

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

In the Matter of the Accusation Against:

Pedro Enrique Huertas, M.D.

**Physician's & Surgeon's Certificate
No. G 174099**

Case No. 800-2023-103521

Respondent.

DECISION

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

This Decision shall become effective at 5:00 p.m. on January 2, 2026.

IT IS SO ORDERED: December 3, 2025.

MEDICAL BOARD OF CALIFORNIA

 **M.D.**

**Veling Tsai, M.D., Vice Chair
Panel A**

1 ROB BONTA
Attorney General of California
2 EDWARD KIM
Supervising Deputy Attorney General
3 TRINA L. SAUNDERS
Deputy Attorney General
4 State Bar No. 207764
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6516
6 Facsimile: (916) 731-2117
E-mail: Trina.Saunders@doj.ca.gov
7 *Attorneys for Complainant*

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

11 In the Matter of the First Amended Accusation
Against:

12 **PEDRO ENRIQUE HUERTAS, M.D.**
13 **1008 Linda Glen Drive**
Pasadena, CA 91105-1118

14 **Physician's and Surgeon's Certificate No. G**
15 **174099,**

16 Respondent.
17

Case No. 800-2023-103521

OAH No. 2024090933

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

18
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
20 entitled proceedings that the following matters are true:

21 **PARTIES**

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

26 2. Respondent Pedro Enrique Huertas, M.D. (Respondent) is represented in this
27 proceeding by attorney Gillian E. Friedman, whose address is 2121 Avenue of the Stars, Suite
28 800, Los Angeles, California 90067-5080.

3. On or about July 26, 2021, the Board issued Physician's and Surgeon's Certificate No. G 174099 to Respondent. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in First Amended Accusation No. 800-2023-103521, and will expire on July 31, 2025, unless renewed.

JURISDICTION

4. First Amended Accusation No. 800-2023-103521 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 August 7, 2024. Respondent timely filed his Notice of Defense contesting the Accusation.

5. A copy of First Amended Accusation No. 800-2023-103521 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 First Amended Accusation No. 800-2023-103521. 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 First Amended 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.

CULPABILITY

9. Respondent understands and agrees that the charges and allegations in First Amended Accusation No. 800-2023-103521, if proven at a hearing, constitute cause for imposing discipline

1 upon his Physician's and Surgeon's Certificate.

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

5 11. Respondent does not contest that, at an administrative hearing, Complainant could
6 establish a prima facie case with respect to the charges and allegations in First Amended
7 Accusation No. 800-2023-103521, a true and correct copy of which is attached hereto as Exhibit
8 A, and that he has thereby subjected his Physician's and Surgeon's Certificate No. G 174099 to
9 disciplinary action.

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

13 CONTINGENCY

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

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

27 15. Respondent agrees that if an accusation is filed against him before the Board, all of
28 the charges and allegations contained in First Amended Accusation No. 800-2023-103521 shall

1 be deemed true, correct and fully admitted by Respondent for purposes of any such proceeding or
2 any other licensing proceeding involving Respondent in the State of California.

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

6 17. In consideration of the foregoing admissions and stipulations, the parties agree that
7 the Board may, without further notice or opportunity to be heard by the Respondent, issue and
8 enter the following Disciplinary Order.

9
10 **DISCIPLINARY ORDER**

11 **IT IS HEREBY ORDERED THAT** Physician's and Surgeon's Certificate No. G 174099
12 issued to Respondent Pedro Enrique Huertas, M.D., shall be and is hereby Publicly Reprimanded
13 pursuant to California Business and Professions Code section 2227, subdivision (a)(4). This
14 Public Reprimand is issued in connection with the conviction of a crime, as set forth in First
15 Amended Accusation No. 800-2023-103521, and is as follows:

16 A. **PUBLIC REPRIMAND.**

17 "On October 17, 2023, you were arraigned and plead guilty in the United States District
18 Court for the District of Vermont, to one criminal misdemeanor count of 'Knowingly Imported or
19 Attempted to Import Carvings made from Sperm Whale Teeth and a Walrus Tusk' for your
20 actions taken on or about July 25, 2021. You were convicted and sentenced to time served and
21 ordered to pay a \$50,000.00 fine for said crime. The details surrounding the crime and conviction
22 are more fully described in First Amended Accusation No. 800-2023-103521."

23 B. **INVESTIGATION/ENFORCEMENT COST RECOVERY.** Within 60 calendar
24 days of the effective date of this Decision, Respondent is hereby ordered to reimburse the Board
25 its cost of investigation and enforcement, including, but not limited to expert review, accusations,
26 and legal reviews, in the amount of \$12,571.38 (twelve thousand, five hundred seventy-one
27 dollars and thirty-eight cents).

28 Costs shall be payable to the Medical Board of California. Payment must be made in full

1 within 60 calendar days of the effective date of the Order, or by a payment plan approved by the
2 Medical Board of California. Any and all requests for a payment plan shall be submitted in
3 writing by Respondent to the Board. Failure to comply with the payment plan shall be considered
4 unprofessional conduct.

5 The filing of bankruptcy by Respondent shall not relieve Respondent of the responsibility
6 to repay investigation and enforcement costs.

7 C. ENFORCEMENT. Any failure to fully comply with the terms of this Disciplinary
8 Order shall constitute unprofessional conduct and will subject Respondent's Physician's and
9 Surgeon's Certificate to further disciplinary action.

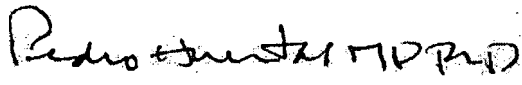
10 D. FUTURE ADMISSIONS CLAUSE.

11 If Respondent should ever apply or reapply for a new license or certification, or petition
12 for reinstatement of a license, by any other health care licensing action agency in the State of
13 California, all of the charges and allegations contained in First Amended Accusation No. 800-
14 2023-103521 shall be deemed to be true, correct, and admitted by Respondent for the purpose of
15 any Statement of Issues or any other proceeding seeking to deny or restrict license.

16
17 ACCEPTANCE

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

23
24 DATED: 25 June 2025



PEDRO ENRIQUE HUERTAS, M.D.
Respondent

1 I have read and fully discussed with Respondent Pedro Enrique Huertas, M.D. the terms
2 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
3 Order. I approve its form and content.

4
5 DATED: June 26, 2025

Gillian Friedman
6 GILLIAN E. FRIEDMAN
7 *Attorney for Respondent*

8 **ENDORSEMENT**

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

11 DATED: June 27, 2025

12 Respectfully submitted,

13 ROB BONTA
14 Attorney General of California
15 EDWARD KIM
16 Supervising Deputy Attorney General

17 *Trina L. Saunders*
18 TRINA L. SAUNDERS
19 Deputy Attorney General
20 *Attorneys for Complainant*

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22 Stip Settlement and Disc Order - MBC-Osteopathic.docx
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27
28

Exhibit A

First Amended Accusation No. 800-2023-103521

1 ROB BONTA
Attorney General of California
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Attorneys for Complainant
7

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

11 In the Matter of the First Amended Accusation | Case No. 800-2023-103521
Against:

12 **A C C U S A T I O N**

12 **Pedro Enrique Huertas, M.D.**
13 **1008 Linda Glen Drive**
14 **Pasadena, CA 91105-1118**

14 **Physician's and Surgeon's Certificate**
15 **No. G 174099,**

16 Respondent.
17

18 **PARTIES**

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

22 2. On or about July 26, 2021, the Board issued Physician's and Surgeon's Certificate
23 Number G 174099 to Pedro Enrique Huertas, M.D. (Respondent). The Physician's and Surgeon's
24 Certificate was in full force and effect at all times relevant to the charges brought herein and will
25 expire on July 31, 2025, unless renewed.

26 **JURISDICTION**

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

1 unless otherwise indicated.

2 4. Section 2227 of the Code states:

3 (a) A licensee whose matter has been heard by an administrative law judge of
4 the Medical Quality Hearing Panel as designated in Section 11371 of the Government
5 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:

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

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

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

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

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

14 ...

15 STATUTORY PROVISIONS

16 5. Section 2234 of the Code states:

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

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

21 (b) Gross negligence.

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

24 (1) An initial negligent diagnosis followed by an act or omission medically
25 appropriate for that negligent diagnosis of the patient shall constitute a single
negligent act.

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

1 (d) Incompetence.

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

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

6 (g) The failure by a certificate holder, in the absence of good cause, to attend
7 and participate in an interview by the board no later than 30 calendar days after being
8 notified by the board. This subdivision shall only apply to a certificate holder who is
9 the subject of an investigation by the board.

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

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

16 6. Unprofessional conduct under Code section 2234 is conduct which breaches the rules
17 or ethical code of the medical profession, or conduct which is unbecoming a member in good
18 standing of the medical profession, and which demonstrates an unfitness to practice medicine.
19 (*Shea v. Board of Medical Examiners* (1978) 81 Cal.App.3d 564, 575.)

20 7. Section 2236 of the Code states:

21 (a) The conviction of any offense substantially related to the qualifications,
22 functions, or duties of a physician and surgeon constitutes unprofessional conduct
23 within the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record
24 of conviction shall be conclusive evidence only of the fact that the conviction
25 occurred.

26 (b) The district attorney, city attorney, or other prosecuting agency shall notify
27 the Medical Board of the pendency of an action against a licensee charging a felony
28 or misdemeanor immediately upon obtaining information that the defendant is a
licensee. The notice shall identify the licensee and describe the crimes charged and
the facts alleged. The prosecuting agency shall also notify the clerk of the court in
which the action is pending that the defendant is a licensee, and the clerk shall record
prominently in the file that the defendant holds a license as a physician and surgeon.

(c) The clerk of the court in which a licensee is convicted of a crime shall,
within 48 hours after the conviction, transmit a certified copy of the record of
conviction to the board. The division may inquire into the circumstances surrounding
the commission of a crime in order to fix the degree of discipline or to determine if
the conviction is of an offense substantially related to the qualifications, functions, or
duties of a physician and surgeon.

(d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is
deemed to be a conviction within the meaning of this section and Section 2236.1.
The record of conviction shall be conclusive evidence of the fact that the conviction
occurred.

1 8. Section 2236.1 of the Code states, in pertinent part:

2 ...

3 (b) Upon receipt of the certified copy of the record of conviction, if after a
4 hearing it is determined therefrom that the felony of which the licensee was convicted
5 was substantially related to the qualifications, functions, or duties of a physician and
6 surgeon, the Medical Board shall suspend the license until the time for appeal has
7 elapsed, if no appeal has been taken, or until the judgment of conviction has been
8 affirmed on appeal or has otherwise become final, and until further order of the
9 division. The issue of substantial relationship shall be heard by an administrative
10 law judge from the Medical Quality Hearing Panel sitting alone or with a panel of the
11 division, in the discretion of the division.

12 (c) Notwithstanding subdivision (b), a conviction of any crime referred to in
13 Section 2237, or a conviction of Section 187, 261, 288, or former Section 262, of the
14 Penal Code, shall be conclusively presumed to be substantially related to the
15 qualifications, functions, or duties of a physician and surgeon and no hearing shall be
16 held on this issue. Upon its own motion or for good cause shown, the board may
17 decline to impose or may set aside the suspension when it appears to be in the interest
18 of justice to do so, with due regard to maintaining the integrity of and confidence in
19 the medical profession.

20 (d) (1) Discipline may be ordered in accordance with Section 2227, or the
21 Medical Board may order the denial of the license when the time for appeal has
22 elapsed, the judgment of conviction has been affirmed on appeal, or an order granting
23 probation is made suspending the imposition of sentence, irrespective of a subsequent
24 order under Section 1203.4 of the Penal Code allowing the person to withdraw the
25 plea of guilty and to enter a plea of not guilty, setting aside the verdict of guilty, or
26 dismissing the accusation, complaint, information, or indictment.

27 (2) The issue of penalty shall be heard by an administrative law judge from the
28 Medical Quality Hearing Panel sitting alone or with a panel of the board, in the
29 discretion of the board. The hearing shall not be had until the judgment of conviction
30 has become final or, irrespective of a subsequent order under Section 1203.4 of the
31 Penal Code, an order granting probation has been made suspending the imposition of
32 sentence; except that a licensee may, at the licensee's option, elect to have the issue
33 of penalty decided before those time periods have elapsed. Where the licensee so
34 elects, the issue of penalty shall be heard in the manner described in this section at the
35 hearing to determine whether the conviction was substantially related to the
36 qualifications, functions, or duties of a physician and surgeon. If the conviction of a
37 licensee who has made this election is overturned on appeal, any discipline ordered
38 pursuant to this section shall automatically cease. Nothing in this subdivision shall
39 prohibit the division from pursuing disciplinary action based on any cause other than
40 the overturned conviction.

41 (e) The record of the proceedings resulting in the conviction, including a
42 transcript of the testimony therein, may be received in evidence.

43 (f) The other provisions of this article setting forth a procedure for the
44 suspension or revocation of a physician and surgeon's certificate shall not apply to
45 proceedings conducted pursuant to this section.

1 **REGULATORY PROVISIONS**

2 9. California Code of Regulations, title 16, section 1360, states:

3 (a) For the purposes of denial, suspension or revocation of a license pursuant to
4 Section 141 or Division 1.5 (commencing with Section 475) of the code, a crime,
5 professional misconduct, or act shall be considered to be substantially related to the
6 qualifications, functions or duties of a person holding a license if to a substantial
7 degree it evidences present or potential unfitness of a person holding a license to
8 perform the functions authorized by the license in a manner consistent with the public
9 health, safety or welfare. Such crimes, professional misconduct, or acts shall include
10 but not be limited to the following: Violating or attempting to violate, directly or
11 indirectly, or assisting in or abetting the violation of, or conspiring to violate any
12 provision of state or federal law governing the applicant's or licensee's professional
13 practice.

14 (b) In making the substantial relationship determination required under subdivision (a) for
15 a crime, the board shall consider the following criteria:

- 16 (1) The nature and gravity of the crime;
17 (2) The number of years elapsed since the date of the crime; and
18 (3) The nature and duties of the profession.

19 **COST RECOVERY**

20 10. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
21 administrative law judge to direct a licensee found to have committed a violation or violations of
22 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
23 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
24 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
25 included in a stipulated settlement.

26 **FACTUAL ALLEGATIONS**

27 11. At times relevant to this Accusation: (a) Sperm Whales (*Physeter macrocephalus*)
28 were protected and regulated under the Endangered Species Act and under the Marine Mammal
Protection Act, and Sperm Whales were also protected under Appendix One of the Convention on
International Trade in Endangered Species of Wild Fauna and Flora ("CITES"); (b) Walrus
(*Odobenus rosmarus*) were protected under the Marine Mammal Protection Act and Appendix III
of CITES; (c) Sperm Whale parts, such as teeth, and Walrus parts, such as tusks, were also
protected and regulated; and (d) in order to import Sperm Whale teeth and Walrus tusks into the

1 United States, certain import and export permits were required to be obtained.

2 12. On or about July 25, 2021, Respondent arrived at the Highgate Springs, Vermont Port
3 of Entry from Quebec, Canada with nine statues in the trunk of his vehicle. Five of the statues
4 were made of stone, three of the statues were carvings made of Sperm Whale teeth, and one statue
5 was a carving made out of a Walrus Tusk. When asked by the Customs and Border Protection
6 (CBP) Officer what he was bringing back from Canada, Respondent replied only one stone statue.
7 The CBP Officer then inspected the trunk and observed multiple bubble wrapped packages
8 containing nine statues. Upon further questioning, Respondent acknowledged that four of the
9 statues were made of "ivory," and then said "walrus tusk." Respondent knew at this time that the
10 carvings were made from parts of marine mammals which were regulated under federal law.

11 13. A search of records at the U.S. Fish and Wildlife Service's ("FWS") Division of
12 Management Authority and the Canadian agency of Wildlife Management and Regulatory Affairs
13 revealed no records indicating that Respondent applied for or received any permits, certificates, or
14 letters of authorization to transport into the United States the Sperm Whale teeth and Walrus tusk
15 carvings.

16 14. On or about August 24, 2023, in the matter of *United States of America v. Pedro*
17 *Huertas*, United States District Court, District of Vermont case number 2:23-CR-000104-1,
18 Respondent was charged with violating 50 C.F.R. § 224.102; 16 U.S.C. §§ 1538(a)(1)(A);
19 1540(b)(1); 18 U.S.C. § 2 (Knowingly imported into the United States, without a permit, parts of
20 an endangered species; that is, carvings made from Sperm Whale teeth); and 50 C.F.R. §§
21 23.13(a), 23.20(e); 16 U.S.C. §§ 1538(c)(1), 1540(b)(1); 18 U.S.C. § 2; 16 U.S.C. §
22 3372(a)(1) (Knowingly imported into the United States, without the required documentation,
23 carvings made from Sperm whale teeth, listed under Appendix I of the Convention on
24 International Trade in Endangered Species of Wild Fauna and Flora ("CITES"), and a carving
25 made from a Walrus tusk listed under Appendix III of CITES).

26 15. On or about October 19, 2023, in the matter of *United States of America v. Pedro*
27 *Huertas*, United States District Court, District of Vermont, case number 2:23-CR-000104-1,
28 following a plea of guilty, Respondent was convicted of one count of violating 16 U.S.C. §§

1 3372(a)(1), 3373(d)(2)(knowingly importing or attempting to import carvings made from Sperm
2 Whale teeth and a Walrus tusk).

3 16. On or about October 19, 2023, in the matter of *United States of America v. Pedro*
4 *Huertas*, United States District Court, District of Vermont, case number 2:23-CR-000104-1, a
5 judgement was entered against Respondent wherein he was sentenced to time served and ordered
6 to pay a fine of \$50,000.00 and an assessment of \$25.00, which were satisfied on or about
7 November 3, 2023.

8 17. On or about June 18, 2024, during the Board's investigation of the circumstances
9 surrounding Respondent's conviction, Respondent was interviewed by the Board's investigators.
10 During the interview, Respondent admitted that he asked the owner of an art gallery in Montreal,
11 Canada, I.M., to backdate a certificate of authenticity pertaining to one of the carvings at issue in
12 the criminal case, to falsely show that the carving was created prior to the effective date of the
13 statute he was alleged to have violated in the criminal matter.

14 **FIRST CAUSE FOR DISCIPLINE**

15 **(Conviction of a Crime)**

16 18. Respondent Pedro Enrique Huertas, M.D. is subject to disciplinary action under
17 section 2236 of the Code, in that he has been convicted of a crime substantially related to the
18 qualifications, functions, or duties of a physician and surgeon, as more particularly alleged herein.
19 The facts and circumstances are set forth in paragraphs 11 through 17, inclusive, which are
20 incorporated by reference as if fully set forth herein.

21 **SECOND CAUSE FOR DISCIPLINE**

22 **(Dishonest and/or Corrupt Acts)**

23 19. Respondent Pedro Enrique Huertas, M.D. is subject to disciplinary action under
24 section 2234, subdivision (e), of the Code, in that he has engaged in dishonest and/or corrupt acts
25 substantially related to the qualifications, functions, or duties of a physician and surgeon, as more
26 particularly alleged in the First Cause for Discipline above, which is hereby incorporated by
27 reference and realleged as if fully set forth herein.

1 **THIRD CAUSE FOR DISCIPLINE**

2 **(General Unprofessional Conduct)**

3 20. Respondent Pedro Enrique Huertas, M.D. is subject to disciplinary action under
4 section 2234 of the Code, in that he has engaged in conduct which breaches the rules or ethical
5 code of the medical profession, or conduct which is unbecoming to a member in good standing of
6 the medical profession, and which demonstrates an unfitness to practice medicine, as more
7 particularly alleged in the First Cause for Discipline above, which is hereby incorporated by
8 reference and realleged as if fully set forth herein.

9 **PRAYER**

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

12 1. Revoking or suspending Physician's and Surgeon's Certificate Number G 174099,
13 issued to Respondent Pedro Enrique Huertas, M.D.;

14 2. Revoking, suspending or denying approval of Respondent Pedro Enrique Huertas,
15 M.D.'s authority to supervise physician assistants and advanced practice nurses;

16 3. Ordering Respondent Pedro Enrique Huertas, M.D., to pay the Board the costs of the
17 investigation and enforcement of this case, and if placed on probation, the costs of probation
18 monitoring; and

19 4. Taking such other and further action as deemed necessary and proper.

20
21 DATED: JUN 25 2025

Sharlene Smith For

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

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