

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

In the Matter of the Accusation )  
against: )  
 )  
SUSAN MARGARET RYAN, D.P.M. )  
 )  
Podiatrist License No. E-4738 )  
 )  
 )  
 )  
 )  
Respondent )

File No: 500-2018-000786

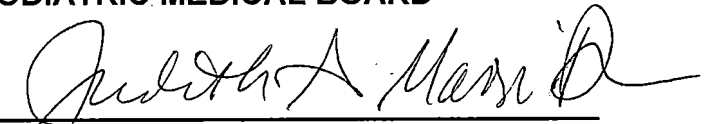
DECISION AND ORDER

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

This Decision shall become effective at 5:00 p.m. on MAY 28 2021

IT IS SO ORDERED APR 29 2021

PODIATRIC MEDICAL BOARD

  
\_\_\_\_\_  
Judith Manzi, D.P.M., President

1 XAVIER BECERRA  
Attorney General of California  
2 STEVEN D. MUNI  
Supervising Deputy Attorney General  
3 VERONICA VO  
Deputy Attorney General  
4 State Bar No. 230698  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 210-7508  
Facsimile: (916) 327-2247  
7

8 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:

14 **SUSAN MARGARET RYAN, D.P.M.**  
15 **3250 Fortune Court**  
**Auburn, CA 95602**

16 **Podiatrist License No. E-4738**

17 Respondent.

Case No. 500-2018-000786

OAH No. 2020080080

**AMENDED 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. Brian Naslund (Complainant) is the Executive Officer of the Podiatric Medical Board  
23 (Board). He brought this action solely in his official capacity and is represented in this matter by  
24 Xavier Becerra, Attorney General of the State of California, by Veronica Vo, Deputy Attorney  
25 General.

26 2. Respondent Susan Margaret Ryan, D.P.M. (Respondent) is represented in this  
27 proceeding by attorney Mark R. Gibson, Esq., whose address is: 1100 Larkspur Landing Circle,  
28 Suite 350, Larkspur, CA 94939.



1 10. For the purpose of resolving the Accusation without the expense and uncertainty of  
2 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a *prima*  
3 *facie* case with respect to the charges and allegations in paragraph 23, subdivision (a) and (g)  
4 contained in Accusation No. 500-2018-000786, a true and correct copy of which is attached as  
5 Exhibit A, and that she has thereby subjected her Podiatrist License No. E-4738 to disciplinary  
6 action. Respondent hereby gives up her right to contest that cause for discipline exists based on  
7 those charges.

8 11. Respondent agrees that her Podiatrist License No. E-4738 is subject to discipline and  
9 she agrees to be bound by the Board's terms as set forth in the Disciplinary Order below.  
10 Respondent further understands and acknowledges that failure to complete the Board's terms as  
11 set forth below may lead to additional charges alleging unprofessional conduct and the imposition  
12 of additional discipline.

13 12. Respondent agrees and understands that pursuant to Business and Professions Code  
14 section 2497.5, she is responsible for the costs of the investigation and enforcement of this case.  
15 Respondent shall pay the Podiatric Medical Board the sum of \$15,649.00, payable within thirty-  
16 six (36) months of the effective date of the Decision.

#### 17 RESERVATION

18 13. The admission made by Respondent herein are only for the purposes of this  
19 proceeding, or any other proceedings in which the Podiatric Medical Board or other professional  
20 licensing agency is involved, and shall not be admissible in any other criminal or civil  
21 proceeding.

#### 22 CONTINGENCY

23 14. This stipulation shall be subject to approval by the Podiatric Medical Board.  
24 Respondent understands and agrees that counsel for Complainant and the staff of the Podiatric  
25 Medical Board may communicate directly with the Board regarding this stipulation and  
26 settlement, without notice to or participation by Respondent or her counsel. By signing the  
27 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek  
28 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails

1 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary  
2 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal  
3 action between the parties, and the Board shall not be disqualified from further action by having  
4 considered this matter.

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

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

11 **DISCIPLINARY ORDER**

12 **A. PUBLIC REPRIMAND**

13 IT IS HEREBY ORDERED that Respondent Susan Margaret Ryan, D.P.M., as a holder of  
14 Podiatrist License No. E-4738, shall be and hereby is Publicly Reprimanded pursuant to  
15 California Business and Professions Code section 2227, subdivision (a), subsection (4). This  
16 Public Reprimand, which is issued in connection with Respondent's care and treatment of Patient  
17 A, as set forth in Accusation No. 500-2018-000786, is as follows:

18 "In her care and treatment of Patient A, Respondent used an improper billing code to pay  
19 for non-billable treatment and failed to modify a progress note from one visit to another"

20 **B. COST RECOVERY**

21 Respondent shall pay \$15,649.00 to the Podiatric Medical Board for the costs of the  
22 investigation and enforcement of this case, pursuant to Business and Professions Code section  
23 2497.5. Respondent shall pay this amount within thirty-six (36) months of the effective date of  
24 the Decision. The filing of bankruptcy of period of non-practice by Respondent shall not relieve  
25 the Respondent of her obligation to reimburse the Board for its costs.

26 Failure to pay within the provided time shall constitute general unprofessional conduct and  
27 may serve as the grounds for further disciplinary action.

28 ///

1 **C. FAILURE TO COMPLY**

2 Any failure by Respondent to comply with the terms and conditions of the Disciplinary  
3 Order set forth above shall constitute unprofessional conduct and grounds for further disciplinary  
4 action.

5 **ACCEPTANCE**

6 I have carefully read the above Amended Stipulated Settlement and Disciplinary Order and  
7 have fully discussed it with my attorney, Mark R. Gibson Esq. I understand the stipulation and the  
8 effect it will have on my Podiatrist License. I enter into this Amended Stipulated Settlement and  
9 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
10 Decision and Order of the Podiatric Medical Board.

11  
12 DATED: 4/21/21

  
\_\_\_\_\_  
SUSAN MARGARET RYAN, D.P.M.  
Respondent

13  
14  
15 I have read and fully discussed with Respondent Susan Margaret Ryan, D.P.M. the terms  
16 and conditions and other matters contained in the above Amended Stipulated Settlement and  
17 Disciplinary Order. I approve its form and content.

18 DATED: 4/14/2021

  
\_\_\_\_\_  
MARK R. GIBSON ESQ.  
Attorney for Respondent

19  
20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

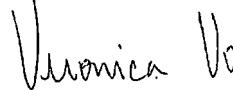
**ENDORSEMENT**

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

DATED: April 22, 2021

Respectfully submitted,

XAVIER BECERRA  
Attorney General of California  
STEVEN D. MUNI  
Supervising Deputy Attorney General



VERONICA VO  
Deputy Attorney General  
*Attorneys for Complainant*

SA2020101146  
34992848.docx

**Exhibit A**

**Accusation No. 500-2018-000786**



1 XAVIER BECERRA  
Attorney General of California  
2 ALEXANDRA M. ALVAREZ  
Supervising Deputy Attorney General  
3 VERONICA VO  
Deputy Attorney General  
4 State Bar No. 230698  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 210-7508  
Facsimile: (916) 327-2247  
7

8 *Attorneys for Complainant*

9

10

11

12

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

13

In the Matter of the Accusation Against:

Case No. 500-2018-000786

14

SUSAN MARGARET RYAN, D.P.M.  
3250 Fortune Court  
15 Auburn, CA 95602

ACCUSATION

16

Podiatrist License No. E4738

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.

23

2. On or about July 12, 2007, the Podiatric Medical Board issued Podiatrist License No.  
24 E4738 to Susan Margaret Ryan, DPM (Respondent). The Podiatrist License was in full force and  
25 effect at all times relevant to the charges brought herein and will expire on June 30, 2021, unless  
26 renewed.

27

///

28

///

1 JURISDICTION

2 3. This Accusation is brought before the Podiatric Medical Board (Board), Department  
3 of Consumer Affairs, under the authority of the following laws. All section references are to the  
4 Business and Professions Code (Code) unless otherwise indicated.

5 4. Section 2222 of the Code states:

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

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

21 5. Section 2497 of the Code states:

22 "(a) The board may order the denial of an application for, or the suspension of, or the  
23 revocation of, or the imposition of probationary conditions upon, a certificate to practice  
24 podiatric medicine for any of the causes set forth in Article 12 (commencing with section  
25 2220) in accordance with Section 2222.

26 "(b) The board may hear all matters, including but not limited to, any contested case  
27 or may assign any such matters, to an administrative law judge. The proceedings shall be  
28 held in accordance with Section 2230. If a contested case is heard by the board itself, the

1 administrative law judge who presided at the hearing shall be present during the board's  
2 consideration of the case and shall assist and advise the board."

3 6. Section 2234 of the Code states, in pertinent part:

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

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

9 "(b) Gross negligence.

10 "(c) Repeated negligent acts. To be repeated, there must be two or more negligent  
11 acts or omissions. An initial negligent act or omission followed by a separate and distinct  
12 departure from the applicable standard of care shall constitute repeated negligent acts.

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

15 (2) When the standard of care requires a change in the diagnosis, act, or omission  
16 that constitutes the negligent act described in paragraph (1), including, but not limited to, a  
17 reevaluation of the diagnosis or a change in treatment, and the licensee's conduct departs  
18 from the applicable standard of care, each departure constitutes a separate and distinct  
19 breach of the standard of care.

20 "...

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

22 "..."

23 7. Unprofessional conduct under Business and Professions Code section 2234 is conduct  
24 which breaches the rules or ethical code of the medical profession, or conduct which is  
25 unbecoming to a member in good standing of the medical profession, and which demonstrates an  
26 unfitness to practice medicine. (*Shea v. Board of Medical Examiners* (1978) 81 Cal.App.3d 546,  
27 575.)

28 ///

1 8. Section 2266 of the Code states:

2 "The failure of a physician and surgeon to maintain adequate and accurate records  
3 relating to the provision of services to their patients constitutes unprofessional conduct."

4 COST RECOVERY

5 9. Section 2497.5 of the Code states:

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

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

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

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

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

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

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

1 FACTUAL ALLEGATIONS

2 10. Respondent is a podiatrist in Daly City, California. On or about July 13, 2017, Patient  
3 A<sup>1</sup> saw Respondent for a consultation regarding a painful bunion, her right foot worse than her  
4 left, as well as numbness to the great right toe. During this consultation, Respondent conducted a  
5 physical examination with Patient A, but did not notate Patient A's vitals. At this appointment,  
6 Respondent also viewed x-rays taken by another doctor. After the examination, Respondent  
7 discussed surgical and conservative options to ease Patient A's pain. One of the conservative  
8 options consisted of wearing orthotics. Patient A planned to get authorization for orthotics to be  
9 casted on the return office visit.

10 11. On or about November 2, 2017, Patient A returned to Respondent's office with an  
11 over-the-counter orthotic she brought in for modification. The medical notes in this entry were the  
12 exact same as the ones entered on July 13, 2007, with the exception of two additional sentences.  
13 The two sentences read as follows: "She returns to the office with over-the-counter orthotics for  
14 modification as her insurance does not pay for custom orthotics" and "orthotics modified medial  
15 intrinsic heel 1/8 inch felt, reverse Morton's extension bilateral. Return to the office if no  
16 improvement or if condition worsens." Though it was clear this appointment was dedicated to  
17 modifying Patient A's orthotics, Patient A's insurance was charged for strapping of the foot or  
18 ankle.

19 12. On or about February 8, 2018, Patient A returned to Respondent's office. The reason  
20 for this visit was unclear since the medical note for the visit was copied verbatim from the  
21 medical note dated November 2, 2017.

22 13. On or about May 17, 2018, Patient A returned to Respondent's office for a re-  
23 evaluation of the pain to her right and left big toes. The medical notes indicate that Respondent  
24 discussed surgical options at this point. Respondent went over a full-page surgical consent and  
25 postoperative care plan. Respondent discussed the risks associated with surgery, including the  
26 use of anesthesia. Respondent explained that even after surgery, Patient A would still need

27 \_\_\_\_\_  
28 <sup>1</sup> To protect the privacy of the patient involved, the patient name has not been included in  
this pleading. Respondent is aware of the identity of the patient referred herein.

1 custom orthotics to minimize the biomechanical issues that were the cause of Patient A's pain.  
2 Respondent answered Patient A's many questions about the surgical procedure. Ultimately,  
3 Respondent advised Patient A that unless she had significant pain, the risks of surgery did not  
4 outweigh the benefits. Though Respondent recommended custom orthotics, Patient A declined.

5 14. On or about August 7, 2018, Patient A returned to Respondent's office with a  
6 complaint of a painful deformity to the great toe region. Patient A did not respond to prior  
7 conservative measures that included rest, orthotics, stiff-soled shoes and modifications to daily  
8 activity. Respondent gave Patient A two options for surgery: a metatarsal ostectomy<sup>2</sup> and an  
9 exostectomy.<sup>3</sup> Ultimately, Respondent recommended an exostectomy due to the fact that Patient  
10 A only complained of pain at the end of range of motion of her toe. Respondent provided Patient  
11 A with details of the surgery, expected outcomes, and risks and benefits of the surgery.  
12 Respondent also provided post-operation instructions. Respondent conducted a full examination  
13 of Patient A's feet.

14 15. On or about August 15, 2018, Patient A had surgery. There is a dated and timed  
15 consent form signed by Patient A just minutes prior to her surgery time. No complications were  
16 noted during surgery. The notes indicate Patient A was given written post-operative instructions,  
17 medication, and an appointment for follow-up in one week.

18 16. On or about August 21, 2018, Patient A had her first post-surgical visit with  
19 Respondent. Patient A did not complaint of any pain. Respondent examined Patient A's foot and  
20 determined there was no evidence of swelling or infection. Respondent placed a sterile dressing  
21 on Patient A's foot and instructed Patient A to return in one week. Patient A wanted to exercise  
22 her foot but Respondent advised against this until the sutures healed.

23 17. On or about August 28, 2018, Patient A went to Respondent for continued follow-up.  
24 On this day, Patient A's sutures were removed and steri-strips were applied. Patient A was  
25 progressing enough to be able to transition to a regular shoe and to submerge her foot in water.  
26 Patient A was advised to continue wearing orthotics. Respondent recommended physical therapy

27 <sup>2</sup> A surgical procedure involving cutting the metatarsal bone of the big toe and realigning  
28 the bone to correct a deformity.

<sup>3</sup> A surgical removal of a benign growth of new bone on top of existing bone.

1 to improve Patient A's range of motion. Patient A was instructed to return to Respondent as  
2 needed.

3 18. On or about November 19, 2018, Patient A filed a complaint with the Medical Board  
4 of California against Respondent. Patient A expressed her frustrations with the care, or lack  
5 thereof, provided to her by Respondent. Ultimately, Patient A sought treatment from another  
6 podiatrist to oversee her recovery.

7 19. On or about August 15, 2019, a Division of Investigation Investigator (DOI  
8 Investigator) spoke with Patient A to follow-up on Patient A's complaints. Patient A stated she  
9 did not sign a consent form for surgery during any of the pre-operative appointments she attended  
10 with Respondent. The only consent form signed was on the day of her actual surgery, August 15,  
11 2018. Patient A further explained that she asked Respondent to prescribe a prescription for pain  
12 medications but that Respondent was hesitant to sign a prescription. Patient A was also upset by  
13 the fact that after beginning her treatment with a physical therapist, an additional suture was  
14 located on her foot. Patient A had to go to a different podiatrist to remove that suture since she no  
15 longer trusted Respondent to care for her properly.

16 20. On October 25, 2019, a DOI Investigator interviewed Respondent regarding concerns  
17 Patient A brought forth about her treatment. Respondent readily discussed the treatment provided  
18 to Patient A. With respect to the consent form required for surgery, Respondent admitted she  
19 typically waits until the day of surgery to have patients sign consent forms. Respondent stated,  
20 "I'm actually really bad about that [having patients sign consent forms in her office]."  
21 Respondent was also asked whether she generally takes x-rays of her patients after surgery.  
22 Respondent noted it is not customary for her to take post-operative x-rays unless it is indicated.  
23 She further described that post-operative x-rays are necessary if patients have issues with trauma,  
24 infections, or osteomyelitis. The DOI Investigator informed Respondent that Patient A felt  
25 Respondent was hesitant to write a pain prescription for her. Respondent admitted she was indeed  
26 hesitant to prescribe opioids because she is "scared to death to prescribe" them.

27 ///

28 ///

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Gross Negligence)**

3 21. Respondent has subjected her Podiatric License No. E4738 to disciplinary action  
4 under sections 2222, 2497, and 2234, subdivision (b), of the Code, in that Respondent committed  
5 gross negligence in her care and treatment of Patient A. The circumstances are set forth in  
6 Paragraphs 10 through 20, above, which are incorporated herein as if fully set forth here.

7 Additional circumstances are as follows:

8 22. Respondent committed gross negligence in her care and treatment of Patient A for her  
9 acts and omissions, including but not limited to, using an improper billing code to pay for non-  
10 billable treatment.

11 **SECOND CAUSE FOR DISCIPLINE**

12 **(Repeated Negligent Acts)**

13 23. Respondent has further subjected her Podiatric License No. E4738 to disciplinary  
14 action under sections 2227 and 2234, subdivision (c), of the Code, in that Respondent committed  
15 repeated negligent acts in her care and treatment of Patient A. The circumstances are set forth in  
16 Paragraphs 10 through 20, above, which are incorporated herein as if fully set forth here.

17 24. Respondent was repeatedly negligent in her care of treatment of Patient A for her acts  
18 and omissions, including but not limited to, the following:

19 (a) Using an improper billing code to pay for non-billable treatment;

20 (b) Failure to obtain an in-office consent form from Patient A prior to surgery;

21 (c) Failure to provide adequate pain medication to the patient during the post-operative  
22 period tailored to the need of the patient;

23 (d) Failure to take postoperative x-rays following bone procedures;

24 (e) Failure to take vital signs at first postoperative visit;

25 (g) Failure to schedule a follow-up appointment at a minimum of 4 weeks following  
26 removal of sutures; and

27 (g) Failure to modify progress notes from one visit to another.

28 ///



1 THIRD CAUSE FOR DISCIPLINE

2 (General Unprofessional Conduct)

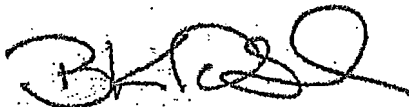
3 25. Respondent has further subjected her Podiatric License No. E4738 to disciplinary  
4 action under section 2234 in that she has engaged in conduct which breaches the rules or ethical  
5 code of the medical profession, or conduct which is unbecoming to a member in good standing of  
6 the medical profession, and which demonstrated an unfitness to practice medicine. The  
7 circumstances are set forth in paragraphs 10 through 24, above, which are incorporated here by  
8 reference 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 Podiatric Medical Board issue a decision:

- 12 1. Revoking or suspending Podiatrist License No. E4738, issued to Susan Margaret  
13 Ryan, D.P.M.;
- 14 2. Ordering Susan Margaret Ryan, D.P.M. to pay the Podiatric Medical Board the  
15 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
16 Professions Code section 2497.5; and
- 17 3. Taking such other and further action as deemed necessary and proper.
- 18
- 19

20 DATED: JUN 09 2020

21   
22 BRIAN NASLUND  
23 Executive Officer  
24 Podiatric Medical Board  
25 Department of Consumer Affairs  
26 State of California  
27 Complainant

28 SA2020101146  
34087088.docx