

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

In the Matter of the Accusation  
Against:

Gray Reynolds Williams, D.P.M.

Doctor of Podiatric Medicine

Certificate No. E 4081

Case No.: 500-2021-001219

Respondent.

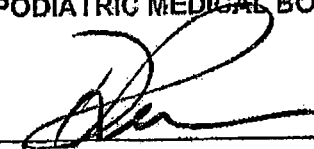
DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Podiatric Medicine Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on April 7, 2025

IT IS SO ORDERED: March 7, 2025

PODIATRIC MEDICAL BOARD OF CALIFORNIA



Daniel Lee, D.P.M., PhD  
President

1 ROB BONTA  
Attorney General of California  
2 JUDITH T. ALVARADO  
Supervising Deputy Attorney General  
3 PEGGIE BRADFORD TARWATER  
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7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

13 **GRAY REYNOLDS WILLIAMS, D.P.M.**  
14 **261 Regents Park Drive**  
15 **Vallejo, CA 94591**

16 **Doctor of Podiatric Medicine License No.**  
**DPM 4081,**

17 Respondent.

Case No. 500-2021-001219

OAH No. 2024030531

18  
19 **STIPULATED SETTLEMENT AND**  
20 **DISCIPLINARY ORDER**

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

23 **PARTIES**

24 1. Brian Naslund (Complainant) is the Executive Officer of the Podiatric Medical Board  
25 (Board). He brought this action solely in his official capacity and is represented in this matter by  
26 Rob Bonta, Attorney General of the State of California, by Peggie Bradford Tarwater, Deputy  
27 Attorney General.

28 2. Respondent Gray Reynolds Williams, D.P.M. (Respondent) is represented in this  
proceeding by attorney Ann H. Larson, whose address is as follows: 12677 Alcosta Boulevard,  
Suite 375, San Ramon, CA 94583-4202.

1           3.     On or about July 1, 1997, the Board issued Doctor of Podiatric Medicine License No.  
2 DPM 4081 to Respondent. The Doctor of Podiatric Medicine License was in full force and effect  
3 at all times relevant to the charges brought in Accusation No. 500-2021-001219, and will expire  
4 on October 31, 2024, unless renewed.

5                                   **JURISDICTION**

6           4.     Accusation No. 500-2021-001219 was filed before the Board and is currently pending  
7 against Respondent. The Accusation and all other statutorily required documents were properly  
8 served on Respondent on January 19, 2024. Respondent timely filed his Notice of Defense  
9 contesting the Accusation.

10          5.     A copy of Accusation No. 500-2021-001219 is attached as Exhibit A and  
11 incorporated by reference.

12                                   **ADVISEMENT AND WAIVERS**

13          6.     Respondent has carefully read, discussed with counsel, and fully understands the  
14 charges and allegations in Accusation No. 500-2021-001219. Respondent has also carefully read,  
15 fully discussed with counsel, and understands the effects of this Stipulated Settlement and  
16 Disciplinary Order.

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

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

25                                   **CULPABILITY**

26          9.     Respondent understands and agrees that the charges and allegations in Accusation  
27 No. 500-2021-001219, if proven at a hearing, constitute cause for imposing discipline upon his  
28 Doctor of Podiatric Medicine License.

10. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the charges in the Accusation, and Respondent hereby gives up his right to contest those charges.

11. Respondent agrees that his Doctor of Podiatric Medicine License is subject to discipline and he agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below. Respondent further agrees that if he fails to comply with the terms set forth in the Disciplinary Order, all of the charges and allegations contained in Accusation No. 500-2021-001219 shall be deemed true, correct, and fully admitted by Respondent for purposes of any further proceeding before the Board, and that his failure to complete the terms set forth in the Disciplinary Order shall constitute unprofessional conduct and grounds for further disciplinary order.

## CONTINGENCY

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

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

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Doctor of Podiatric Medicine License No. DPM 4081  
3 issued to Respondent is revoked. However, the revocation is stayed and Respondent is placed on  
4 probation for two years on the following terms and conditions:

5 1. **EDUCATION COURSE** Within 60 days of the effective date of this Decision, and  
6 on an annual basis thereafter, Respondent shall submit to the Board or its designee for its prior  
7 approval educational program(s) or course(s) which shall not be less than 40 hours per year, for  
8 each year of probation. The educational program(s) or course(s) shall be aimed at correcting any  
9 areas of deficient practice or knowledge in the following areas: record-keeping; patient  
10 communications; cancer detection and treatment record-keeping; patient communications; cancer  
11 detection and treatment; skin assessment; lesion diagnosis and management; and, dermatology.  
12 The educational program(s) or course(s) shall be Category I certified or Board approved. The  
13 educational program(s) or course(s) shall be at Respondent's expense and shall be in addition to  
14 the Continuing Medical Education (CME) requirements, which must be scientific in nature, for  
15 renewal of licensure. Following the completion of each course, the Board or its designee may  
16 administer an examination to test Respondent's knowledge of the course. Respondent shall  
17 provide proof of attendance for 65 hours of CME of which 40 hours were in satisfaction of this  
18 condition.

19 2. **NOTIFICATION** Prior to engaging in the practice of medicine, Respondent shall  
20 provide a true copy of the Decision and Accusation to the Chief of Staff or the Chief Executive  
21 Officer at every hospital where privileges or membership are extended to Respondent, at any  
22 other facility where Respondent engages in the practice of podiatric medicine, including all  
23 physician and locum tenens registries or other similar agencies, and to the Chief Executive  
24 Officer at every insurance carrier which extends malpractice insurance coverage to Respondent.  
25 Respondent shall submit proof of compliance to the Division or its designee within 15 calendar  
26 days.

27 This condition shall apply to any change(s) in hospitals, other facilities, or insurance carrier.

28 ///

1           3.    PHYSICIAN ASSISTANTS Prior to receiving assistance from a physician assistant,  
2 Respondent must notify the supervising physician of the terms and conditions of his probation.

3           4.    OBEY ALL LAWS Respondent shall obey all federal, state, and local laws, all rules  
4 governing the practice of podiatric medicine in California and remain in full compliance with any  
5 court ordered criminal probation, payments, and other orders.

6           5.    QUARTERLY DECLARATIONS Respondent shall submit quarterly declarations  
7 under penalty of perjury on forms provided by the Board, stating whether there has been  
8 compliance with all the conditions of probation. Respondent shall submit quarterly declarations  
9 not later than 10 calendar days after the end of the preceding quarter.

10          6.    PROBATION COMPLIANCE UNIT Respondent shall comply with the Board's  
11 probation unit. Respondent shall, at all times, keep the Board informed of his business and  
12 residence addresses. Changes of such addresses shall be immediately communicated in writing to  
13 the Board or its designee. Under no circumstances shall a post office box serve as an address of  
14 record, except as allowed by Business and Professions Code section 2021, subdivision (b).

15          Respondent shall not engage in the practice of podiatric medicine in Respondent's place of  
16 residence. Respondent shall maintain a current and renewed California doctor of podiatric  
17 medicine's license.

18          Respondent shall immediately inform the Board or its designee, in writing, of travel to any  
19 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than 30  
20 calendar days.

21          7.    INTERVIEW WITH THE BOARD OR ITS DESIGNEE Respondent shall be  
22 available in person for interviews either at Respondent's place of business or at the probation unit  
23 office with the Board or its designee, upon request, at various intervals and either with or without  
24 notice throughout the term of probation.

25          8.    RESIDING OR PRACTICING OUT-OF-STATE In the event Respondent should  
26 leave the State of California to reside or to practice, Respondent shall notify the Board or its  
27 designee in writing 30 calendar days prior to the dates of departure and return. Non-practice is  
28 defined as any period of time exceeding 30 calendar days in which Respondent is not engaging in

1 any activities defined in section 2472 of the Business and Professions Code.

2 All time spent in an intensive training program outside the State of California which has  
3 been approved by the Board or its designee shall be considered as time spent in the practice of  
4 medicine within the State. A Board-ordered suspension of practice shall not be considered as a  
5 period of non-practice. Periods of temporary or permanent residence or practice outside  
6 California will not apply to the reduction of the probationary term. Periods of temporary or  
7 permanent residence or practice outside California will relieve Respondent of the responsibility to  
8 comply with the probationary terms and conditions, with the exception of this condition, and the  
9 following terms and conditions of probation: Obey All Laws; Probation Unit Compliance; and  
10 Cost Recovery.

11 Respondent's license shall be automatically cancelled if Respondent's periods of temporary  
12 or permanent residence or practice outside California totals two years. However, Respondent's  
13 license shall not be cancelled as long as Respondent is residing and practicing podiatric medicine  
14 in another state of the United States and is on active probation with the medical licensing  
15 authority of that state, in which case the two-year period shall begin on the date probation is  
16 completed or terminated in that state.

17 9. FAILURE TO PRACTICE PODIATRIC MEDICINE - CALIFORNIA RESIDENT

18 In the event Respondent resides in the State of California and for any reason Respondent stops  
19 practicing podiatric medicine in California, Respondent shall notify the Board or its designee in  
20 writing within 30 calendar days prior to the dates of non-practice and return to practice. Any  
21 period of non-practice within California as defined in this condition will not apply to the  
22 reduction of the probationary term and does not relieve Respondent of the responsibility to  
23 comply with the terms and conditions of probation. Non-practice is defined as any period of time  
24 exceeding thirty calendar days in which Respondent is not engaging in any activities defined in  
25 section 2472 of the Business and Professions Code.

26 All time spent in an intensive training program which has been approved by the Board or its  
27 designee shall be considered time spent in the practice of medicine. For purposes of this  
28 condition, non-practice due to a Board-ordered suspension or in compliance with any other

1 condition of probation shall not be considered a period of non-practice.

2 Respondent's license shall be automatically cancelled if Respondent resides in California  
3 and for a total of two years, fails to engage in California in any of the activities described in  
4 Business and Professions Code section 2472.

5 10. COMPLETION OF PROBATION Respondent shall comply with all financial  
6 obligations (e.g., cost recovery, restitution, probation costs) not later than 120 calendar days prior  
7 to the completion of probation. Upon successful completion of probation, Respondent's  
8 certificate will be fully restored.

9 11. VIOLATION OF PROBATION If Respondent violates probation in any respect, the  
10 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and  
11 carry out the disciplinary order that was stayed. If an accusation or petition to revoke probation is  
12 filed against Respondent during probation, the Board shall have continuing jurisdiction until the  
13 matter is final, the period of probation shall be extended until the matter is final, and no petition  
14 for modification of penalty shall be considered while there is an accusation or petition to revoke  
15 probation pending against respondent.

16 12. COST RECOVERY Within 90 calendar days from the effective date of the Decision  
17 or by a payment plan approved by the Board or its designee, Respondent shall reimburse the  
18 Board the amount of \$20,238.32 for its investigative and prosecution costs. The filing of  
19 bankruptcy or period of non-practice by Respondent shall not relieve the Respondent of his  
20 obligation to reimburse the Board for its costs.

21 13. LICENSE SURRENDER Following the effective date of this Decision, if  
22 Respondent ceases practicing due to retirement or health reasons or is otherwise unable to satisfy  
23 the terms and conditions of probation, Respondent may request the voluntary surrender of his  
24 license. The Board reserves the right to evaluate Respondent's request and to exercise its  
25 discretion whether to grant the request or to take any other action deemed appropriate and  
26 reasonable under the circumstances. Upon formal acceptance of the surrender, Respondent shall  
27 within 15 calendar days deliver his wallet and wall certificate to the Board or its designee and  
28 Respondent shall no longer practice podiatric medicine. Respondent will no longer be subject to

1 the terms and conditions of probation and the surrender of Respondent's license shall be deemed  
2 disciplinary action. If Respondent re-applies for a podiatric medical license, the application shall  
3 be treated as a petition for reinstatement of a revoked certificate.

4 14. PROBATION MONITORING COSTS Respondent shall pay the costs associated  
5 with probation monitoring each and every year of probation as designated by the Board, which  
6 may be adjusted on an annual basis. Such costs shall be payable to the Board of Podiatric  
7 Medicine and delivered to the Board or its designee within 60 days after the start of the new fiscal  
8 year. Failure to pay costs within 30 calendar days of this date is a violation of probation.

9 15. NOTICE TO EMPLOYEES Respondent shall, upon or before the effective date of  
10 this Decision, post or circulate a notice which actually recites the offenses for which Respondent  
11 has been disciplined and the terms and conditions of probation to all employees involved in his  
12 practice. Within 15 days of the effective date of this Decision, Respondent shall cause his  
13 employees to report to the Board in writing, acknowledging the employees have read the  
14 Accusation and Decision in the case and understand Respondent's terms and conditions of  
15 probation.

16 16. CHANGES OF EMPLOYMENT Respondent shall notify the Board in writing,  
17 through the assigned probation officer, of any and all changes of employment, location, and  
18 address within 30 days of such change.

19 17. COMPLIANCE WITH REQUIRED CONTINUING MEDICAL EDUCATION  
20 Respondent shall submit satisfactory proof biennially to the Board of compliance with the  
21 requirement to complete fifty hours of approved continuing medical education and meet  
22 continuing competence requirements for re-licensure during each two-year renewal period.

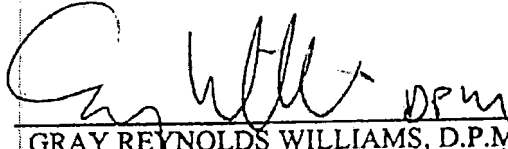
23 18. FUTURE ADMISSIONS CLAUSE If Respondent should petition for early  
24 termination or modification of probation, or if an Accusation and/or Petition to Revoke Probation  
25 is filed against the Respondent before the Board, or Respondent should ever apply or reapply for  
26 a new license or certification, and/or file a petition for reinstatement of a license, before the Board  
27 or any other health care licensing action agency in the State of California, all of the charges and  
28 allegations contained in the Accusation No. 500-2021-001219 shall be deemed to be true, correct,

1 and fully admitted by Respondent for the purpose of any Statement of Issues or any disciplinary  
2 proceeding seeking to deny, restrict, or revoke licensure or any petition proceeding seeking to  
3 reinstate licensure or modify probation.

4 ACCEPTANCE

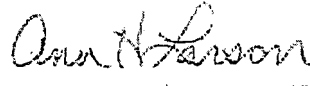
5 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
6 discussed it with my attorney, Ann H. Larson. I understand the stipulation and the effect it will  
7 have on my Doctor of Podiatric Medicine License. I enter into this Stipulated Settlement and  
8 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
9 Decision and Order of the Podiatric Medical Board.

10  
11 DATED: 9/17/24

  
12 GRAY REYNOLDS WILLIAMS, D.P.M.  
Respondent

13 I have read and fully discussed with Respondent Gray Reynolds Williams, D.P.M. the  
14 terms and conditions and other matters contained in the above Stipulated Settlement and  
15 Disciplinary Order. I approve its form and content.

16  
17 DATED: 9/17/2024

  
18 ANN H. LARSON, ESQ.  
Attorney for Respondent

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28 ///

**ENDORSEMENT**

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

DATED: Sept. 17, 2024

Respectfully submitted,

ROB BONTA  
Attorney General of California  
JUDITH T. ALVARADO  
Supervising Deputy Attorney General

Peggie Bradford  
Tarwater

Digitally signed by Peggie  
Bradford Tarwater  
Date: 2024.09.17 17:03:37  
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PEGGIE BRADFORD TARWATER  
Deputy Attorney General  
*Attorneys for Complainant*

LA2023604379

**Exhibit A**

**Accusation No. 500-2021-001219**

1 ROB BONTA  
Attorney General of California  
2 JUDITH T. ALVARADO  
Supervising Deputy Attorney General  
3 LATRICE R. HEMPHILL  
Deputy Attorney General  
4 State Bar No. 285973  
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6 Facsimile: (916) 731-2117  
*Attorneys for Complainant*  
7

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

12 In the Matter of the Accusation Against:

Case No. 500-2021-001219

13 **GRAY REYNOLDS WILLIAMS, D.P.M.**  
14 **975 Sereno Drive**  
**Vallejo, CA 94589-2441**

**ACCUSATION**

15 **Doctor of Podiatric Medicine License**  
16 **No. 4081,**

17 Respondent.  
18

19  
20 **PARTIES**

21 1. Brian Naslund (Complainant) brings this Accusation solely in his official capacity as  
22 the Executive Officer of the Podiatric Medical Board, Department of Consumer Affairs (Board).

23 2. On or about July 1, 1997, the Podiatric Medical Board issued Doctor of Podiatric  
24 Medicine License Number 4081 to GRAY REYNOLDS WILLIAMS, D.P.M. (Respondent). The  
25 Doctor of Podiatric Medicine License was in full force and effect at all times relevant to the  
26 charges brought herein and will expire on October 31, 2024, unless renewed.

27 ///

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## JURISDICTION

3. 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.

4. Section 2222 of the Code states:

The California Board of Podiatric Medicine shall enforce and administer this article as to doctors of podiatric medicine. Any acts of unprofessional conduct or other violations proscribed by this chapter are applicable to licensed doctors of podiatric medicine and wherever the Medical Quality Hearing Panel established under Section 11371 of the Government Code is vested with the authority to enforce and carry out this chapter as to licensed physicians and surgeons, the Medical Quality Hearing Panel also possesses that same authority as to licensed doctors of podiatric medicine.

The California Board of Podiatric Medicine may order the denial of an application or issue a certificate subject to conditions as set forth in Section 2221, or order the revocation, suspension, or other restriction of, or the modification of that penalty, and the reinstatement of any certificate of a doctor of podiatric medicine within its authority as granted by this chapter and in conjunction with the administrative hearing procedures established pursuant to Sections 11371, 11372, 11373, and 11529 of the Government Code. For these purposes, the California Board of Podiatric Medicine shall exercise the powers granted and be governed by the procedures set forth in this chapter.

## STATUTORY PROVISIONS

5. 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.

6. 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

7. Section 2497.5 of the Code states:

(a) The board may request the administrative law judge, under his or her proposed decision in resolution of a disciplinary proceeding before the board, to direct any licensee found guilty of unprofessional conduct to pay to the board a sum not to exceed the actual and reasonable costs of the investigation and prosecution of the case.

(b) The costs to be assessed shall be fixed by the administrative law judge and shall not be increased by the board unless the board does not adopt a proposed decision and in making its own decision finds grounds for increasing the costs to be assessed, not to exceed the actual and reasonable costs of the investigation and prosecution of the case.

(c) When the payment directed in the board's order for payment of costs is not made by the licensee, the board may enforce the order for payment by bringing an action in any appropriate court. This right of enforcement shall be in addition to any other rights the board may have as to any licensee directed to pay costs.

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

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

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

(f) All costs recovered under this section shall be deposited in the Board of Podiatric Medicine Fund as a reimbursement in either the fiscal year in which the costs are actually recovered or the previous fiscal year, as the board may direct.

### FACTUAL ALLEGATIONS

8. Respondent is a podiatrist at Kaiser Permanente (Kaiser) in Vallejo, California. He is board certified in foot surgery and reconstructive rear foot and ankle surgery.

9. Patient A was a long-standing patient at Kaiser and had numerous visits with Respondent to address Achilles tendonitis.

10. On or about February 1, 2017, Patient A<sup>1</sup> presented to Kaiser for a "foot problem." Dr. H.P. treated Patient A during this visit, and noted that Patient A's shoe caused a callus/blister on her left heel. Patient A indicated that she removed the top layer of skin from the callus the day before and was concerned about infection. Dr. H.P. found that Patient A had an ulcer on the left foot, but there was no evidence of an infection. Dr. H.P. instructed Patient A to apply Polysporin<sup>2</sup> and to keep the ulcer protected. Patient A was also instructed to call or return to Kaiser if the symptoms worsened.

11. On or about February 3, 2017, Patient A sent Respondent a message, through Kaiser's messaging portal, regarding the callus on her heel inquiring how quickly she could anticipate the callus to heal. Respondent sent a response providing at-home treatment options for Patient A.

12. On or about February 6, 2017, Patient A sent Respondent another message complaining that her heel was worsening despite her efforts, which included using corn removers and aperture pads. Respondent instructed Patient A to book an in-person appointment.

13. On or about February 13, 2017, Patient A presented to Respondent for a recheck of the callus. Respondent pared away at the callus and instructed Patient A to use aperture pads with antibiotic ointment and Band-Aids. Respondent noted the possibility of putting Patient A in a cast, if the heel was not better in two weeks.

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<sup>1</sup> The patient is identified as "Patient A" in this Accusation to protect her privacy.

<sup>2</sup> Polysporin, also known as bacitracin and polymyxin, is a combination topical antibiotic used to help prevent infections from cuts, scrapes and/or burns.

1           14. Throughout February 2017, Patient A continued to send Respondent messages  
2 complaining about the heel pain. Another practitioner also saw patient A during this time and,  
3 after a physical evaluation, Dr. T.N. indicated Patient A had a plantar medial heel wound<sup>3</sup> with an  
4 underlying ulceration. Dr. T.N. debrided the callus (wound) and treated it with silver nitrate,  
5 padding, and a walker.

6           15. On or about March 24, 2017, Dr. T.N. noted that the heel ulceration had healed with  
7 residual callus. Later in the month, Patient A again complained about the wound, indicating that  
8 it was getting larger.

9           16. On or about June 6, 2017, Patient A presented to Respondent for a recheck of the  
10 wound. Respondent noted that Patient A's wound was most likely a wart, and Respondent  
11 scheduled an excision and biopsy with hyfrecation<sup>4</sup> of the wart.

12           17. On or about June 13, 2017, the wart was excised. Respondent noted that the base of  
13 the lesion was somewhat irregular and granular, and did not peel away from the basement  
14 membrane easily. Respondent indicated that he would recheck the site in two weeks and if there  
15 was a quick regrowth of the wart, he would conduct a biopsy.

16           18. On or about June 28, 2017, Respondent noted that the wound was progressing  
17 normally and Patient A would be reevaluated in six weeks. However, on or about June 30, 2017,  
18 Patient A sent a message complaining that the wound looked worse.

19           19. On or about August 8, 2017, Respondent evaluated Patient A and noted a possible  
20 recurrence of the wart, although there was no ulceration or maceration. Respondent treated the  
21 wart with Mediplast.<sup>5</sup>

22           20. Throughout the remainder of August 2017, Patient A repeatedly complained that the  
23 wound pain was increasing.

24           21. On or about September 6, 2017, Patient A presented to Respondent, who found that  
25 the heel was completely healed and there was no obvious regrowth of the wart.

26           <sup>3</sup> Wound is used interchangeably with "lesion" throughout this Accusation.

27           <sup>4</sup> Hyfrecation is a minor surgery procedure performed for lesions such as warts and skin  
tags. A small needle with an electrical pulse is used to burn away the lesions.

28           <sup>5</sup> Mediplast, also known as salicylic acid, is used on the skin to treat common skin and  
foot warts, by causing the wart to gradually peel off.

22. From October 2017 through February 2018, there was a cycle of wound pain and additional treatment to the wound.

23. Throughout March 2018, Respondent noted that the wound was healing and Patient A felt better. However, by July 2018, Respondent noted that the wound had returned and was growing larger.

24. On or about July 27, 2018, Respondent conducted a biopsy of the wound. The pathology report indicated there was an overall histologic impression of a melanoma.<sup>6</sup> Consequently, on or about August 8, 2018, Respondent discussed the diagnosis with Patient A and referred her to an oncologist.

**FIRST CAUSE FOR DISCIPLINE**

(Gross Negligence)

25. Respondent is subject to disciplinary action under Code section 2234, subdivision (b), in that he was grossly negligent in his care and treatment of Patient A. The circumstances are as follows:

26. Complainant hereby re-alleges the facts set forth in paragraphs 8 through 24, above, as though fully set forth.

27. The standard of care when treating a skin lesion is to monitor the lesion to see if it acts as expected and continues to progress as expected, therefore validating the appropriateness of the current treatment plan. If the lesion does not progress as expected, then it is necessary to further evaluate or perform additional testing to see if there may be another diagnosis. There are many atypical presentations of any lesion. As such, a biopsy offers the best diagnostic information when a lesion does not progress as expected. Further, when there are repeated recurrences of a lesion, or when a lesion does not fit the classic mold, a biopsy is essential.

28. Respondent evaluated Patient A's wound multiple times. The wound, and associated pain, seemingly got better but would regress. In Respondent's chart notes dated June 13, 2017, he noted that the base of the wound did not appear as expected for a wart. This should have been indication to obtain a specimen via biopsy.

<sup>6</sup> Melanoma is a form of skin cancer that begins in the pigment-producing cells.

29. Throughout the treatment period, Respondent and Dr. T.N. noted several times that they would recommend a biopsy if the wound did not progress. However, a biopsy did not occur until July 27, 2018. Respondent's failure to timely obtain a biopsy after recognizing that the wound did not fit the classic appearance and after multiple failed treatments to eradicate the wound constitutes an extreme departure from the standard of care.

## SECOND CAUSE FOR DISCIPLINE

(Failure to Maintain Adequate and Accurate Medical Records)

30. Respondent is subject to disciplinary action under Code section 2266 in that he failed to maintain adequate and accurate medical records pertaining to his care and treatment of Patient

A. The circumstances are as follows:

31. Complainant hereby re-alleges the facts set forth in paragraphs 10 through 24, above, as though fully set forth.

32. The standard of care is to document a patient's condition accurately, as a source of reference for the primary provider and for other providers, should they need to get involved with the care and treatment of the patient. Specifically, since there are clear variations to any skin lesion, proper documentation is imperative.

33. Respondent's documentation of Patient A's wound was poor. There was no documentation of size of the wound, which was simply described as a wart in the records. Respondent also failed to include common characteristics used to describe warts. Further, Respondent did not document how fast the wound was growing and did not include notes with each photograph found in the records.

34. Respondent's failure to accurately document clinical findings constitutes the failure to maintain adequate and accurate medical records for Patient A and is a simple departure of the standard of care.

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1 PRAYER

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


4 1. Revoking or suspending Doctor of Podiatric Medicine License Number 4081, issued  
5 to Respondent Gray Reynolds Williams, D.P.M.;

6 2. Ordering Respondent Gray Reynolds Williams, D.P.M. to pay the Board the  
7 reasonable costs of the investigation and enforcement of this case;

8 3. Ordering Respondent Gray Reynolds Williams, D.P.M. to pay the Board the  
9 probation monitoring costs, if placed on probation; and

10 3. Taking such other and further action as deemed necessary and proper.  
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13 DATED: JAN 19 2024

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15 BRIAN NASLUND  
16 Executive Officer  
17 Podiatric Medical Board  
18 Department of Consumer Affairs  
19 State of California  
20 Complainant

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