

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

In the Matter of the Accusation  
Against:

Klerman Hale Morrow, M.D.

Physician's and Surgeon's  
Certificate No. C 156513

Respondent.

Case No. 800-2022-084677

DECISION

The attached Stipulated Surrender of License and 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 July 5, 2024.

IT IS SO ORDERED June 28, 2024.

MEDICAL BOARD OF CALIFORNIA



Reji Varghese  
Executive Director

1 ROB BONTA  
Attorney General of California  
2 JUDITH T. ALVARADO  
Supervising Deputy Attorney General  
3 REBECCA L. SMITH  
Deputy Attorney General  
4 State Bar No. 179733  
300 South Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6475  
6 Facsimile: (916) 731-2117  
*Attorneys for Complainant*  
7

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

12 In the Matter of the Accusation Against:

Case No. 800-2022-084677

13 **KIERNAN HALE MORROW, M.D.**  
14 **1525 West Cypress Creek Road**  
**Fort Lauderdale, Florida 33309**

OAH No. 2023120210

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

15 **Physician's and Surgeon's Certificate**  
16 **No. C 156513,**

Respondent.

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. Reji Varghese (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 Rebecca L. Smith, Deputy  
24 Attorney General.

25 2. Kiernan Hale Morrow, M.D. (Respondent) is represented in this proceeding by  
26 attorney Robert Keith Weinberg, whose address is 19200 Von Karman Avenue, Suite 380  
27 Irvine, California 92612-8508.

28 ///

1 3. On or about June 15, 2018, the Board issued Physician's and Surgeon's Certificate  
2 No. C 156513 to Respondent. That license was in full force and effect at all times relevant to the  
3 charges brought in Accusation No. 800-2022-084677 and expired on January 31, 2024.

4 **JURISDICTION**

5 4. Accusation No. 800-2022-084677 was filed before the Board, and is currently  
6 pending against Respondent. The Accusation and all other statutorily required documents were  
7 properly served on Respondent on October 30, 2023. Respondent filed his Notice of Defense  
8 contesting the Accusation. A copy of Accusation No. 800-2022-084677 is attached as Exhibit A  
9 and incorporated by reference.

10 **ADVISEMENT AND WAIVERS**

11 5. Respondent has carefully read, fully discussed with counsel, and understands the  
12 charges and allegations in Accusation No. 800-2022-084677. Respondent also has carefully read,  
13 fully discussed with counsel, and understands the effects of this Stipulated Surrender of License  
14 and Order.

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

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

23 **CULPABILITY**

24 8. Respondent understands that the charges and allegations in Accusation No. 800-2022-  
25 084677, if proven at a hearing, constitute cause for imposing discipline upon his Physician's and  
26 Surgeon's Certificate.

27 9. For the purpose of resolving the Accusation without the expense and uncertainty of  
28 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual

1 basis for the charges in the Accusation and that those charges constitute cause for discipline.  
2 Respondent hereby gives up his right to contest that cause for discipline exists based on those  
3 charges.

4 10. Respondent understands that by signing this stipulation he enables the Board to issue  
5 an order accepting the surrender of his Physician's and Surgeon's Certificate without further  
6 process.

### 7 CONTINGENCY

8 11. Business and Professions Code section 2224, subdivision (b), provides, in pertinent  
9 part, that the Medical Board "shall delegate to its executive director the authority to adopt a ...  
10 stipulation for surrender of a license."

11 12. Respondent understands that, by signing this stipulation, he enables the Executive  
12 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his  
13 Physician's and Surgeon's Certificate No. C 156513 without further notice to, or opportunity to be  
14 heard by, Respondent.

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

23 14. The parties agree that this Stipulated Surrender of License and Disciplinary Order  
24 shall be null and void and not binding upon the parties unless approved and adopted by the  
25 Executive Director on behalf of the Board, except for this paragraph, which shall remain in full  
26 force and effect. Respondent fully understands and agrees that in deciding whether or not to  
27 approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Executive  
28 Director and/or the Board may receive oral and written communications from its staff and/or the

1 Attorney General's Office. Communications pursuant to this paragraph shall not disqualify the  
2 Executive Director, the Board, any member thereof, and/or any other person from future  
3 participation in this or any other matter affecting or involving Respondent. In the event that the  
4 Executive Director on behalf of the Board does not, in his discretion, approve and adopt this  
5 Stipulated Surrender of License and Disciplinary Order, with the exception of this paragraph, it  
6 shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied  
7 upon or introduced in any disciplinary action by either party hereto. Respondent further agrees  
8 that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason  
9 by the Executive Director on behalf of the Board, Respondent will assert no claim that the  
10 Executive Director, the Board, or any member thereof, was prejudiced by its/his/her review,  
11 discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or  
12 of any matter or matters related hereto.

#### 13 ADDITIONAL PROVISIONS

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

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

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

#### 23 ORDER

24 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. C 156513,  
25 issued to Respondent Kiernan Hale Morrow, M.D., is surrendered and accepted by the Board.

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

1 of Respondent's license history with the Board.

2 2. Respondent shall lose all rights and privileges as a physician and surgeon in  
3 California as of the effective date of the Board's Decision and Order.

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

6 4. If Respondent ever files an application for licensure or a petition for reinstatement in  
7 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
8 comply with all the laws, regulations and procedures for reinstatement of a revoked or  
9 surrendered license in effect at the time the petition is filed, and all of the charges and allegations  
10 contained in Accusation No. 800-2022-084677 shall be deemed to be true, correct and admitted  
11 by Respondent when the Board determines whether to grant or deny the petition.

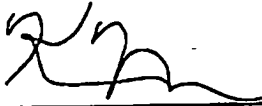
12 5. Respondent shall pay the Board its costs of investigation and enforcement in the  
13 amount of \$43,696.50 prior to issuance of a new or reinstated license.

14 6. If Respondent should ever apply or reapply for a new license or certification, or  
15 petition for reinstatement of a license, by any other health care licensing agency in the State of  
16 California, all of the charges and allegations contained in Accusation No. 800-2022-084677 shall  
17 be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
18 Issues or any other proceeding seeking to deny or restrict licensure.

19 ACCEPTANCE

20 I have carefully read the above Stipulated Surrender of License and Order and have fully  
21 discussed it with my attorney Robert Keith Weinberg. I understand the stipulation and the effect  
22 it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of  
23 License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
24 Decision and Order of the Medical Board of California.

25  
26 DATED: 6/19/24

  
27 KIERNAN HALE MORROW, M.D.  
28 Respondent

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

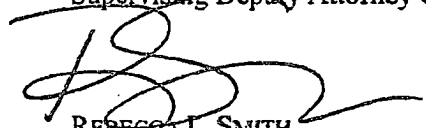
DATED: 6-19-24   
ROBERT KEITH WEINBERG  
*Attorney for Respondent*

**ENDORSEMENT**

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Medical Board of California of the Department of Consumer Affairs.

DATED: 06/19/2024

Respectfully submitted,  
ROB BONTA  
Attorney General of California  
JUDITH T. ALVARADO  
~~Supervising Deputy Attorney General~~

  
REBECCA L. SMITH  
Deputy Attorney General  
*Attorneys for Complainant*

LA2023603184  
66870807.docx

**Exhibit A**

**Accusation No. 800-2022-084677**



1 ROB BONTA  
Attorney General of California  
2 JUDITH T. ALVARADO  
Supervising Deputy Attorney General  
3 REBECCA L. SMITH  
Deputy Attorney General  
4 State Bar No. 179733  
300 South Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6475  
6 Facsimile: (916) 731-2117  
*Attorneys for Complainant*  
7

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

12 In the Matter of the Accusation Against:

Case No. 800-2022-084677

13 **KIERNAN HALE MORROW, M.D.**  
14 **1525 W. Cypress Creek Rd.**  
**Fort Lauderdale, FL 33309**

**ACCUSATION**

15 **Physician's and Surgeon's Certificate**  
16 **No. C 156513,**

Respondent.

17  
18  
19 **PARTIES**

20 1. Reji Varghese (Complainant) brings this Accusation solely in his official capacity as  
21 the Executive Director of the Medical Board of California, Department of Consumer Affairs  
22 (Board).

23 2. On or about June 15, 2018, the Medical Board issued Physician's and Surgeon's  
24 Certificate Number C 156513 to Kiernan Hale Morrow, M.D. (Respondent). That license was in  
25 full force and effect at all times relevant to the charges brought herein and will expire on January  
26 31, 2024, unless renewed.

27 ///

28 ///

1 JURISDICTION

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

5 4. Section 2004 of the Code states:

6 The board shall have the responsibility for the following:

7 (a) The enforcement of the disciplinary and criminal provisions of the Medical  
8 Practice Act.

9 (b) The administration and hearing of disciplinary actions.

10 (c) Carrying out disciplinary actions appropriate to findings made by a panel or  
an administrative law judge.

11 (d) Suspending, revoking, or otherwise limiting certificates after the conclusion  
12 of disciplinary actions.

13 (e) Reviewing the quality of medical practice carried out by physician and  
surgeon certificate holders under the jurisdiction of the board.

14 (f) Approving undergraduate and graduate medical education programs.

15 (g) Approving clinical clerkship and special programs and hospitals for the  
16 programs in subdivision (f).

17 (h) Issuing licenses and certificates under the board's jurisdiction.

18 (i) Administering the board's continuing medical education program.

19 5. Section 2227 of the Code states:

20 (a) A licensee whose matter has been heard by an administrative law judge of  
21 the Medical Quality Hearing Panel as designated in Section 11371 of the Government  
22 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:

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

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

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

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

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

3 (b) Any matter heard pursuant to subdivision (a), except for warning letters,  
4 medical review or advisory conferences, professional competency examinations,  
5 continuing education activities, and cost reimbursement associated therewith that are  
6 agreed to with the board and successfully completed by the licensee, or other matters  
7 made confidential or privileged by existing law, is deemed public, and shall be made  
8 available to the public by the board pursuant to Section 803.1.

### 6 STATUTORY PROVISIONS

7 6. Section 820 of the Code states:

8 Whenever it appears that any person holding a license, certificate or permit  
9 under this division or under any initiative act referred to in this division may be  
10 unable to practice his or her profession safely because the licentiate's ability to  
11 practice is impaired due to mental illness, or physical illness affecting competency,  
12 the licensing agency may order the licentiate to be examined by one or more  
13 physicians and surgeons or psychologists designated by the agency. The report of the  
14 examiners shall be made available to the licentiate and may be received as direct  
15 evidence in proceedings conducted pursuant to Section 822.

16 7. Section 821 of the Code provides that the licentiate's failure to comply with an order  
17 issued under section 820 shall constitute grounds for the suspension or revocation of the  
18 licentiate's certificate or license.

19 8. Section 2234 of the Code, states:

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

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

25 (b) Gross negligence.

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

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

(2) When the standard of care requires a change in the diagnosis, act, or  
omission that constitutes the negligent act described in paragraph (1), including, but  
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.

///

1 (d) Incompetence.

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

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

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

9 9. Section 2228.1 of the Code states.

10 (a) On and after July 1, 2019, except as otherwise provided in subdivision (c),  
11 the board and the Podiatric Medical Board of California shall require a licensee to  
12 provide a separate disclosure that includes the licensee's probation status, the length  
13 of the probation, the probation end date, all practice restrictions placed on the licensee  
14 by the board, the board's telephone number, and an explanation of how the patient  
15 can find further information on the licensee's probation on the licensee's profile page  
16 on the board's online license information internet web site, to a patient or the  
17 patient's guardian or health care surrogate before the patient's first visit following the  
18 probationary order while the licensee is on probation pursuant to a probationary order  
19 made on and after July 1, 2019, in any of the following circumstances:

20 (1) A final adjudication by the board following an administrative hearing or  
21 admitted findings or prima facie showing in a stipulated settlement establishing any  
22 of the following:

23 (A) The commission of any act of sexual abuse, misconduct, or relations with a  
24 patient or client as defined in Section 726 or 729.

25 (B) Drug or alcohol abuse directly resulting in harm to patients or the extent  
26 that such use impairs the ability of the licensee to practice safely.

27 (C) Criminal conviction directly involving harm to patient health.

28 (D) Inappropriate prescribing resulting in harm to patients and a probationary  
period of five years or more.

(2) An accusation or statement of issues alleged that the licensee committed any  
of the acts described in subparagraphs (A) to (D), inclusive, of paragraph (1), and a  
stipulated settlement based upon a nolo contendere or other similar compromise that  
does not include any prima facie showing or admission of guilt or fact but does  
include an express acknowledgment that the disclosure requirements of this section  
would serve to protect the public interest.

(b) A licensee required to provide a disclosure pursuant to subdivision (a) shall  
obtain from the patient, or the patient's guardian or health care surrogate, a separate,  
signed copy of that disclosure.

(c) A licensee shall not be required to provide a disclosure pursuant to  
subdivision (a) if any of the following applies:

(1) The patient is unconscious or otherwise unable to comprehend the  
disclosure and sign the copy of the disclosure pursuant to subdivision (b) and a

1 guardian or health care surrogate is unavailable to comprehend the disclosure and  
2 sign the copy.

3 (2) The visit occurs in an emergency room or an urgent care facility or the visit  
4 is unscheduled, including consultations in inpatient facilities.

5 (3) The licensee who will be treating the patient during the visit is not known to  
6 the patient until immediately prior to the start of the visit.

7 (4) The licensee does not have a direct treatment relationship with the patient.

8 (d) On and after July 1, 2019, the board shall provide the following  
9 information, with respect to licensees on probation and licensees practicing under  
10 probationary licenses, in plain view on the licensee's profile page on the board's  
11 online license information internet web site.

12 (1) For probation imposed pursuant to a stipulated settlement, the causes  
13 alleged in the operative accusation along with a designation identifying those causes  
14 by which the licensee has expressly admitted guilt and a statement that acceptance of  
15 the settlement is not an admission of guilt.

16 (2) For probation imposed by an adjudicated decision of the board, the causes  
17 for probation stated in the final probationary order.

18 (3) For a licensee granted a probationary license, the causes by which the  
19 probationary license was imposed.

20 (4) The length of the probation and end date.

21 (5) All practice restrictions placed on the license by the board.

22 (e) Section 2314 shall not apply to this section.

### 23 COST RECOVERY

24 10. Section 125.3 of the Code states:

25 (a) Except as otherwise provided by law, in any order issued in resolution of a  
26 disciplinary proceeding before any board within the department or before the  
27 Osteopathic Medical Board, upon request of the entity bringing the proceeding, the  
28 administrative law judge may direct a licensee found to have committed a violation or  
violations of the licensing act to pay a sum not to exceed the reasonable costs of the  
investigation and enforcement of the case.

(b) In the case of a disciplined licensee that is a corporation or a partnership, the  
order may be made against the licensed corporate entity or licensed partnership.

(c) A certified copy of the actual costs, or a good faith estimate of costs where  
actual costs are not available, signed by the entity bringing the proceeding or its  
designated representative shall be prima facie evidence of reasonable costs of  
investigation and prosecution of the case. The costs shall include the amount of  
investigative and enforcement costs up to the date of the hearing, including, but not  
limited to, charges imposed by the Attorney General.

(d) The administrative law judge shall make a proposed finding of the amount  
of reasonable costs of investigation and prosecution of the case when requested.

1 pursuant to subdivision (a). The finding of the administrative law judge with regard  
2 to costs shall not be reviewable by the board to increase the cost award. The board  
3 may reduce or eliminate the cost award, or remand to the administrative law judge if  
4 the proposed decision fails to make a finding on costs requested pursuant to  
5 subdivision (a).

6 (e) If an order for recovery of costs is made and timely payment is not made as  
7 directed in the board's decision, the board may enforce the order for repayment in any  
8 appropriate court. This right of enforcement shall be in addition to any other rights  
9 the board may have as to any licensee to pay costs.

10 (f) In any action for recovery of costs, proof of the board's decision shall be  
11 conclusive proof of the validity of the order of payment and the terms for payment.

12 (g) (1) Except as provided in paragraph (2), the board shall not renew or  
13 reinstate the license of any licensee who has failed to pay all of the costs ordered  
14 under this section.

15 (2) Notwithstanding paragraph (1), the board may, in its discretion,  
16 conditionally renew or reinstate for a maximum of one year the license of any  
17 licensee who demonstrates financial hardship and who enters into a formal agreement  
18 with the board to reimburse the board within that one-year period for the unpaid  
19 costs.

20 (h) All costs recovered under this section shall be considered a reimbursement  
21 for costs incurred and shall be deposited in the fund of the board recovering the costs  
22 to be available upon appropriation by the Legislature.

23 (i) Nothing in this section shall preclude a board from including the recovery of  
24 the costs of investigation and enforcement of a case in any stipulated settlement.

25 (j) This section does not apply to any board if a specific statutory provision in  
26 that board's licensing act provides for recovery of costs in an administrative  
27 disciplinary proceeding.

### 28 FIRST CAUSE FOR DISCIPLINE

#### (Failure To Comply With An Order Issued Under Section 820)

11. Respondent is subject to disciplinary action under Section 821 of the Code in that he  
failed to comply with an order issued under Section 820 of the Code, as more particularly alleged  
hereinafter:

12. On or about April 28, 2023, the Board issued an order pursuant to Code section 820  
(Order) compelling Respondent to undergo mental and physical examinations to determine  
whether he was impaired by a mental or physical illness affecting his competency to practice  
medicine. The Order required that Respondent submit to a physical and a mental examination,  
each within thirty (30) days of service of the Order. The Board's Order was served on

1 Respondent's address of record on or about April 28, 2023.

2 13. On or about May 2, 2023, a Department of Consumer Affairs investigator  
3 (Investigator), on behalf of the Board, mailed the Board's Order via certified and regular mail to  
4 Respondent's address of record.

5 14. On or about May 9, 2023, the Investigator mailed a letter to Respondent which  
6 provided the details of the physical examination, which had been scheduled for him on May 22,  
7 2023, pursuant to the Order. That same day, the Investigator also mailed a letter to Respondent  
8 which provided the details of the mental examination, which had been scheduled for him on May  
9 24, 2023, pursuant to the Order.

10 15. On or about May 10, 2023, the Investigator received confirmation of the delivery of  
11 the two letters to Respondent.

12 16. Thereafter, the Investigator continued to attempt to coordinate the mental and  
13 physical examinations with Respondent.

14 17. Respondent failed to attend both the mental and physical examinations which had  
15 been scheduled for him, and failed to comply with the Board's Order.

16 **SECOND CAUSE FOR DISCIPLINE**

17 **(General Unprofessional Conduct)**

18 18. Respondent is subject to disciplinary action under Code section 2234, in that his  
19 actions and/or omissions represent unprofessional conduct, generally. The circumstances are as  
20 follows:

21 19. The allegations of the First Cause for Discipline are incorporated herein by reference  
22 as if fully set forth.

23 **PRAYER**

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

26 1. Revoking or suspending Physician's and Surgeon's Certificate Number C 156513,  
27 issued to Respondent Kiernan Hale Morrow, M.D.;

28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

2. Revoking, suspending or denying approval of Respondent Kiernan Hale Morrow, M.D.'s authority to supervise physician assistants and advanced practice nurses;

3. Ordering Respondent Kiernan Hale Morrow, M.D., to pay the Board the costs of the investigation and enforcement of this case, and if placed on probation, the costs of probation monitoring;

4. Ordering Respondent Kiernan Hale Morrow, M.D., if placed on probation, to provide patient notification in accordance with Business and Professions Code section 2228.1; and

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

DATED: OCT 30 2023



REJI VARGHESE  
Executive Director  
Medical Board of California  
Department of Consumer Affairs  
State of California  
*Complainant*

LA2023603184  
66176403.docx