

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

In the Matter of the Accusation Against:

Friederike Carla Von Lintig, M.D.

**Physician's and Surgeon's
Certificate No. A 84284**

Case No. 800-2021-079384

Respondent.

DECISION

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

This Decision shall become effective at 5:00 p.m. on September 27, 2024.

IT IS SO ORDERED September 20, 2024.

MEDICAL BOARD OF CALIFORNIA



**Reji Varghese
Executive Director**

1 ROB BONTA
Attorney General of California
2 ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
3 KAROLYN M. WESTFALL
Deputy Attorney General
4 State Bar No. 234540
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
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7 Facsimile: (619) 645-2061

8 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:

Case No. 800-2021-079384

14 **FRIEDERIKE CARLA VON LINTIG, M.D.**
2815 S Grade Road
15 Alpine, CA 91901

OAH No. 2024030370

16 **Physician's and Surgeon's Certificate**
No. A 84284,

**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. Reji Varghese (Complainant) is the Executive Director of the Medical Board of
23 California (Board). He brought this action solely in his official capacity and is represented in this
24 matter by Rob Bonta, Attorney General of the State of California, by Karolyn M. Westfall,
25 Deputy Attorney General.

26 2. Friederike Carla Von Lintig, M.D. (Respondent) is represented in this proceeding by
27 attorneys Jeffrey S. Doggett Esq., and Katie K. Schuler, Esq., whose address is: Law Offices of
28 Lotz, Doggett & Rawers, LLP, 101 West Broadway, Suite 1330, San Diego, CA 92101.

3. On or about August 8, 2003, the Medical Board issued Physician's and Surgeon's Certificate No. A 84284 to Respondent. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2021-079384, and will expire on November 30, 2024, unless renewed.

4. On or about July 3, 2023, an Interim Order of Suspension was issued by the Office of Administrative Hearings, immediately suspending Physician's and Surgeon's Certificate No. A 84284 and prohibiting Respondent from practicing medicine in the State of California. As a result, Respondent remains suspended from the practice of medicine pending the issuance of a final decision on Accusation No. 800-2021-079384.

JURISDICTION

5. Accusation No. 800-2021-079384 was filed before the Board and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on October 3, 2023. Respondent timely filed her Notice of Defense contesting the Accusation. A true and correct copy of Accusation No. 800-2021-079384 is attached hereto as Exhibit A and is incorporated by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, and fully understands the charges and allegations in Accusation No. 800-2021-079384. Respondent also has carefully read, and fully understands the effects of this Stipulated Surrender of License and Disciplinary Order.

7. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her 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. Having the benefit of counsel, Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

1 **CULPABILITY**

2 9. Respondent admits that, at an administrative hearing, Complainant could establish a
3 *prima facie* case with respect to the charges and allegations contained in Accusation No. 800-
4 2021-079384, agrees that she has thereby subjected her Physician's and Surgeon's Certificate No.
5 A 84284 to disciplinary action, and hereby surrenders her Physician's and Surgeon's Certificate
6 No. A 84284 for the Board's formal acceptance.

7 10. Respondent further agrees that if she ever petitions for reinstatement, or if an
8 accusation is filed against her before the Medical Board of California, all of the charges and
9 allegations contained in Accusation No. 800-2021-079384 shall be deemed true, correct, and fully
10 admitted by Respondent for purposes of any such proceeding or any other licensing proceeding
11 involving Respondent in the State of California or elsewhere.

12 11. Respondent understands that by signing this stipulation she enables the Board to issue
13 an order accepting the surrender of her Physician's and Surgeon's Certificate without further
14 process.

15 **CONTINGENCY**

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

19 13. Respondent understands that, by signing this stipulation, she enables the Executive
20 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of her
21 Physician's and Surgeon's Certificate No. A 84284 without further notice to, or opportunity to be
22 heard by, Respondent.

23 14. This Stipulated Surrender of License and Disciplinary Order shall be subject to the
24 approval of the Executive Director on behalf of the Board. The parties agree that this Stipulated
25 Surrender of License and Disciplinary Order shall be submitted to the Executive Director for his
26 consideration in the above-entitled matter and, further, that the Executive Director shall have a
27 reasonable period of time in which to consider and act on this Stipulated Surrender of License and
28 Disciplinary Order after receiving it. By signing this stipulation, Respondent fully understands

1 and agrees that she may not withdraw her agreement or seek to rescind this stipulation prior to the
2 time the Executive Director, on behalf of the Medical Board, considers and acts upon it.

3 15. The parties agree that this Stipulated Surrender of License and Disciplinary Order
4 shall be null and void and not binding upon the parties unless approved and adopted by the
5 Executive Director on behalf of the Board, except for this paragraph, which shall remain in full
6 force and effect. Respondent fully understands and agrees that in deciding whether or not to
7 approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Executive
8 Director and/or the Board may receive oral and written communications from its staff and/or the
9 Attorney General's Office. Communications pursuant to this paragraph shall not disqualify the
10 Executive Director, the Board, any member thereof, and/or any other person from future
11 participation in this or any other matter affecting or involving Respondent. In the event that the
12 Executive Director on behalf of the Board does not, in his discretion, approve and adopt this
13 Stipulated Surrender of License and Disciplinary Order, with the exception of this paragraph, it
14 shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied
15 upon or introduced in any disciplinary action by either party hereto. Respondent further agrees
16 that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason
17 by the Executive Director on behalf of the Board, Respondent will assert no claim that the
18 Executive Director, the Board, or any member thereof, was prejudiced by its/his/her review,
19 discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or
20 of any matter or matters related hereto.

21 ADDITIONAL PROVISIONS

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

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

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

ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 84284, issued to Respondent Friederike Carla Von Lintig, M.D., is surrendered and accepted by the Board.

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

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

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

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked or surrendered license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 800-2021-079384 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. Respondent shall pay the agency its costs of investigation and enforcement in the amount of \$61,508.00 (sixty-one thousand five hundred and eight dollars and zero cents) prior to issuance of a new or reinstated license.

6. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 800-2021-079384 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

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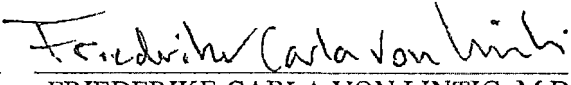
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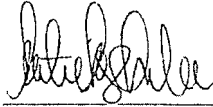
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ACCEPTANCE

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

DATED: 09/06/2024 
FRIEDERIKE CARLA VON LINTIG, M.D.
Respondent

I have read and fully discussed with Respondent Friederike Carla Von Lintig, M.D., the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: September 13, 2024

JEFFREY S. DOGGETT, ESQ.
KATIE K. SCHULER, ESQ.
Attorneys 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: 9/13/24 Respectfully submitted,

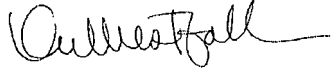
ROB BONTA
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General

KAROLYN M. WESTFALL
Deputy Attorney General
Attorneys for Complainant

Exhibit A

Accusation No. 800-2021-079384

1 ROB BONTA
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10 **BEFORE THE**
11 **MEDICAL BOARD OF CALIFORNIA**
12 **DEPARTMENT OF CONSUMER AFFAIRS**
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13 In the Matter of the Accusation Against:

Case No. 800-2021-079384

14 **FRIEDERIKE CARLA VON LINTIG, M.D.**
2815 S Grade Road
15 Alpine, CA 91901

A C C U S A T I O N

16 **Physician's and Surgeon's Certificate**
17 **No. A 84284,**

18 **Respondent.**

19
20 **PARTIES**

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

24 2. On or about August 8, 2003, the Medical Board issued Physician's and Surgeon's
25 Certificate No. A 84284 to Friederike Carla Von Lintig, M.D. (Respondent). The Physician's and
26 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
27 herein and will expire on November 30, 2024, unless renewed.

28 ///

3. On or about July 3, 2023, an Interim Order of Suspension was issued by the Office of Administrative Hearings, immediately suspending Physician's and Surgeon's Certificate No. A 84284 and prohibiting Respondent from practicing medicine in the State of California. As a result, Respondent remains suspended from the practice of medicine pending the issuance of a final decision after an administrative hearing on the Accusation.

JURISDICTION

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

5. Section 2227 of the Code states, in pertinent part:

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

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

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

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

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

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

...

6. Section 2234 of the Code, states, in pertinent part:

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

...

- (b) Gross negligence.

- (c) Repeated negligent acts. To be repeated, there must be two or more

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.

(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.

...

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

COST RECOVERY

8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to 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, with failure of the licensee to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

FIRST CAUSE FOR DISCIPLINE

(Gross Negligence)

9. Respondent has subjected her Physician's and Surgeon's Certificate No. A 84284 to disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (b), of the Code, in that she was grossly negligent in her care and treatment of Patient A,¹ as more particularly alleged hereinafter:

///

¹ To protect the privacy of the patient involved, the patient's name has not been included in this pleading. Respondent is aware of the identity of the patient referred to herein.

1 10. On or about November 6, 2019, Patient A, a then twenty-four-year-old female, was
2 booked into a criminal detention facility. During her initial intake at the facility, Patient A
3 admitted to regular use of heroin, alcohol, and Xanax,² with her last use being approximately two
4 hours prior to booking. Patient A identified her prior withdrawal symptoms to include tremors or
5 shakes, sweating, headache, and nausea or vomiting, but denied any prior seizure activity. An on-
6 site pregnancy test revealed positive results. Patient A was determined to be fit to continue the
7 booking process and a standard nursing protocol was ordered, which consisted of a daily prenatal
8 vitamin and ondansetron³ 4 mg twice daily for five days. Patient A was advised to drink fluids as
9 tolerated and to notify staff if her condition worsens. Patient A was not placed on a
10 polysubstance withdrawal protocol.

11 11. Between on or about November 6, 2019, and on or about November 10, 2019, while
12 housed in mainline housing, Patient A was witnessed by other inmates and staff to be
13 experiencing repeated intractable emesis, at times self-induced. Patient A was encouraged to
14 continue to drink fluids as tolerated.

15 12. On or about November 10, 2019, at approximately 10:18 a.m., Patient A was seen by
16 C.G., M.D. (Dr. C.G.) for the first time. Patient A complained of intractable vomiting, reported
17 that she was approximately five weeks pregnant with a desire for termination, and was
18 withdrawing from heroin and alcohol. Dr. C.G. obtained Patient A's blood pressure, temperature,
19 and pulse, but otherwise did not conduct a physical examination at that time or anytime thereafter.
20 Dr. C.G. noted Patient A was orthostatic,⁴ but alert and conversant. Dr. C.G. diagnosed Patient A
21 with intrauterine pregnancy with vomiting and mild dehydration. Dr. C.G. ordered Patient A to
22 be transferred to the Medical Observation Unit (MOB) for observation and oral hydration,

23
24 ² Xanax (brand name for alprazolam) is a Schedule IV controlled substance pursuant to
25 Health and Safety Code section 11057, subdivision (d), and a dangerous drug pursuant to section
4022 of the Code. It is a benzodiazepine medication used to treat anxiety and panic disorder.

26 ³ Ondansetron (brand name Zofran) is a medication used to prevent nausea and vomiting.
27 It is a dangerous drug pursuant to section 4022 of the Code.

28 ⁴ Orthostatic is a form of low blood pressure that happens when standing up from sitting
or lying down.

1 prescribed Zofran 8 mg three times daily, and referred Patient A to Planned Parenthood for
2 termination.

3 13. On or about November 10, 2019, at approximately 11:21 a.m., Dr. C.G. noted that
4 Patient A had not yet received treatment for withdrawal since her admission to the detention
5 facility four days earlier, and ordered Vistaril⁵ 50 mg twice daily.

6 14. On or about November 10, 2019, Patient A was admitted to the MOB and was housed
7 with multiple other inmates. Throughout the day, Patient A was witnessed by other inmates and
8 staff to be experiencing repeated intractable emesis, at times self-induced. At some point that
9 evening, Patient A was transferred to an isolation unit within the MOB.

10 15. On or about November 11, 2019, at approximately 8:40 a.m., Patient A was seen by
11 L.R., R.N. (Nurse L.R.). Patient A complained of repeated fainting and vomiting and was
12 advised to refrain from self-induced vomiting.

13 16. On or about November 11, 2019, at approximately 9:40 a.m., Patient A was seen by
14 Respondent for the first time. Respondent noted Patient A had been admitted to the MOB for
15 "fainting spells," but understood medical staff had a high suspicion of Patient A staging her
16 "fainting spells" for second gain purposes. Respondent incorrectly noted in Patient A's chart that
17 she had finished treatment for alcohol and heroin withdrawal. Patient A complained of vomiting
18 all of her food and drinks and requested IV hydration. Respondent did not obtain Patient A's
19 vital signs and did not perform and/or document a physical examination at that time. Respondent
20 instructed Patient A to rest, to ingest only small amounts of food and drink at a time, and to
21 refrain from self-induced vomiting. At the conclusion of the visit, Respondent ordered Patient A
22 to be on a full liquid diet for three days and to be discharged that day from the MOB back to
23 mainline housing. Respondent did not at that time, or any time thereafter, refer Patient A to the
24 emergency department for treatment of her active substance use withdrawal during pregnancy,

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27 ⁵ Vistaril (brand name for hydroxyzine pamoate) is an antihistamine with anticholinergic
28 (drying) and sedative properties used as a sedative to treat anxiety and tension. It is a dangerous
drug pursuant to section 4022 of the Code.

1 did not order a stat comprehensive blood panel, complete blood count, urinalysis, or
2 electrocardiogram, and did not order IV fluids.

3 17. On or about November 11, 2019, at approximately 1:00 p.m., Patient A was being
4 transported from the MOB back to mainline housing. While seated in a wheelchair outside her
5 isolation cell, Patient A's body suddenly stiffened with her head resting on the back of the chair
6 and her legs dangling on the floor. Patient A's eyes were open and her pupils were slightly
7 dilated but reactive to light. Patient A was not verbally responsive and was not following
8 commands. Patient A was placed back into her cell onto a mattress on the floor, given oxygen,
9 and an urgent call for medical personnel was initiated.

10 18. On or about November 11, 2019, at approximately 1:03 p.m., Dr. C.G. responded to
11 Patient A's isolation cell. Upon her arrival, Dr. C.G. spoke with nursing staff and ordered Patient
12 A be given Ativan⁶ 1 mg by mouth.

13 19. On or about November 11, 2019, at approximately 1:06 p.m., Respondent responded
14 to Patient A's isolation cell, spoke with nursing staff and Dr. C.G., and then assumed the care of
15 Patient A.⁷ Respondent performed a physical examination of Patient A and noted her hands and
16 feet were very cold to the touch but the remainder of her body felt warm. Respondent further
17 noted Patient A to be awake and alert, had no visible tongue bite, supple neck, and no urinary
18 incontinence. Patient A's initial oxygen saturation was measured to be 87% and a subsequent
19 reading was unable to be obtained despite Respondent's efforts. Respondent further noted Patient
20 A had "normal" vital signs, but did not document any vital signs in the patient's chart.
21 Respondent's assessment was that Patient A had not experienced a "true seizure," but she was
22 unable to exclude a medical cause for the patient's weakness and fainting spells. Respondent did
23 not perform a complete physical or neurological examination of Patient A, did not refer Patient A
24 to the emergency department, and did not order a stat comprehensive blood panel, complete blood

25 ⁶ Ativan (brand name for lorazepam) is a Schedule IV controlled substance pursuant to
26 Health and Safety Code section 11057, subdivision (d), and a dangerous drug pursuant to section
4022 of the Code. It is a benzodiazepine medication used to treat anxiety.

27 ⁷ Shortly after Respondent assumed the care of Patient A, Dr. C.G. left the area and never
28 returned.

1 count, urinalysis, electrocardiogram, or IV fluids. At the conclusion of the visit, Respondent
2 ordered Patient A to remain in the MOB for observation,⁸ with a plan to recheck in the morning
3 and discharge her back to mainline housing at that time.

4 20. On or about November 11, 2019, at approximately 3:15 p.m., staff witnessed Patient
5 A sitting backwards on the toilet when her body stiffened with her head resting on the floor and
6 her feet in the air. A deputy and Nurse L.R., responded to Patient A's cell and placed Patient A
7 back onto her mattress on the floor. Shortly thereafter, Patient A came out of her stiffness and
8 began responding to questions. Nurse L.R. called the medical clinic and relayed to R.I., R.N.
9 (Nurse R.I.), a request to have Respondent return to the MOB to evaluate Patient A. Nurse R.I.
10 relayed the message to Respondent. Sometime thereafter, Respondent watched Patient A in her
11 isolation cell for a few moments through a video monitor, but did not at that time, or anytime
12 thereafter, return to the MOB to evaluate Patient A.

13 21. On or about November 11, 2019, at approximately 8:06 p.m., Patient A was found
14 non-responsive in her cell and was subsequently pronounced dead as a result of complications of
15 polysubstance abuse with early intrauterine pregnancy.

16 22. Respondent committed gross negligence in her care and treatment of Patient A, which
17 included, but was not limited to, the following:

- 18 A. Failing to appropriately medically manage a pregnant patient in active
19 withdrawal on or about November 11, 2019, at approximately 9:40 a.m.;
- 20 B. Failing to perform an appropriate physical exam, work-up, and plan of
21 treatment for a patient with an undiagnosed acute medical condition on or
22 about November 11, 2019, at approximately 1:00 p.m.; and
- 23 C. Failing to perform an appropriate physical exam, work-up, and plan of
24 treatment for a patient with an undiagnosed acute medical condition on or
25 about November 11, 2019, at approximately 3:15 p.m.

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27 _____
28 ⁸ Respondent did not issue and/or document more specific orders regarding how frequent
Patient A should be "observed" or what that observation should entail.

1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Repeated Negligent Acts)**

3 23. Respondent has further subjected her Physician's and Surgeon's Certificate No.
4 A 84284 to disciplinary action under sections 2227 and 2234, as defined by section 2234,
5 subdivision (c), of the Code, in that she committed repeated negligent acts in her care and
6 treatment of Patient A, as more particularly alleged in paragraphs 9 through 22(C), above, which
7 are hereby incorporated by reference and realleged as if fully set forth herein.

8 **THIRD CAUSE FOR DISCIPLINE**

9 **(Failure to Maintain Adequate and Accurate Records)**

10 24. Respondent has further subjected her Physician's and Surgeon's Certificate No.
11 A 84284 to disciplinary action under sections 2227 and 2234, as defined by section 2266, of the
12 Code, in that Respondent failed to maintain adequate and accurate records regarding her care and
13 treatment of Patient A, as more particularly alleged in paragraphs 9 through 21, above, which are
14 hereby incorporated by reference and realleged as if fully set forth herein.

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PRAYER

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

1. Revoking or suspending Physician's and Surgeon's Certificate No. A 84284, issued to Respondent Friederike Carla Von Lintig, M.D.;
2. Revoking, suspending or denying approval of Respondent Friederike Carla Von Lintig, M.D.'s authority to supervise physician assistants and advanced practice nurses;
3. Ordering Respondent Friederike Carla Von Lintig, 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; and
4. Taking such other and further action as deemed necessary and proper.

DATED: OCT 03 2023


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

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