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

In the Matter of the Accusation and Petition to
Revoke Probation Against:

Case No. 800-2025-115961

LARRY TEIK-MAN KHOO, M.D.
12400 Ventura Blvd.
Studio City, CA 91604

DEFAULT DECISION AND ORDER

[Gov. Code, § 11520]

Physician's and Surgeon's Certificate
No. A 62896.

— 1 —

Respondent.

FINDINGS OF FACT

1. On March 20, 2025, Complainant Reji Varghese, in his official capacity as the Executive Director of the Medical Board of California, Department of Consumer Affairs (Board), filed Accusation and Petition to Revoke Probation No. 800-2025-115961 against Larry Teik-Man Khoo, M.D. (Respondent) before the Board. A true and correct copy of the Accusation and Petition to Revoke Probation is attached hereto as Exhibit A and is incorporated herein by reference.

2. On June 27, 1997, the Board issued Physician's and Surgeon's Certificate Number A 62896 to Larry Teik-Man Khoo, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought herein. It expired on May

1 31, 2025, and was not renewed. A true and correct copy of a Certification of License Status for
2 Respondent, including his address of record with the Board, is attached as **Exhibit 1** to the
3 Declaration of Vladimir Shalkevich, contained in the simultaneously submitted Default Decision
4 Evidence Packet. The Default Decision Evidence Packet is hereby incorporated by reference, in
5 its entirety, as if fully set forth herein.

6 3. Section 118, subdivision (b) of the Code provides:

7 The suspension, expiration, or forfeiture by operation of law of a license
8 issued by a board in the department, or its suspension, forfeiture, or cancellation by
9 order of the board or by order of a court of law, or its surrender without the written
10 consent of the board, shall not, during any period in which it may be renewed,
11 restored, reissued, or reinstated, deprive the board of its authority to institute or
12 continue a disciplinary proceeding against the licensee upon any ground provided
13 by law or to enter an order suspending or revoking the license or otherwise taking
14 disciplinary action against the license on any such ground.

15 4. Respondent's Certification of License Status shows that effective March 6, 2023, in a
16 prior disciplinary action titled *In the Matter of the First Amended Accusation Against Larry Teik-*
17 *Man Khoo, MD.*, before the Board, in Case Number 800-2018-049454, Respondent's license was
18 revoked, but the revocation was stayed and Respondent's license was placed on probation (in
19 connection with allegations of Gross Negligence, Repeated Negligent Acts and Inadequate and
20 Inaccurate Record Keeping in the care and treatment of one patient), with terms and conditions,
21 including, requirements to complete a Clinical Competence Assessment Program, a Medical
22 Records Keeping Course, an Ethics Course, and to establish a Practice Monitor. That decision is
23 now final. A true and correct copy of that Decision is attached as **Exhibit 2** to the Declaration of
24 Vladimir Shalkevich, contained in the Default Decision Evidence Packet.

25 5. Respondent has not completed any of the remedial education ordered by the Board
26 and did not install a practice monitor because on April 27, 2023, shortly after the Board's
27 decision became effective, Respondent notified his probation monitor that he would enter "non-
28 practice" status. Respondent has remained in that status ever since. On January 18, 2024,
29 Respondent notified his probation monitor by letter that he would be traveling outside of
30 California for more than 30 days. Respondent never notified his probation monitor that he would
31 resume the practice of medicine, or that he returned to California. Respondent never paid any

1 cost recovery, or probation monitoring costs that accrued prior to January 18, 2024. (Declaration
2 of Maggie Lee, contained in the Default Decision Evidence Packet.)

3 6. On March 20, 2025, Merlene Francis, an employee of the Board, served by Certified
4 Mail and First Class Mail a copy of Accusation and Petition to Revoke Probation No. 800-2025-
5 115961, (Accusation and PRP), Statement to Respondent, Notice of Defense, Request for
6 Discovery, and Government Code sections 11507.5, 11507.6, and 11507.7 (collectively, with the
7 Accusation and PRP, the Accusation Packet) to Respondent's address of record, which was and is
8 12400 Ventura Blvd, Studio City, CA 91604-2406. In addition, the Accusation Packet was
9 served on Respondent's confidential residence address which he provided to the Board pursuant
10 to Business and Professions Code section 2021, subdivision (b). A true and correct copy of the
11 Accusation Packet, and Declaration of Service are attached as **Exhibit 3** to the Declaration of
12 Vladimir Shalkevich, contained in the Default Decision Evidence Packet.

13 7. Service of the Accusation and Petition to Revoke Probation was effective as a matter
14 of law under the provisions of Government Code section 11505, subdivision (c).

15 8. On June 11, 2025, the United States Postal Service (USPS) confirmed that the
16 Accusation and Petition to Revoke Probation, together with all of the related documents were
17 delivered to Respondent's address of record. A true and correct copy of the USPS delivery
18 confirmation is attached as **Exhibit 4** to the Declaration of Vladimir Shalkevich, contained in the
19 Default Decision Evidence Packet.

20 9. On June 11, 2025, USPS confirmed that the Accusation and Petition to Revoke
21 Probation, together with all the related documents were delivered to Respondent's confidential
22 Residence address which he provided to the Board pursuant to Business and Professions Code
23 section 2021, subdivision (b). A true and correct copy of the USPS delivery confirmation is
24 attached as **Exhibit 5** to the Declaration of Vladimir Shalkevich, contained in the Default
25 Decision Evidence Packet.

26 10. On April 15, 2025, Teresa DePaz, an employee of the California Department of
27 Justice, served by First Class Mail a Courtesy Notice of Default, which also included a copy of
28 the a copy of the Accusation Packet, on Respondent's confidential address, which he provided to

1 the Board pursuant to Business and Professions Code section 2021, subdivision (b), on his last
2 known business address, and his last known residence address. A true and correct copy of the
3 Courtesy Notice of Default, which included the Accusation packet, as well as the Declaration of
4 Service executed by Ms. DePaz, a California Department of Justice employee, are attached as
5 **Exhibit 6** to Declaration of Vladimir Shalkevich, contained in the Default Decision Evidence
6 Packet.

7 11. On May 2, 2025, the Courtesy Notice of Default and Accusation Packet that was
8 mailed by first class mail to Respondent's last known business address was returned as
9 undeliverable. A true and correct copy of the returned envelope is attached as **Exhibit 7** to the
10 Declaration of Vladimir Shalkevich contained in the Default Decision Evidence Packet.

11 12. The remaining service copies of the Courtesy Notice of Default, which were sent to
12 Respondent's address of record, his confidential residence address and his last known address
13 were not returned by the Post Office.

14 13. As of July 16, 2025, Respondent has not returned a Notice of Defense and has not
15 communicated with Complainant's counsel. (Declaration of Vladimir Shalkevich, contained in
16 the Default Decision Evidence Packet.)

17 14. Government Code section 11506 states, in pertinent part:

18 (c) The respondent shall be entitled to a hearing on the merits if the respondent
19 files a notice of defense, and the notice shall be deemed a specific denial of all parts
20 of the accusation not expressly admitted. Failure to file a notice of defense shall
constitute a waiver of respondent's right to a hearing, but the agency in its discretion
may nevertheless grant a hearing.

21 15. Respondent failed to file a Notice of Defense within 15 days after service upon him
22 of the Accusation and Petition to Revoke Probation, and therefore waived his right to a hearing on
23 the merits of Accusation and Petition to Revoke Probation No. 800-2025-115961.

24 16. California Government Code section 11520 states, in pertinent part:

25 (a) If the respondent either fails to file a notice of defense or to appear at the
26 hearing, the agency may take action based upon the respondent's express admissions
27 or upon other evidence and affidavits may be used as evidence without any notice to
respondent; and where the burden of proof is on the respondent to establish that the
respondent is entitled to the agency action sought, the agency may act without taking
evidence.

1 17. The declaration of the Board's expert Joseph Chen, M.D. is contained in the Default
2 Decision Evidence Packet and incorporated herein by reference. The declaration of Respondent's
3 probation monitor Maggie Lee is contained in the Default Decision Evidence Packet and
4 incorporated herein by reference. Pursuant to its authority under Government Code section
5 11520, the Board finds Respondent is in default. The Board will take action without further
6 hearing and, based on Respondent's admissions by way of default and the evidence before it,
7 including evidence contained in all the exhibits contained in the Default Decision Evidence
8 Packet. Accordingly, the Board finds that Respondent's license is subject to discipline for
9 committing unprofessional conduct, as alleged in Accusation and Petition to Revoke Probation
10 No. 800-2025-115961. Further, the Board finds that Respondent violated terms and conditions 9,
11 10 and 12 of his probation, as alleged in Accusation and Petition to Revoke Probation No. 800-
12 2025-115961, and Respondent's probation is subject to revocation.

13 18. Business and Professions Code section 125.3 states, in pertinent part:

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

19 19. Respondent has accrued the costs of probation monitoring, which are due pursuant to
20 the terms of the Board's Decision in case number 800-2018-049454, in the amount of \$4,737.65,
21 per Declaration of Maggie Lee, contained in the Default Decision Evidence Packet and
22 incorporated herein by reference.

23 20. Respondent has not paid cost recovery ordered by the Board's prior Decision in case
24 number 800-2018-049454. Respondent's outstanding cost recovery is \$10,982.50, per Declaration
25 of Maggie Lee, contained in the Default Decision Evidence Packet and incorporated herein by
26 reference.

27 21. Respondent's total unpaid cost recovery and accrued probation monitoring costs that
28 are due to the Board are \$15,720.15

22. **Exhibit 8**, contained in the Default Decision Evidence Packet and incorporated herein by reference is a Certification of Investigative Costs in the amount of \$12,810.50, for the investigation of this case.

23. **Exhibit 9**, contained in the Default Decision Evidence Packet and incorporated herein by reference is a Certification of the legal costs incurred in this matter in the amount of \$14,954.25.

24. The total costs of investigation and enforcement in this case are \$27,764.75.

25. Based on these certifications, the Board find that the cost amount is reasonable.

DETERMINATION OF ISSUES

1. Based on the foregoing findings of fact, Respondent Larry Teik-Man Khoo, M.D. has subjected his Physician's and Surgeon's Certificate No. A 62896 to discipline.

2. Service of Accusation and Petition to Revoke Probation No. 800-2025-115961 and related documents was proper and in accordance with the law.

3. The Board has jurisdiction to adjudicate this case by default.

4. The Medical Board of California is authorized to discipline Respondent's license based upon the following violations alleged in the Accusation and Petition to Revoke Probation

a. Gross Negligence in violation of Business and Professions Code section 2234, subdivision (b). (See Declaration of Joseph Chen, M.D., page 3, paragraph 10 of Exhibit 1 of Default Decision Evidence Packet);

b. Failure to keep adequate and accurate medical records in violation of Business and Professions Code section 2266. (See Declaration of Joseph Chen, M.D., page 4, paragraph 11 of Exhibit 1 of Default Decision Evidence Packet);

c. Failure to attend and participate in an interview with the Board investigators in violation of Business and Professions Code section 2234, subdivision (g). (See Exhibit 3 to Declaration of Vladimir Shalkevich, Exhibit 3 of Default Decision Evidence Packet-Accusation and Petition to Revoke Probation, page 6, paragraph 22);

- d. Violation of Probation Condition 12 – failure to engage in practice of medicine for more than two years while on probation. (See Declaration of Maggie Lee, page 2, paragraph 6 (A) of Exhibit 2 of Default Decision Evidence Packet);
- e. Violation of Probation Condition 9 – failure to submit quarterly declarations. (See Declaration of Maggie Lee, page 2, paragraph 6 (B) of Exhibit 2 of Default Decision Evidence Packet); and,
- f. Violation of Probation Condition 10 – failure to abide by the general conditions of probation. (See Declaration of Maggie Lee, page 2, paragraphs 6 (C) through 6 (G) and 7, of Exhibit 2 of Default Decision Evidence Packet).

ORDER

IT IS SO ORDERED that the Physician's and Surgeon's Certificate number A 62896, issued to Respondent LARRY TEIK-MAN KHOO, M.D. is hereby revoked.

Respondent is ordered to pay the Board reasonable costs of investigation and prosecution in the amount of \$27,764.75. Respondent is further ordered to pay the Board an additional \$15,720.15, for unpaid cost recovery ordered by the Board in its Decision in case number 800-2018-049454, and accrued probation monitoring costs.

The filing of bankruptcy by Respondent shall not relieve Respondent of his responsibility to reimburse the Board for its costs. Respondent's Physician's and Surgeon's Certificate may not be renewed or reinstated unless all costs ordered under Business and Professions Code section 125.3 have been paid.

If Respondent ever files an application for re-licensure or reinstatement in the State of California, the Board shall treat it as a petition for reinstatement of a revoked license. Respondent must comply with all the laws, regulations, and procedures for reinstatement of a revoked license in effect at the time the petition is filed.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within

seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective at 5:00 p.m. on AUG 27 2023.

It is so ORDERED AUG 15 2025

AUG 27 2025

AUG 15 2025

REJI VARGHESE

REMI VARGHESE
EXECUTIVE DIRECTOR

EXECUTIVE DIRECTOR
MEDICAL BOARD OF CALIFORNIA

MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS

DEPARTMENT OF CONSUMER AFFAIRS

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Exhibit A

Accusation and Petition to Revoke Probation No. 800-2025-115961

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13 *Attorneys for Complainant*

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

In the Matter of the Accusation and Petition to
Revoke Probation Against:

Case No. 800-2025-115961

Larry Teik-Man Khoo, M.D.
12400 Ventura Blvd
Studio City, CA 91604-2406

ACCUSATION AND
PETITION TO REVOKE PROBATION

Physician's and Surgeon's Certificate
No. A 62896,

Respondent.

PARTIES

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

2. On or about June 27, 1997, the Medical Board issued Physician's and Surgeon's
Certificate Number A 62896 to Larry Teik-Man Khoo, M.D. (Respondent). The Physician's and
Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
herein and will expire on May 31, 2025, unless renewed.

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JURISDICTION

2 3. This Accusation and Petition to Revoke Probation¹ is brought before the Board, under
3 the authority of the following laws. All section references are to the Business and Professions
4 Code (Code) unless otherwise indicated.

5 4. Section 2227 of the Code states:

(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:

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

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

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

15 (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.

17 (b) Any matter heard pursuant to subdivision (a), except for warning letters,
18 medical review or advisory conferences, professional competency examinations,
19 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

21 5. Section 2234 of the Code states:

22 The board shall take action against any licensee who is charged with
23 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.

¹ This matter consists of case number 800-2022-087545, pertaining to the Accusation arising from Respondent's care and treatment of Patient 1, consolidated under the primary case number 800-2025-115961, pertaining to Respondent's violation of his probation.

(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 no later than 30 calendar days after being notified by the board. This subdivision shall only apply to a certificate holder who is the subject of an investigation by the board.

(h) Any action of the licensee, or another person acting on behalf of the licensee, intended to cause their patient or their patient's authorized representative to rescind consent to release the patient's medical records to the board or the Department of Consumer Affairs, Health Quality Investigation Unit.

(i) Dissuading, intimidating, or tampering with a patient, witness, or any person in an attempt to prevent them from reporting or testifying about a licensee.

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.

REGULATORY PROVISIONS

7. California Code of Regulation, Title 16, section 1303 provides: "Each person holding a certificate, license, permit or any other authority issued under the Medical Practice Act shall file his or her proper and current mailing address with the division in its principal office, and shall immediately notify the division at its office of any and all changes of mailing address, giving both the old and new address."

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COST RECOVERY

2 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licensee found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
6 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
7 included in a stipulated settlement.

ALLEGATIONS PERTAINING TO THE ACCUSATION

9 9. On or about April 3, 2022, the Board received a complaint from Patient 1.² The
10 Board investigated the complaint and discovered as follows:

11 10. Patient 1 had a long-standing foraminal narrowing at the C5-6 vertebral space in her
12 neck. She first saw Respondent on or about February 13, 2020. Respondent's physical
13 examination findings were significant for some weakness in the bilateral deltoids and triceps.
14 Imaging findings were significant for degenerative changes seen from C4-5 to C6-7 levels.
15 Respondent ordered electrophysiologic testing of the upper and lower extremities, as well as
16 flexion and extension x-rays of the cervical spine.

17 11. Patient 1 next saw Respondent on or about April 22, 2020. This was a virtual
18 facetime encounter due to pandemic restrictions. The physical exam appears to have been copied
19 from the prior encounter. During this encounter, Respondent recommended a C4-5 and C5-6
20 anterior cervical discectomy and fusion surgery. Patient 1 was given a prescription for a cervical
21 collar, Topamax, Celebrex and physical therapy.

12. An in-person follow-up visit took place on or about June 9, 2020, during which
13. Respondent documented that the patient had bilateral trapezius and shoulder pain with tingling
14. worse to the right arm and right grip weakness. The patient consented to a two level Anterior
15. Cervical Discectomy & Fusion (ACDF) procedure at C4-5 and C5-6.

1 13. Patient 1 underwent surgery by Respondent on July 13, 2020, and was discharged on
2 the same day. Respondent's operative note described a routine anterior cervical discectomy and
3 fusion. The patient appeared to tolerate the procedure well.

4 14. Patient 1 returned to Respondent's clinic for follow-up on July 24, 2020. She
5 described left sided arm pain, primarily involving the bicep. Patient 1 was referred to physical
6 therapy and recommendations were made for limiting strenuous activity. She was given
7 prescriptions for Lidoderm patches and a Medrol taper. Flexion/extension cervical spine x-rays
8 were obtained.

9 15. Patient 1 was seen for follow up on September 8, 2020, and at this time she was
10 complaining of pain down the left arm, that was by her account not present prior to her anterior
11 cervical discectomy and fusion surgery. The patient underwent a repeat MRI that, Respondent
12 documented, suggested "tightness" at the left C5-6 level post-surgery. Respondent then reviewed
13 conservative options such as physical therapy as well as potential additional surgical procedures.
14 Respondent noted that the patient wished to think about her options and return to clinic in three
15 months.

16 16. Patient 1 was taken to the OR by Respondent on September 25, 2020, for bilateral
17 transforaminal epidural injection at the C5-6 and C6-7 levels. In addition, the patient underwent
18 bilateral C5, C6, and C7 median branch point blocks along with left sided supraspinatus block.

19 17. Patient 1 returned to Respondent's clinic on November 12, 2020, with complaints of
20 bilateral arm pain, numbness and weakness. According to Respondent's note of that date, Patient
21 1 stated that the pain was worse on the left than it was on the right. Respondent noted that Patient
22 1 had undergone epidural steroid injections on September 25th, 2020. It is noted that the patient
23 underwent a CT scan on November 9, 2020, of the cervical spine that apparently showed
24 significant bilateral foraminal stenosis the C5-6 level. At this visit, Respondent recommended
25 that she have a posterior foraminotomy at the C5-6 level for symptomatic relief. The laterality of
26 the proposed procedure was not noted in Respondent's encounter note.

27 18. On November 18, 2020, the patient underwent laminoforaminotomy by Respondent.
28 The consent on the day of surgery specified that the procedure was to be "Bilateral cervical

1 5/cervical 6 posterior cervical foraminotomies, transforaminal injections, posteriolateral
2 arthrodesis, iliac crest bone marrow aspiration". Respondent's operative report described left
3 sided C5-6 and C4-5 hemilaminotomies, even though the patient's written informed consent was
4 for bilateral surgery at the C5-6 level only. According to Respondent's surgical note, there were
5 no complications from this procedure and the patient was discharged on the first post operative
6 day.

7 19. Another appointment with Respondent occurred on November 25, 2020. At this visit,
8 Respondent noted that Patient 1 was to start medical marijuana. She was prescribed morphine
9 sulfate. Flexion/extension x-rays were ordered. A new referral was made to physical therapy. A
10 referral was also made to otolaryngology for snoring and throat pain. No examination was noted
11 for this encounter.

12 20. A virtual visit was made by Patient 1 to Respondent's clinic on January 20th, 2021.
13 At this visit, the reason for appointment was stated to be recurrent 3 weeks of right-sided arm
14 pain, numbness and radiculopathy. Patient 1 was referred to have an MRI of the cervical spine.

15 21. On May 18, 2021, Patient 1 returned with continuing complaints of neck and right
16 sided arm pain. Patient 1 reported difficulty with complying with physical therapy due to pain as
17 well as a sunken appearance of her left sided cervical wounds. She was prescribed Voltaren gel
18 and a CT scan of the cervical spine was ordered by Respondent. A physical therapy referral was
19 placed. No further encounters with Respondent were recorded. Patient 1 sought further care
20 elsewhere.

21 22. During the Board's investigation of Patient 1's complaint, the Board's Investigator
22 requested that Respondent appear for an interview to discuss his care and treatment of Patient 1.
23 Respondent did not appear. A Subpoena to Appear was served on Respondent's address of
24 record by certified mail, ordering Respondent to appear for an interview with the Board on March
25 12, 2024. Respondent failed to appear as ordered and did not provide a reason.

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FIRST CAUSE FOR DISCIPLINE

(Gross Negligence)

23. Respondent Larry Teik-Man Khoo, M.D. is subject to disciplinary action under section 2234, subdivision (b), of the Code, in that he was grossly negligent in his care and treatment of Patient 1. The circumstances are as follows:

24. Allegations of paragraphs 9 through 22 are incorporated herein by reference.

7 25. Patient 1's consent for the surgery on November 18, 2020, does not match the
8 procedure performed from the standpoint of laterality and levels operated on. While Respondent
9 documented intraoperative findings that justified not decompressing the right nerve root at C5-6,
10 instead of performing a bilateral operation, there were no such documented intraoperative
11 findings that justified operating on C4-5. Respondent's unconsented extension of the surgery to
12 C4-5 was an extreme departure from the standard of care.

SECOND CAUSE FOR DISCIPLINE

(Record Keeping)

15 26. Respondent Larry Teik-Man Khoo, M.D. is subject to disciplinary action under
16 section 2266 of the Code, in that he failed to keep adequate and accurate medical records in the
17 care and treatment of Patient 1. The circumstances are as follows:

18 27. The allegations of the First Cause for Discipline are incorporated herein by reference.

THIRD CAUSE FOR DISCIPLINE

(Failure to Attend a Board Interview)

21 28. Respondent Larry Teik-Man Khoo, M.D. is subject to disciplinary action under
22 section 2234, subdivision (g), of the Code, in that he failed to attend and participate in
23 an interview by the Board. The circumstances are as follows:

29. The allegations of the First Cause for Discipline are incorporated herein by reference.

ALLEGATIONS PERTAINING TO PETITION TO REVOKE PROBATION

26 30. In a prior disciplinary action before the Medical Board of California, entitled *In the*
27 *Matter of the First Amended Accusation Against Larry Teik-Man Khoo, M.D.*, Case Number 800-
28 2018-049454, the Board issued a Disciplinary Order, revoking Respondent's Physician and

1 Surgeon's Certificate No. A 62896. The revocation was stayed and Respondent was ordered to
2 complete three years of probation while complying with certain terms conditions of probation.
3 The Disciplinary Order³ became effective on March 6, 2023.

4 31. The Disciplinary Order provides that in the event of Respondent's failure to fully
5 comply with any term or condition of Probation, the Board may revoke probation and carry out
6 the portion of the Disciplinary Order that was stayed. Condition 14 of the Disciplinary Order
7 states:

8 Failure to fully comply with any term or condition of probation is a violation of probation. If
9 Respondent violates probation in any respect, the Board, after giving Respondent notice and the
10 opportunity to be heard, may revoke probation and carry out the disciplinary order that was
11 stayed. If an Accusation, or Petition to Revoke Probation, or an Interim Suspension Order is
filed against Respondent during probation, the Board shall have continuing jurisdiction until the
matter is final, and the period of probation shall be extended until the matter is final.

12 **FIRST CAUSE TO REVOKE PROBATION –**
13 **NON-PRACTICE IN EXCESS OF TWO YEARS**

14 32. Respondent's probation is subject to revocation because he violated Condition 12 of
15 the Disciplinary Order, which provides that not practicing medicine, while subject to probation,
16 for a period of two years or more, constitutes a violation of probation.

17 33. Condition 12 of the Disciplinary Order states:

18 **NON-PRACTICE WHILE ON PROBATION.** Respondent shall notify the Board or
19 its designee in writing within 15 calendar days of any periods of non-practice lasting more
20 than 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-
21 practice is defined as any period of time Respondent is not practicing medicine as defined
22 in Business and Professions Code sections 2051 and 2052 for at least 40 hours in a calendar
23 month in direct patient care, clinical activity or teaching, or other activity as approved by
24 the Board. If Respondent resides in California and is considered to be in non-practice,
25 Respondent shall comply with all terms and conditions of probation. All time spent in an
intensive training program which has been approved by the Board or its designee shall not
be considered non-practice and does not relieve Respondent from complying with all the
terms and conditions of probation. Practicing medicine in another state of the United States
or Federal jurisdiction while on probation with the medical licensing authority of that state
or jurisdiction shall not be considered non-practice.

26 A Board-ordered suspension of practice shall not be considered as a period of non-
27 practice. In the event Respondent's period of non-practice while on probation exceeds 18
28 calendar months, Respondent shall successfully complete the Federation of State Medical

³ All further references to the Disciplinary Order herein refer to the Board's Disciplinary Order in Case Number 800-2018-049454, which became effective on March 6, 2023.

1 Boards' Special Purpose Examination, or, at the Board's discretion, a clinical competence
2 assessment program that meets the criteria of Condition 18 of the current version of the
3 Board's "Manual of Model Disciplinary Orders and Disciplinary Guidelines" prior to
4 resuming the practice of medicine.

5 Respondent's period of non-practice while on probation shall not exceed two (2)
6 years.

7 Periods of non-practice will not apply to the reduction of the probationary term.

8 Periods of non-practice for a Respondent residing outside of California will relieve
9 Respondent of the responsibility to comply with the probationary terms and conditions
10 with the exception of this condition and the following terms and conditions of probation:
11 Obey All Laws; General Probation Requirements; Quarterly Declarations; Abstain from the
12 Use of Alcohol and/or Controlled Substances; and Biological Fluid Testing.

13 34. On or about March 8, 2023, Respondent sent an email to the Board's Designee who
14 was serving as his probation monitor, in which he stated that he has been out of state for personal
15 reasons. He informed his probation monitor he will not be able to return to California until after
16 March 18th. During a later intake interview on March 20, 2023, Respondent confirmed that he
17 has not practiced medicine since before the effective date of the Disciplinary Order, March 6,
18 2023. After a phone conversation with the probation monitor on or about April 27, 2023,
19 Respondent wrote a letter that further confirmed that he was not practicing medicine in California
20 and would be away from California "for a minimum of 8 months."

21 35. As of the date of filing of this Accusation and Petition to Revoke Probation,
22 Respondent has not notified the Board of his return to the practice of medicine. As of the date of
23 filing of this Accusation and Petition to Revoke Probation, Respondent has not practiced
24 medicine while on probation for a period in excess of two years, in violation of Condition 12 of
25 the Disciplinary Order.

26 **SECOND CAUSE TO REVOKE PROBATION –**
27 **FAILURE TO SUBMIT QUARTERLY DECLARATIONS**

28 36. Respondent's probation is subject to revocation because he violated Condition 9 of
the Disciplinary Order, which provides that he is required to submit quarterly declarations
informing the Board about his compliance with probation, even during periods of non-practice.

37. Condition 12 of the Disciplinary Order provides, in pertinent part:

38 ...Periods of non-practice for a Respondent residing outside of California will relieve

Respondent of the responsibility to comply with the probationary terms and conditions with the exception of this condition and the following terms and conditions of probation: Obey All Laws; General Probation Requirements; Quarterly Declarations...

38. Condition 9 of the Disciplinary Order provides:

QUARTERLY DECLARATIONS.

Respondent shall submit quarterly declarations under penalty of perjury on forms provided by the Board, stating whether there has been compliance with all the conditions of probation.

Respondent shall submit quarterly declarations not later than 10 calendar days after the end of the preceding quarter.

9 39. Respondent submitted a late Quarterly Declaration on or about May 4, 2023, on
10 which Respondent reported that he has not practiced medicine during the preceding first quarter
11 of 2023. Respondent did not submit a Quarterly Declaration for the second quarter of 2023.
12 Respondent submitted a Quarterly Declaration on or about August 31, 2023, on which he reported
13 that he has not practiced medicine during the third quarter of 2023. Respondent has not submitted
14 any further Quarterly Declarations.

15 40. As of the date of filing of this Accusation and Petition to Revoke Probation, despite
16 numerous reminders sent to the address of record that was designated by him and to the email
17 address that Respondent previously used to communicate with his probation monitor, Respondent
18 has not submitted Quarterly Declarations for the second and fourth quarters of 2023, or for any
19 quarters of 2024, in violation of Condition 9 of the Disciplinary Order.

THIRD CAUSE TO REVOKE PROBATION –
FAILURE TO ABIDE BY GENERAL PROBATION REQUIREMENTS

22 41. Respondent's probation is subject to revocation because he violated Condition 10 of
23 the Disciplinary Order, which provides that he is required to keep the Board apprised of his
24 whereabouts and contact information, even during the period of non-practice.

42. Condition 12 of the Disciplinary Order provides:

26 ...Periods of non-practice for a Respondent residing outside of California will relieve
27 Respondent of the responsibility to comply with the probationary terms and conditions
28 with the exception of this condition and the following terms and conditions of probation:
Obey All Laws; General Probation Requirements; Quarterly Declarations...

1 43. Condition 10 of the Disciplinary Order provides:

2 GENERAL PROBATION REQUIREMENTS.

3 Compliance with Probation Unit

4 Respondent shall comply with the Board's probation unit.

5 Address Changes

6 Respondent shall, at all times, keep the Board informed of Respondent's business and
7 residence addresses, email address (if available), and telephone number. Changes of such
8 addresses shall be immediately communicated in writing to the Board or its designee.
Under no circumstances shall a post office box serve as an address of record, except as
allowed by Business and Professions Code section 2021, subdivision (b).

9 Place of Practice

10 Respondent shall not engage in the practice of medicine in Respondent's or patient's
place of residence, unless the patient resides in a skilled nursing facility or other similar
licensed facility.

11 License Renewal

12 Respondent shall maintain a current and renewed California physician's and surgeon's
13 license.

14 Travel or Residence Outside California

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

16 In the event Respondent should leave the State of California to reside or to practice
17 Respondent shall notify the Board or its designee in writing 30 calendar days prior to the
dates of departure and return.

19 44. During the entire period of probation starting on March 6, 2023, Respondent has
20 maintained an address of record which is a private mail box rental location. Respondent has not
21 complied with Business and Professions Code section 2021, subdivision (b) by providing the
22 Board with his current street address, email and phone number to enable the Board or its designee
23 to communicate directly with Respondent.

24 45. At no time during his period of probation, starting on March 6, 2023, did Respondent
25 inform the Board or its designee of a change of his address or email address. He did not respond
26 to email communications sent to the email address Respondent previously used to communicate
27 with his probation monitor.

28 ///

DISCIPLINARY CONSIDERATIONS

2 46. To determine the degree of discipline, if any, to be imposed on Respondent Larry
3 Teik-Man Khoo, M.D., Complainant alleges that on or about August 17, 2016, in a prior
4 disciplinary action titled *In the Matter of the Second Amended Accusation Against Larry Teik-*
5 *Man Khoo, MD.*, before the Medical Board of California, in Case Number 17-2010-208820,
6 Respondent's license was issued a Public Reprimand and he was required to complete a Medical
7 Record Keeping Course as well as Education Course of 16 hours. That Accusation was based
8 upon allegations of Gross Negligence, Repeated Negligent Acts and Inadequate and Inaccurate
9 Record Keeping in the care and treatment of two patients. That decision is now final and is
10 incorporated by reference as if fully set forth herein.

11 47. To further determine the degree of discipline, if any, to be imposed on Respondent
12 Larry Teik-Man Khoo, M.D., Complainant alleges that on or about March 6, 2023, in a prior
13 disciplinary action titled *In the Matter of the First Amended Accusation Against Larry Teik-Man*
14 *Khoo, MD.*, before the Medical Board of California, in Case Number 800-2018-049454,
15 Respondent's license was revoked, but the revocation was stayed and Respondent's license was
16 placed on probation in connection with allegations of Gross Negligence, Repeated Negligent Acts
17 and Inadequate and Inaccurate Record Keeping in the care and treatment of one patient.
18 Respondent was required to complete a Clinical Competence Assessment Program, a Medical
19 Records Keeping Course, an Ethics Course, and to install a Practice Monitor. That decision is
20 now final and is incorporated by reference as if fully set forth herein. Due to Respondent's non-
21 practice while on probation, he has not completed any of the remedial or educational probation
22 requirements ordered by the Board.

PRAYER

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

26 1. Revoking or suspending Physician's and Surgeon's Certificate Number A 62896,
27 issued to Respondent Larry Teik-Man Khoo, M.D.;

1 2. Revoking the probation and imposing discipline that was stayed in case number 800-
2 2018-049454, a revocation of Physician's and Surgeon's Certificate Number A 62896,
3 issued to Respondent Larry Teik-Man Khoo, M.D.;

4 3. Revoking, suspending or denying approval of Respondent Larry Teik-Man Khoo,
5 M.D.'s authority to supervise physician assistants and advanced practice nurses;

6 4. Ordering Respondent Larry Teik-Man Khoo, M.D., to pay the Board the costs of the
7 investigation and enforcement of this case, and if placed on probation, the costs of
8 probation monitoring; and

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

10
11
12 DATED: MAR 20 2025


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

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