rather than make assumptions about anterior osteophytes, proceeded with an
26 additional X-ray where the tip of the surgical marker could have been visualized at an identifiable
27 level. This represents an extreme departure from the standard of care.

28 ¹ The patient are referred to by number to protect their privacy..

1 **Patient 2**

2 13. On July 3, 2014, Patient 2, a 55-year-old male, first presented to Respondent with
3 complaints of back pain and leg weakness. Patient 2 had a history of L5-S1 fusion and L4-5
4 laminotomy,² medial fascetectomy,³ and foraminotomy.⁴ On July 23, 2014, Respondent
5 performed a bilateral L4-5 laminectomy and foraminotomy.

6 14. Patient 2 followed up and/or treated with Respondent on August 5, 2014; August 21,
7 2014; October 2, 2014; November 13, 2014; January 3, 2015; and January 29, 2015. Respondent
8 did not document a physical examination at these visits.

9 15. On February 25, 2015, Patient 2 reported a history of cervical pain with radiation into
10 both arms and a failure of physical therapy and pain management to relieve the pain. Physical
11 examination revealed restricted cervical range of motion with pain radiating out the left arm. On
12 this date, Respondent performed a left C3-4 laminectomy and foraminotomy after discussing the
13 risks and benefits of the procedure with Patient 2.

14 16. From March 17, 2015 through June 23, 2015, Respondent saw Patient 2 for follow-up
15 visits. Respondent documented a physical examination of Patient 2's wound on March 17, 2015.
16 Respondent did not document a physical examination at any other visit during this time period.

17 17. From July 2015 through November 2018, Respondent regularly saw Patient 2 for
18 treatment and/or follow-up. Respondent consistently failed to document physical examinations at
19 these visits.

20 18. On January 16, 2019, Patient 2 is noted to have worsening back and leg pain.
21 Although Respondent documented a physical examination, no sensory examination is recorded.
22 Respondent recommended a repeat MRI of the lumbar spine, last performed on July 27, 2017, in
23 anticipation of surgery "so that an assessment of the surgery needed is updated." On this date,
24 despite the lack of the repeat MRI as ordered, Respondent performed a bilateral L3-4

25 ² A laminotomy is an orthopedic neurosurgical procedure that removes part of the lamina
26 of a vertebral arch in order to relieve pressure in the vertebral canal.

27 ³ Facetectomy is a surgical procedure which involves decompression of a spinal nerve
28 root.

⁴ Foraminotomy is a surgical procedure to relieve pressure on compressed nerves.

1 laminectomy and discectomy with interbody and posterolateral instrumented fusion, attaching it
2 to the prior construct at L4-S1.

3 19. Respondent saw Patient 2 for follow-up visits on March 28, 2019; May 7, 2019;
4 September 5, 2019; and October 31, 2019. Again, Respondent did not document any physical
5 examination at these visits.

6 20. The standard of care requires that a physician produce and maintain accurate medical
7 records of the care provided, including both positive and negative pertinent aspects of the history
8 and physical examination.

9 21. Respondent's repeated failure to document a physical examination represents an
10 extreme departure from the standard of care.

11 22. The standard of care requires a physician to recommend and perform surgical
12 interventions that have a reasonable chance of providing efficacy. There needs to be a sufficient
13 correlation between the patient's presenting complaints, the physical examination findings, the
14 results of diagnostic testing, and the expected outcome from surgery.

15 23. The left C3-4 laminectomy and foraminotomy performed by Respondent on February
16 25, 2015 would not address Patient 2's pre-operative condition. An MRI of the cervical spine
17 performed pre-operatively on January 23, 2015, revealed foraminal stenosis on the left at C3-4 and
18 on the right at C5-6 and C6-7. Patient 2 had three-level degenerative disease in the cervical spine
19 and only one level was addressed with the surgery. Respondent should have known that Patient
20 2's pre-operative condition would not have been expected to improve with a single level
21 laminectomy and foraminotomy. Respondent also performed a lumbar fusion at L3-4 on January
22 16, 2019, based on an MRI of the lumbar spine obtained on July 27, 2017. Although Respondent
23 recommended a repeat MRI prior to surgery, he did not follow his own recommendation to ensure
24 the appropriateness of his surgical recommendation. Respondent's performance of these surgeries
25 under these circumstances, given the inherent risks of surgery, represents an extreme departure
26 from the standard of care.

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1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Repeated Negligent Acts – Patients 1 and 2)**

3 24. Respondent is subject to disciplinary action under section 2234, subdivision (c), of
4 the Code in that he committed repeated negligent acts in his care and treatment of Patients 1 and
5 2. The circumstances are as follows:

6 25. The allegations of the First Cause for Discipline are incorporated by reference as if
7 fully set forth herein.

8 **THIRD CAUSE FOR DISCIPLINE**

9 **(Failure to Maintain Adequate Records – Patient 2)**

10 26. Respondent is subject to disciplinary action under section 2266 of the Code in that he
11 failed to maintain adequate and accurate records concerning the care and treatment of Patient 2.
12 The circumstances are as follows:

13 27. Complainant refers to and, by this reference, incorporates paragraphs 13-21, above, as
14 though set forth fully herein.

15 **PRAYER**

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

18 1. Revoking or suspending Physician's and Surgeon's Certificate Number G 56939,
19 issued to Respondent Donald A. Ramberg, M.D.;

20 2. Revoking, suspending or denying approval of Respondent Donald A. Ramberg,
21 M.D.'s authority to supervise physician assistants and advanced practice nurses;

22 3. If placed on probation, ordering Respondent Donald A. Ramberg, M.D. to pay the
23 Board the costs of probation monitoring; and

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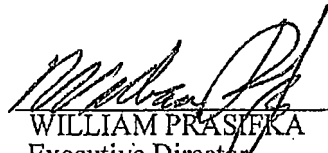
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4. Taking such other and further action as deemed necessary and proper.

DATED: OCT 12 2021



WILLIAM PRASIEKA
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California

Complainant

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