

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

In the Matter of the Accusation Against:

Jeffrey Dean Coe, M.D.

**Physician's & Surgeon's
Certificate No. G 43782**

Respondent.

Case No. 800-2021-082395

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 February 12, 2025.

IT IS SO ORDERED: January 13, 2025.

MEDICAL BOARD OF CALIFORNIA

Michelle A. Bholat, MD

**Michelle A. Bholat, M.D., Chair
Panel A**

1 ROB BONTA
Attorney General of California
2 MACHAELA M. MINGARDI
Supervising Deputy Attorney General
3 D. MARK JACKSON
Deputy Attorney General
4 State Bar No. 218502
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
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6 E-mail: Mark.Jackson@doj.ca.gov
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:

13 **JEFFREY DEAN COE, M.D.**

14 **340 Dardanelli Lane, Suite 10**
15 **Los Gatos, CA 95032-1418**

16 **Physician's and Surgeon's Certificate No. G**
17 **43782**

18 Respondent.

Case No. 800-2021-082395

OAH No. 2024020158

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER FOR PUBLIC
REPRIMAND

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 D. Mark Jackson, Deputy
25 Attorney General.

26 2. Respondent Jeffrey Dean Coe, M.D., (Respondent) is represented in this proceeding
27 by attorney Shannon V. Baker, whose address is: 765 University Avenue, Sacramento, CA
28 95825.

3. On or about November 17, 1980, the Board issued Physician's and Surgeon's Certificate No. G 43782 to Jeffrey Dean Coe, M.D. (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. 800-2021-082395, and will expire on March 31, 2026, unless renewed.

JURISDICTION

4. Accusation No. 800-2021-082395 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 December 8, 2022. Respondent timely filed his Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 800-2021-082395 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 Accusation No. 800-2021-082395. 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 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.

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1 **CULPABILITY**

2 9. Respondent understands and agrees that the charges and allegations in Accusation
3 No. 800-2021-082395, if proven at a hearing, constitute cause for imposing discipline upon his
4 Physician's and Surgeon's Certificate.

5 10. Respondent agrees that, at a hearing, Complainant could establish a prima facie case
6 or factual basis for the charges in the Accusation, and that Respondent hereby gives up his right
7 to contest those charges.

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

11 **CONTINGENCY**

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

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

25 14. The parties understand and agree that Portable Document Format (PDF) and facsimile
26 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
27 signatures thereto, shall have the same force and effect as the originals.
28

15. 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 the Respondent, JEFFREY DEAN COE, M.D., Physician's and Surgeon's Certificate No. G 43782, shall be and hereby is publically reprimanded pursuant to California Business and Professions Code, section 2227, subdivision (a)(4). This public reprimand is issued in connection with allegations of inappropriate behavior with a coworker in November 2019, as set forth in Accusation No. 800-2021-082395.

1. PROFESSIONALISM PROGRAM (ETHICS COURSE). Within 60 calendar days of the effective date of this Decision, Respondent shall enroll in a professionalism program, that meets the requirements of Title 16, California Code of Regulations (CCR) section 1358.1. Respondent shall participate in and successfully complete that program. Respondent shall provide any information and documents that the program may deem pertinent. Respondent shall successfully complete the classroom component of the program not later than six (6) months after Respondent's initial enrollment, and the longitudinal component of the program not later than the time specified by the program, but no later than one (1) year after attending the classroom component. The professionalism program shall be at Respondent's expense and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

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

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

2. PROFESSIONAL BOUNDARIES PROGRAM. Within 60 calendar days from the

1 effective date of this Decision, Respondent shall enroll in a professional boundaries program
2 approved in advance by the Board or its designee. Respondent, at the program's discretion, shall
3 undergo and complete the program's assessment of Respondent's competency, mental health
4 and/or neuropsychological performance, and at minimum, a 24 hour program of interactive
5 education and training in the area of boundaries, which takes into account data obtained from the
6 assessment and from the Decision(s), Accusation(s) and any other information that the Board or
7 its designee deems relevant. The program shall evaluate Respondent at the end of the training and
8 the program shall provide any data from the assessment and training as well as the results of the
9 evaluation to the Board or its designee.

10 Failure to complete the entire program not later than six (6) months after Respondent's
11 initial enrollment shall constitute a violation of probation unless the Board or its designee agrees
12 in writing to a later time for completion. Based on Respondent's performance in and evaluations
13 from the assessment, education, and training, the program shall advise the Board or its designee
14 of its recommendation(s) for additional education, training, psychotherapy and other measures
15 necessary to ensure that Respondent can practice medicine safely. Respondent shall comply with
16 program recommendations. At the completion of the program, Respondent shall submit to a final
17 evaluation. The program shall provide the results of the evaluation to the Board or its designee.
18 The professional boundaries program shall be at Respondent's expense and shall be in addition to
19 the Continuing Medical Education (CME) requirements for renewal of licensure.

20 The program has the authority to determine whether or not Respondent successfully
21 completed the program.

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

27 3. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby
28 ordered to reimburse the Board its costs of investigation and enforcement, including, but not

1 limited to, expert review, amended accusations, legal reviews, investigation(s), and subpoena
2 enforcement, as applicable, in the amount of \$32,226 (thirty-two thousand two hundred twenty-
3 six dollars). Costs shall be payable to the Medical Board of California. Failure to pay such costs
4 shall be considered a violation of this order.

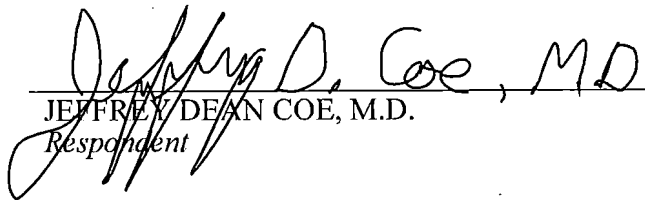
5 Payment must be made in full within 30 calendar days of the effective date of the Order, or
6 by a payment plan approved by the Medical Board of California. Any and all requests for a
7 payment plan shall be submitted in writing by respondent to the Board. Failure to comply with the
8 payment plan shall be considered a violation of this order.

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

11 **ACCEPTANCE**

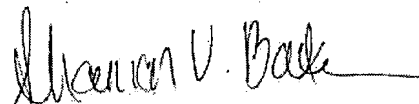
12 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
13 discussed it with my attorney, Shannon V. Baker. I understand the stipulation and the effect it will
14 have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and
15 Disciplinary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

17
18 DATED: September 16, 2024


JEFFREY DEAN COE, M.D.
Respondent

21 I have read and fully discussed with Respondent Jeffrey Dean Coe, M.D. the terms and
22 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
23 I approve its form and content.

24
25 DATED: September 17, 2024


SHANNON V. BAKER
Attorney for Respondent

ENDORSEMENT

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

DATED: 9/18/2024

Respectfully submitted,

ROB BONTA
Attorney General of California
MACHAELA M. MINGARDI
Supervising Deputy Attorney General


D. MARK JACKSON
Deputy Attorney General
Attorneys for Complainant

LA2022603953

Exhibit A

Accusation No. 800-2021-082395

1 ROB BONTA
Attorney General of California
2 EDWARD KIM
Supervising Deputy Attorney General
3 State Bar No. 195729
300 So. Spring Street, Suite 1702
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Attorneys for Complainant
6

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. 800-2021-082395

13 **JEFFREY DEAN COE, M.D.**
340 Dardanelli Lane, Suite 10
Los Gatos, CA 95032-1418

A C C U S A T I O N

14 **Physician's and Surgeon's**
15 **Certificate No. G 43782,**

Respondent.

16
17 **PARTIES**

18 1. William Prasifka (Complainant) brings this Accusation solely in his official capacity
19 as the Executive Director of the Medical Board of California, Department of Consumer Affairs
20 (Board).

21 2. On or about November 17, 1980, the Board issued Physician's and Surgeon's
22 Certificate Number G 43782 to Jeffrey Dean Coe, M.D. (Respondent). The Physician's and
23 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
24 herein and will expire on March 31, 2024, unless renewed.

25 **JURISDICTION**

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

1 4. Section 2220 of the Code states:

2 Except as otherwise provided by law, the board may take action against all
3 persons guilty of violating this chapter. The board shall enforce and administer this
4 article as to physician and surgeon certificate holders, including those who hold
5 certificates that do not permit them to practice medicine, such as, but not limited to,
6 retired, inactive, or disabled status certificate holders, and the board shall have all the
7 powers granted in this chapter for these purposes including, but not limited to:

8 (a) Investigating complaints from the public, from other licensees, from health
9 care facilities, or from the board that a physician and surgeon may be guilty of
10 unprofessional conduct. The board shall investigate the circumstances underlying a
11 report received pursuant to Section 805 or 805.01 within 30 days to determine if an
12 interim suspension order or temporary restraining order should be issued. The board
13 shall otherwise provide timely disposition of the reports received pursuant to Section
14 805 and Section 805.01.

15 (b) Investigating the circumstances of practice of any physician and surgeon
16 where there have been any judgments, settlements, or arbitration awards requiring the
17 physician and surgeon or his or her professional liability insurer to pay an amount in
18 damages in excess of a cumulative total of thirty thousand dollars (\$30,000) with
19 respect to any claim that injury or damage was proximately caused by the physician's
20 and surgeon's error, negligence, or omission.

21 (c) Investigating the nature and causes of injuries from cases which shall be
22 reported of a high number of judgments, settlements, or arbitration awards against a
23 physician and surgeon.

24 5. Section 2227 of the Code states:

25 (a) A licensee whose matter has been heard by an administrative law judge of
26 the Medical Quality Hearing Panel as designated in Section 11371 of the Government
27 Code, or whose default has been entered, and who is found guilty, or who has entered
28 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.

(b) Any matter heard pursuant to subdivision (a), except for warning letters,
medical review or advisory conferences, professional competency examinations,
continuing education activities, and cost reimbursement associated therewith that are
agreed to with the board and successfully completed by the licensee, or other matters

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.

STATUTORY PROVISIONS

6. Section 2234 of the Code, states:

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:

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

(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.

(d) Incompetence.

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

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

(g) The failure by a certificate holder, in the absence of good cause, to attend 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.

COST RECOVERY

7. Section 125.3 of the Code states:

(a) Except as otherwise provided by law, in any order issued in resolution of a disciplinary proceeding before any board within the department or before the Osteopathic Medical Board, upon request of the entity bringing the proceeding, the 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.

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

7 (d) The administrative law judge shall make a proposed finding of the amount
8 of reasonable costs of investigation and prosecution of the case when requested
9 pursuant to subdivision (a). The finding of the administrative law judge with regard
10 to costs shall not be reviewable by the board to increase the cost award. The board
11 may reduce or eliminate the cost award, or remand to the administrative law judge if
12 the proposed decision fails to make a finding on costs requested pursuant to
13 subdivision (a).

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

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

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

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

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

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

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

FIRST CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

8. Respondent Jeffrey Dean Coe, M.D. is subject to disciplinary action under sections
2227 and 2234 of the Code, in that he engaged in conduct which breached the rules or ethical
code of the medical profession or which was unbecoming a member in good standing of the
medical profession, and which demonstrates an unfitness to practice medicine, as more

1 particularly alleged hereinafter.

2 9. Respondent is an orthopedic surgeon. He practices in Northern California, including
3 San Jose, Los Gatos and Mountain View.

4 10. On or about November 25, 2019, Respondent performed a sacroiliac joint fusion
5 surgery on a patient at Dominican Hospital in Santa Cruz, where he had only previously worked
6 on a single occasion in or around May of 2019. He only went there to support his practice
7 partners. After surgery on that day, while the patient was in the Post-Anesthesia Care Unit
8 ("PACU"), Respondent encountered difficulty with the hospital's computer system – he could not
9 gain access to the electronic medical record at the hospital due to the expiration of his password.
10 He became frustrated and increasingly angry. He was observed to be yelling at the computer and
11 complaining loudly that his password was not working. In an attempt to resolve the issue, he
12 called the information technology ("IT") personnel, but allegedly, the IT personnel were in a
13 different country and he encountered connection issues. Respondent became increasingly
14 frustrated and angry. Other patients and nurses in the PACU observed that Respondent was
15 yelling and cursing on the phone, and at one point, slammed the phone down. At that time, Nurse
16 D-B noticed that one of her patients was waking up from surgery and appeared startled by
17 Respondent's loud voice and had an alarmed look on her face. Respondent continued yelling and
18 swearing loudly. In light of his disruptive behavior, Nurse D-B approached Respondent to ask
19 him to lower his voice.

20 11. However, when Nurse D-B approached Respondent, he grabbed her by the
21 neck/shoulder and began pulling her head closer to him until they were face to face. At the same
22 time, he dug his thumb into the left side of her neck and she felt immediate pain shooting down
23 her left arm. She said to him, "let go of me, you are hurting me!" Respondent then said to her,
24 "[w]ell you started this, you came up to me. This is your fault. And that's not your neck, it's your
25 trapezius muscle." He then pushed down even harder causing significant and debilitating nerve
26 pain. He was pushing the nurse's head toward his desktop and began telling her that his password
27 was not working. Nurse D-B told Respondent again that he was hurting her and that he should
28 release her. Finally, he let go of her.

1 12. The incident was reported to the police and the Santa Cruz County District
2 Attorney's Office filed criminal battery charges against him. After Respondent completed 30
3 hours of community service, the Superior Court dismissed the charges pursuant to Penal Code
4 section 1385.

5 13. The Dominican Hospital Medical Staff Bylaws and policies of Dominican Hospital
6 provide that "[u]nprofessional conduct has the potential to adversely affect the quality of care
7 delivered to patients and undermines our core values of respect for the dignity of all persons," and
8 that the medical staff there, "maintains a zero-tolerance policy towards behaviors that undermine
9 a culture of safety." In addition, Dominican Hospital's medical staff policy provides that
10 examples of prohibited conduct include, "[a]ny striking, pushing, or inappropriate touching of
11 Hospital Staff or others;" and "[f]orcefully throwing, hitting, pushing, or slamming objects in an
12 expression of anger or frustration;" and "[y]elling, screaming, or using an unduly loud voice
13 directed at patients, Hospital employees, other practitioners, or others."

14 14. In Issue 40, dated July 9, 2008, the Joint Commission¹ published an alert entitled,
15 "Behaviors that undermine a culture of safety," which stated that "all intimidating and disruptive
16 behaviors are unprofessional and should not be tolerated" because "[i]ntimidating and disruptive
17 behaviors can foster medical errors, (1,2,3) contribute to poor patient satisfaction and to
18 preventable adverse outcomes, (1,4,5) increase the cost of care, (4,5) and cause qualified
19 clinicians, administrators and managers to seek new positions in more professional
20 environments." Issue 40 further provides that:

21 "Intimidating and disruptive behaviors include overt actions such as verbal outbursts
22 and physical threats, as well as passive activities such as refusing to perform assigned tasks
23 or quietly exhibiting uncooperative attitudes during routine activities. Intimidating and
24 disruptive behaviors are often manifested by health care professionals in positions of
25 power. Such behaviors include reluctance or refusal to answer questions, return phone calls
26 or pages; condescending language or voice intonation; and impatience with questions. (2)
Overt and passive behaviors undermine team effectiveness and can compromise the safety
of patients. (7, 8, 11)."

27 ¹ The Joint Commission is a United States-based nonprofit tax-exempt 501(c) organization
28 that accredits more than 22,000 US health care organizations and programs. A majority of US
state governments recognize Joint Commission accreditation as a condition of licensure for the
receipt of Medicaid and Medicare reimbursements.

15. Respondent's actions on or about November 25, 2019 in the PACU at Dominican Hospital represent unprofessional conduct.

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 Number G 43782,
issued to Jeffrey Dean Coe, M.D.;

2. Revoking, suspending or denying approval of Jeffrey Dean Coe, M.D.'s authority to supervise physician assistants and advanced practice nurses;

3. Ordering Jeffrey Dean Coe, 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: DEC 08 2022

WILLIAM PRASIFKA
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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