

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

In the Matter of the Accusation Against:

Adam Robert Klang, M.D.

**Physician's & Surgeon's
Certificate No. A 66296**

Respondent.

Case No. 800-2021-080348

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 January 17, 2025.

IT IS SO ORDERED: December 18, 2024.

MEDICAL BOARD OF CALIFORNIA

Michelle A. Bholat, MD

**Michelle Anne Bholat, Chair
Panel A**

1 ROB BONTA
Attorney General of California
2 EDWARD KIM
Supervising Deputy Attorney General
3 MELISSA M. MARQUEZ
Deputy Attorney General
4 State Bar No. 326096
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
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6 Facsimile: (916) 731-2117
Attorneys for Complainant
7

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

11 In the Matter of the Accusation Against:

Case No. 800-2021-080348

12 **ADAM ROBERT KLANG, M.D.**
13 **15001 Vista Grande Dr. -9746**
Bakersfield, CA 93306

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

14 **Physician's and Surgeon's Certificate**
15 **No. A 66296**

16 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 Melissa M. Marquez,
24 Deputy Attorney General.

25 2. Respondent Adam Robert Klang, M.D. (Respondent) is represented in this
26 proceeding by attorney Kevin E. Thelen, Esq., whose address is: 5001 E. Commercenter Drive,
27 Suite 300, P.O. Box 12092, Bakersfield, California 93389-2092.

28 3. On or about August 14, 1998, the Board issued Physician's and Surgeon's Certificate

1 No. A 66296 to Adam Robert Kiang, M.D. (Respondent). The Physician's and Surgeon's
2 Certificate was in full force and effect at all times relevant to the charges brought in Accusation
3 No. 800-2021-080348, and will expire on February 28, 2026, unless renewed.

4 **JURISDICTION**

5 4. On July 18, 2024, Accusation No. 800-2021-080348 was filed before the Board, and
6 is currently pending against Respondent. The Accusation and all other statutorily required
7 documents were properly served on Respondent. Respondent timely filed his Notice of Defense
8 contesting the Accusation. A copy of Accusation No. 800-2021-080348 is attached as Exhibit A
9 and incorporated herein 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. 800-2021-080348. Respondent has also carefully read,
13 fully discussed with his counsel, and understands the effects of this Stipulated Settlement and
14 Disciplinary 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 and agrees that the charges and allegations in Accusation
25 No. 800-2021-080348, if proven at hearing, constitute cause for imposing discipline upon his
26 Physician's and Surgeon's Certificate. Respondent does not contest that, at an administrative
27 hearing, Complainant could establish a prima facie case with respect to the charges and
28 allegations in Accusation No. 800-2021-080348, and that he thereby subjected his Physicians'

1 and Surgeon's Certificate, No. A 66296 to disciplinary action.

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

5 **CONTINGENCY**

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

16 11. Respondent agrees that if an accusation is filed against him before the Board, all of
17 the charges and allegations contained in Accusation No. 800-2021-080348 shall be deemed true,
18 correct and fully admitted by Respondent for purposes of any such proceeding or any other
19 licensing proceeding involving Respondent in the State of California

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

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

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

1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 66296 issued
3 to Respondent ADAM ROBERT KLANG, M.D. is publicly reprimanded pursuant to California
4 Business and Professions Code 2227, subdivision (a)(4), with the following terms and conditions:

5 1. **PUBLIC REPRIMAND.**

6 The Public Reprimand, which is issued in connection with Respondent's care and treatment
7 of Patient, as set forth in Accusation No. 800-2021-080348, is as follows:

8 During the period from 2018 through 2021, Respondent failed to check CURES and
9 maintain adequate and accurate medical records, as required by Business and Professions
10 Code section 2266, for Patient.

11 2. **EDUCATION COURSE.** Within 60 calendar days of the effective date of this
12 Decision, Respondent shall submit to the Board or its designee for its prior approval educational
13 program(s) or course(s) which shall not be less than 40 hours. The educational program(s) or
14 course(s) shall be aimed at correcting any areas of deficient practice or knowledge and shall be
15 Category I certified. The educational program(s) or course(s) shall be at Respondent's expense
16 and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of
17 licensure. Following the completion of each course, the Board or its designee may administer an
18 examination to test Respondent's knowledge of the course. Respondent shall submit a
19 certification of successful completion to the Board or its designee not later than 15 calendar days
20 after successfully completing the educational program(s) or course(s). Respondent shall
21 successfully complete the educational program(s) or course(s) hereunder within one (1) year of
22 the effective date of this Decision.

23 3. **PRESCRIBING PRACTICES COURSE.** Within 60 calendar days of the effective
24 date of this Decision, Respondent shall enroll in a course in prescribing practices approved in
25 advance by the Board or its designee. Respondent shall provide the approved course provider
26 with any information and documents that the approved course provider may deem pertinent.
27 Respondent shall participate in and successfully complete the classroom component of the course
28 not later than six (6) months after Respondent's initial enrollment. Respondent shall successfully

1 complete any other component of the course within one (1) year of enrollment. The prescribing
2 practices course shall be at Respondent's expense and shall be in addition to the Continuing
3 Medical Education (CME) requirements for renewal of licensure.

4 A prescribing practices course taken after the acts that gave rise to the charges in the
5 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board
6 or its designee, be accepted towards the fulfillment of this condition if the course would have
7 been approved by the Board or its designee had the course been taken after the effective date of
8 this Decision.

9 Respondent shall submit a certification of successful completion to the Board or its
10 designee not later than 15 calendar days after successfully completing the course, or not later than
11 15 calendar days after the effective date of the Decision, whichever is later.

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

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

26 Respondent shall submit a certification of successful completion to the Board or its
27 designee not later than 15 calendar days after successfully completing the course, or not later than
28 15 calendar days after the effective date of the Decision, whichever is later.

5. **COST RECOVERY.** Respondent is hereby ordered to reimburse the Board its costs of investigation and enforcement in the amount of \$36,614.61, payable over the course of three years. Costs shall be payable to the Medical Board of California.

Payment must be made in full within 30 calendar days of the effective date of the Order, or by a payment plan approved by the Board. Any and all requests for a payment plan shall be submitted in writing by Respondent to the Board. Failure to comply with the payment plan shall be considered a violation of probation.

The filing of bankruptcy by Respondent shall not relieve Respondent of the responsibility to repay investigation and enforcement costs, including expert review costs (if applicable).

6. VIOLATIONS. Failure to fully comply with any term or condition of this Disciplinary Order is unprofessional conduct in violation of Business and Professions Code section 2234. If Respondent violates this Disciplinary Order in any respect, the Board, after giving Respondent notice and the opportunity to be heard, may discipline Respondent's license further for unprofessional conduct.

ACCEPTANCE

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

DATED: 11/5/2024

ADAM ROBERT KLANG, M.D.
Respondent

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

1
2 DATED: Nov. 6, 2024


3 KEVIN E. THELEN
4 *Attorney for Respondent*

5 **ENDORSEMENT**

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

8
9 DATED: 11/12/2024

Respectfully submitted,

10 ROB BONTA
11 Attorney General of California
12 EDWARD KIM
13 Supervising Deputy Attorney General

14 Melissa M.

15 Marquez

16 MELISSA M. MARQUEZ
17 Deputy Attorney General
18 *Attorneys for Complainant*

Digitally signed by Melissa M.
Marquez
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Exhibit A

Accusation No. 800-2021-080348

1 ROB BONTA
Attorney General of California
2 JUDITH T. ALVARADO
Supervising Deputy Attorney General
3 State Bar No. 155307
MELISSA M. MARQUEZ
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5 300 South Spring Street, Suite 1702
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7 Attorneys for Complainant

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9 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
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10 **STATE OF CALIFORNIA**

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12 In the Matter of the Accusation Against:

Case No. 800-2021-080348

13 **ADAM ROBERT KLANG, M.D.**
14 **15001 Vista Grande Dr.**
Bakersfield, CA 93306

A C C U S A T I O N

15 **Physician's and Surgeon's Certificate**
16 **No. A 66296,**

17 Respondent.

18
19 **PARTIES**

20 1. Rejl 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 August 14, 1998, the Medical Board issued Physician's and Surgeon's Certificate
24 Number A 66296 to Adam Robert Klang, M.D. (Respondent). The Physician's and Surgeon's
25 Certificate was in full force and effect at all times relevant to the charges brought herein and will
26 expire on February 28, 2026, unless renewed.

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4. Section 2004 of the Code states:

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

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

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

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

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

(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:

(2) Have his or her right to practice suspended for a period not to exceed one year 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.

1 (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.

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

6 6. Section 4022 of the Code states:

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

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

10 (b) Any device that bears the statement: "Caution: federal law restricts this
11 device to sale by or on the order of a _____," "Rx only," or words of similar import,
the blank to be filled in with the designation of the practitioner licensed to use or
12 order use of the device.

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

14 **STATUTORY PROVISIONS**

15 7. Section 2234 of the Code states:

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

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

20 (b) Gross negligence.

21 (c) Repeated negligent acts. To be repeated, there must be two or more
22 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
23 repeated negligent acts.

24 (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.

25 (2) When the standard of care requires a change in the diagnosis, act, or
26 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
27 licensee's conduct departs from the applicable standard of care, each departure
constitutes a separate and distinct breach of the standard of care.

28 (d) Incompetence.

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

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

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

8 8. Section 2266 of the Code states:

9 The failure of a physician and surgeon to maintain adequate and accurate
10 records relating to the provision of services to their patients constitutes unprofessional
11 conduct.

12 COST RECOVERY

13 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
14 administrative law judge to direct a licensee found to have committed a violation or violations of
15 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
16 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
17 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
18 included in a stipulated settlement.

19 FIRST CAUSE FOR DISCIPLINE

20 (Unprofessional Conduct-Repeated Negligent Acts)

21 10. Respondent is subject to disciplinary action under sections 2234 and 2234;
22 subdivision (c) of the Code in that Respondent engaged in unprofessional conduct and committed
23 negligent acts in his care of Patient. The circumstances are as follows:

24 11. Respondent is board-certified in internal medicine. Patient¹ is an elderly woman with
25 multiple medical problems, including a long history of anxiety for which she was prescribed
26 benzodiazepines. Patient is Respondent's mother-in-law. At various times over the years,
27 Respondent assumed at least some responsibility for providing medical care to Patient. During
28 the period addressed in this Accusation, Patient resided in assisted living or skilled nursing
facilities.

¹ The patient is referred to as Patient to preserve confidentiality.

1 12. Between 2018 and 2021, Respondent prescribed controlled substances to Patient on a
2 number of occasions. In 2018, Patient filled multiple prescriptions issued by Respondent for
3 alprazolam, a benzodiazepine-controlled substance used to control anxiety (it is a dangerous drug
4 pursuant to section 4022 of the Code), including on or about the following dates: January 5, 2018,
5 April 11, 2018, September 12, 2018, October 22, 2018, November 26, 2018, and December 24,
6 2018. In 2019, Patient filled prescriptions issued by Respondent for alprazolam, including on or
7 about the following dates: January 21, 2019, March 18, 2019, July 4, 2019, and September 6,
8 2019, and temazepam (also a benzodiazepine and controlled substance, generally used to treat
9 insomnia, and a dangerous drug pursuant to section 4022 of the Code), including on or about the
10 following date: June 20, 2019. On one occasion in 2019, Patient filled a prescription issued by
11 Respondent for hydrocodone bitartrate and acetaminophen, commonly called Norco. (Norco is
12 an opiate pain reliever and a controlled substance. It is a dangerous drug pursuant to section 4022
13 of the Code). In 2020, Patient filled multiple prescriptions issued by Respondent for alprazolam,
14 including on or about the following dates: March 9, 2020, June 8, 2020, September 6, 2020, and
15 December 7, 2020, and in 2021, Patient filled two prescriptions issued by Respondent for
16 alprazolam, including on or about the following dates: March 7, 2021, and June 5, 2021.

17 13. During this same time period, other physicians were prescribing the same medications
18 for Patient. Most notably, one of Patient's sons, a close friend and business associate of
19 Respondent, issued Patient numerous prescriptions for alprazolam, often resulting in the
20 dispensing of alprazolam in amounts far exceeding the intended dosage. For example: Patient
21 filled a prescription issued by Respondent for alprazolam on or about each of the following dates:
22 October 22, 2018 (15 .25 mg pills) and December 24, 2018 (15 .25 mg pills). On those same
23 dates, Patient also filled prescriptions issued by Patient's son for alprazolam pills. On or about
24 September 11, 2018, Patient filled a prescription issued by Patient's son for 30 alprazolam pills
25 (.5 mg), and the next day, September 12, 2018, Patient filled a prescription issued by Respondent
26 for 15 alprazolam pills (.25 mg). On January 8, 2019, Patient filled a prescription issued by
27 Patient's son for 30 alprazolam pills (.5 mg), and approximately two weeks later, on January 21,
28 2019, Patient filled a prescription issued by Respondent for 15 alprazolam pills (0.25 mg). On or

1 about March 18, 2019, Patient filled two prescriptions issued by Respondent, including one for
2 alprazolam, for 28 tablets (.25 mg), and the other for 55 tablets (.50 mg).

3 14. During his interview with the Board's Investigator, Respondent tried to downplay his
4 role as a physician to his mother-in-law. He acknowledged that he had at times treated Patient,
5 but stated that all of the treatment and prescriptions he provided to Patient were done in
6 consultation with Patient's primary care physician. He was simply trying to be "helpful" in
7 supplementing care for his mother-in-law. However, Patient's primary care physician denied to
8 the Board's investigator that he consulted with Respondent on this subject, or that Respondent
9 was prescribing to Patient on his behalf.

10 15. Respondent conceded that he never checked the CURES² system at any time during
11 his treatment of and prescribing to Patient, because Patient was his mother-in-law and he knew
12 "exactly what" she was taking. Respondent was unable to explain why he and his brother-in-law
13 had simultaneously prescribed the same medications for Patient, albeit he also maintained that the
14 two of them were in constant communication regarding Patient, and stated that he was unaware
15 that another physician was prescribing for her at the same time he was. Respondent attributed
16 any errors to Patient's assisted living facility. Respondent was unable to explain why he issued
17 two alprazolam prescriptions on a single day, in different strengths, significantly in excess of
18 Patient's usual dosage.

19 16. Respondent did not maintain a medical record for his treatment of and prescribing to
20 Patient. Respondent's certified response to a request for his records of Patient's treatment was,
21 "A thorough search of our files carried out under my direction and control revealed that this
22 facility or business does not have the records..." The only documentation of Respondent's
23 treatment of and prescribing to Patient was produced by Patient's care facility, which produced a
24 binder containing some "informal" and partially illegible notes which for the most part simply
25 note prescription refills.

26
27 ² The Controlled Substance Utilization Review and Evaluation System (CURES) is a
28 program operated by the California Department of Justice to assist health care practitioners in
their efforts to ensure appropriate prescribing of controlled substances, and law enforcement and
regulatory agencies in their efforts to control diversion and abuse of controlled substances.

17. Respondent's treatment of Patient as set forth above includes the following acts and/or omissions which constitute unprofessional conduct and departures from the standard of practice:

A. Respondent undertook to provide medical treatment and prescribed controlled substances to Patient, his mother-in-law, without coordinating his care with Patient's primary care giver or other medical providers;

B. Respondent issued multiple prescriptions for controlled substances, over an extended period of time, without a documented medical indication, and without coordinating his prescribing with others who were simultaneously prescribing for Patient;

C. Respondent prescribed controlled substances to Patient between 2018 and 2021, without ever consulting CURES, or taking any steps to determine what other practitioners were prescribing.

SECOND CAUSE FOR DISCIPLINE

(Failure to Maintain Adequate and Accurate Medical Records)

18. Respondent is subject to disciplinary action under section 2266 of the Code in that Respondent failed to maintain adequate records of his care and treatment of Patient. The circumstances are as follows:

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

20. Respondent treated Patient and prescribed controlled substances over a period of several years, without maintaining a medical record of that treatment. The cursory notes contained in the "binder" produced by Patient's care facility lack fundamental information such as an assessment of Patient's condition, the reason Respondent was prescribing for the patient, a medical indication or rationale for prescribing, an evaluation or a treatment plan, or why the dosages prescribed at times varied.

21. Respondent's acts and/or omissions as set forth in paragraphs 18 through 20, inclusive, above, whether proven individually, jointly, or in any combination thereof, constitute

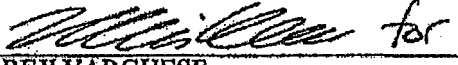
1 the failure to maintain adequate and accurate medical records pursuant to section 2266 of the
2 Code. Therefore, cause for discipline exists.

3 PRAYER

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

- 6 1. Revoking or suspending Physician's and Surgeon's Certificate Number A 66296,
7 issued to Respondent Adam Robert Klang, M.D.;
- 8 2. Revoking, suspending or denying approval of Respondent Adam Robert Klang,
9 M.D.'s authority to supervise physician assistants and advanced practice nurses;
- 10 3. Ordering Respondent Adam Robert Klang, M.D., to pay the Board the costs of the
11 investigation and enforcement of this case, and if placed on probation, the costs of probation
12 monitoring; and,
- 13 4. Taking such other and further action as deemed necessary and proper.

14
15 DATED: JUL 18 2024


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

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