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

In the Matter of the Application of: Valerie Renee Williams Respondent.	Case No.: 800-2020-067883

DECISION AND ORDER

The attached Stipulation for a Probationary License 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 December 8, 2021.

IT IS SO ORDERED: December 1, 2021.

MEDICAL BOARD OF CALIFORNIA

Richard E. Thorp, M.D., Chair
Panel B

ROB BONTA
Attorney General of California
JUDITH T. ALVARADO
Supervising Deputy Attorney General
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BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Statement of Issues Against: **VALERIE RENEE WILLIAMS** **6035 S. Croft Avenue** **Los Angeles, CA 90056,** Applicant.	Case No. 800-2020-067883 OAH No. 2020110141 **STIPULATED SETTLEMENT AND PROBATIONARY ORDER**

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

PARTIES

1. William Prasifka (Complainant) is the Executive Director of the Medical Board of California (Board). He brought this action solely in his official capacity and is represented in this matter by Rob Bonta, Attorney General of the State of California, by Latrice R. Hemphill, Deputy Attorney General.

2. Applicant Valerie Renee Williams (Applicant) is represented in this proceeding by attorney Fredrick M. Ray, Esq., whose address is: 5000 Birch Street, Suite 7000, Newport Beach, CA 92660-2127.

3. On or about December 18, 2019, Applicant filed an application dated December 17, 2019, with the Medical Board of California to obtain a Physician's and Surgeon's Certificate.

JURISDICTION

4. Statement of Issues No. 800-2020-067883 was filed before the Board, and is currently pending against Applicant. The Statement of Issues and all other statutorily required documents were properly served on Applicant on October 22, 2020.

5. A copy of Statement of Issues No. 800-2020-067883 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Applicant has carefully read, fully discussed with counsel, and understands the charges and allegations in Statement of Issues No. 800-2020-067883. Applicant has also carefully read, fully discussed with her counsel, and understands the effects of this Stipulated Settlement and Probationary Order.

7. Applicant is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Statement of Issues; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her 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. Applicant voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

9. Applicant understands and agrees that the charges and allegations in Statement of Issues No. 800-2020-067883, if proven at a hearing, constitute cause for denying her application for a Physician's and Surgeon's Certificate.

10. For the purpose of resolving the Statement of issues without the expense and uncertainty of further proceedings, Applicant agrees that, at a hearing, Complainant could establish a factual basis for the charges in the Statement of issues, and that Applicant hereby gives

up her right to contest those charges. Applicant agrees that if she ever petitions for early termination or modification of probation, or if the Board ever petitions for revocation of probation, all of the charges and allegations contained in Statement of Issues No. 800-2020-067883 shall be deemed true, correct and fully admitted by Applicant for purposes of that proceeding or any other licensing proceeding involving Applicant in the State of California.

11. Applicant agrees that her Physician's and Surgeon's Certificate is subject to denial and she agrees to be bound by the Board's probationary terms as set forth in the Probationary Order below.

CONTINGENCY

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

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

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or opportunity to be heard by the Applicant, issue and enter the following Probationary Order:

PROBATIONARY ORDER

IT IS HEREBY ORDERED that Applicant Valerie Renee Williams' application for a full and unrestricted Physician's and Surgeon's Certificate is denied. However, Applicant shall be

issued a probationary license for three (3) years on the condition that Applicant be accepted into an ACGME-approved postgraduate residency training or fellowship program. Applicant's first year of practice shall be successfully performed in an ACGME-approved residency or fellowship program. Any period of probation not in a residency or fellowship program shall be under the supervision of a monitor as further described below.

1. WRITTEN EXAMINATION. Within 60 calendar days of the effective date of this Decision, Applicant shall take and pass the Special Purpose Examination (SPEX) or an equivalent examination as determined by the Board or its designee.

Failure to pass the required written examination within 180 calendar days after the effective date of this Decision is a violation of probation. Applicant shall pay the costs of all examinations.

Applicant shall not practice medicine until Applicant has passed the required examination and has been so notified by the Board or its designee in writing. This prohibition shall not bar Applicant from participating in a clinical competence assessment program approved by the Board or its designee.

2. SOLO PRACTICE PROHIBITION. Applicant is prohibited from engaging in the solo practice of medicine. Prohibited solo practice includes, but is not limited to, a practice where: 1) Applicant merely shares office space with another physician but is not affiliated for purposes of providing patient care, or 2) Applicant is the sole physician practitioner at that location.

If Applicant fails to establish a practice with another physician or secure employment in an appropriate practice setting within 60 calendar days of the effective date of this Decision, Applicant shall receive a notification from the Board or its designee to cease the practice of medicine within three (3) calendar days after being so notified. The Applicant shall not resume practice until an appropriate practice setting is established.

If, during the course of the probation, the Applicant's practice setting changes and the Applicant is no longer practicing in a setting in compliance with this Decision, the Applicant shall notify the Board or its designee within five (5) calendar days of the practice setting change. If Applicant fails to establish a practice with another physician or secure employment in an

appropriate practice setting within 60 calendar days of the practice setting change, Applicant shall receive a notification from the Board or its designee to cease the practice of medicine within three (3) calendar days after being so notified. The Applicant shall not resume practice until an appropriate practice setting is established.

3. PROHIBITED PRACTICE. During the first year of probation, Applicant is prohibited from practicing medicine outside of an ACGME-approved postgraduate residency or fellowship program.

4. MONITORING – PRACTICE. Within 30 calendar days of Applicant's successful completion of an ACGME-approved residency or fellowship program, Applicant shall submit to the Board or its designee for prior approval as a practice monitor, the name and qualifications of one or more licensed physicians and surgeons whose licenses are valid and in good standing, and who are preferably American Board of Medical Specialties (ABMS) certified. A monitor shall have no prior or current business or personal relationship with Applicant, or other relationship that could reasonably be expected to compromise the ability of the monitor to render fair and unbiased reports to the Board, including but not limited to any form of bartering, shall be in Applicant's field of practice, and must agree to serve as Applicant's monitor. Applicant shall pay all monitoring costs.

The Board or its designee shall provide the approved monitor with copies of the Decision and Statement of Issues, and a proposed monitoring plan. Within 15 calendar days of receipt of the Decision, Statement of Issues, and proposed monitoring plan, the monitor shall submit a signed statement that the monitor has read the Decision and Statement of Issues, fully understands the role of a monitor, and agrees or disagrees with the proposed monitoring plan. If the monitor disagrees with the proposed monitoring plan, the monitor shall submit a revised monitoring plan with the signed statement for approval by the Board or its designee.

Within 60 calendar days of Applicant's successful completion of an ACGME-approved residency or fellowship program, and continuing throughout probation, Applicant's practice shall be monitored by the approved monitor. Applicant shall make all records available for immediate inspection and copying on the premises by the monitor at all times during business hours and

shall retain the records for the entire term of probation.

If Applicant fails to obtain approval of a monitor within 60 calendar days of successful completion of an ACGME-approved residency or fellowship program, Applicant shall receive a notification from the Board or its designee to cease the practice of medicine within three (3) calendar days after being so notified. Applicant shall cease the practice of medicine until a monitor is approved to provide monitoring responsibility.

The monitor(s) shall submit a quarterly written report to the Board or its designee which includes an evaluation of Applicant's performance, indicating whether Applicant's practices are within the standards of practice of medicine and whether Applicant is practicing medicine safely, billing appropriately or both. It shall be the sole responsibility of Applicant to ensure that the monitor submits the quarterly written reports to the Board or its designee within 10 calendar days after the end of the preceding quarter.

If the monitor resigns or is no longer available, Applicant shall, within 5 calendar days of such resignation or unavailability, submit to the Board or its designee, for prior approval, the name and qualifications of a replacement monitor who will be assuming that responsibility within 15 calendar days. If Applicant fails to obtain approval of a replacement monitor within 60 calendar days of the resignation or unavailability of the monitor, Applicant shall receive notification from the Board or its designee to cease the practice of medicine within three (3) calendar days after being so notified. Applicant shall cease the practice of medicine until a replacement monitor is approved and assumes monitoring responsibility

In lieu of a monitor, Applicant may participate in a professional enhancement program approved in advance by the Board or its designee that includes, at minimum, quarterly chart review, semi-annual practice assessment, and semi-annual review of professional growth and education. Applicant shall participate in the professional enhancement program at Applicant's expense during the term of probation.

5. NOTIFICATION. Within seven (7) days of the effective date of this Decision, the Applicant shall provide a true copy of this Decision and Accusation to the Chief of Staff or the Chief Executive Officer at every hospital where privileges or membership are extended to

Applicant, at any other facility where Applicant engages in the practice of medicine, including all physician and locum tenens registries or other similar agencies, and to the Chief Executive Officer at every insurance carrier which extends malpractice insurance coverage to Applicant. Applicant shall submit proof of compliance to the Board or its designee within 15 calendar days.

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

6. SUPERVISION OF PHYSICIAN ASSISTANTS AND ADVANCED PRACTICE NURSES. During probation, Applicant is prohibited from supervising physician assistants and advanced practice nurses.

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

8. QUARTERLY DECLARATIONS. Applicant 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.

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

9. GENERAL PROBATION REQUIREMENTS.

Compliance with Probation Unit

Applicant shall comply with the Board's probation unit.

Address Changes

Applicant shall, at all times, keep the Board informed of Applicant's business and residence addresses, email address (if available), and telephone number. Changes of such 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).

Place of Practice

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

License Renewal

Applicant shall maintain a current and renewed California physician's and surgeon's license.

Travel or Residence Outside California

Applicant 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.

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

10. INTERVIEW WITH THE BOARD OR ITS DESIGNEE. Applicant shall be available in person upon request for interviews either at Applicant's place of business or at the probation unit office, with or without prior notice throughout the term of probation.

11. NON-PRACTICE WHILE ON PROBATION. Applicant shall notify the Board or its designee in writing within 15 calendar days of any periods of non-practice lasting more than 30 calendar days and within 15 calendar days of Applicant's return to practice. Non-practice is defined as any period of time Applicant is not practicing medicine as defined in Business and Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month in direct patient care, clinical activity or teaching, or other activity as approved by the Board. If Applicant resides in California and is considered to be in non-practice, Applicant 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 Applicant 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. A Board-ordered suspension of practice shall not be considered as a period of non-practice.

In the event Applicant's period of non-practice while on probation exceeds 18 calendar months, Applicant shall successfully complete the Federation of State Medical Board's Special

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

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

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

Periods of non-practice for an Applicant residing outside of California will relieve Applicant 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; Abstain from the Use of Alcohol and/or Controlled Substances; and Biological Fluid Testing.

12. COMPLETION OF PROBATION. Applicant shall comply with all financial obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the completion of probation. Upon successful completion of probation, Applicant's certificate shall be fully restored.

13. VIOLATION OF PROBATION. Failure to fully comply with any term or condition of probation is a violation of probation. If Applicant violates probation in any respect, the Board, after giving Applicant notice and the opportunity to be heard may seek to revoke probation or file disciplinary charges against Applicant. If an Accusation, or Petition to Revoke Probation, or an Interim Suspension Order is filed against Applicant 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.

14. LICENSE SURRENDER. Following the effective date of this Decision, if Applicant ceases practicing due to retirement or health reasons or is otherwise unable to satisfy the terms and conditions of probation, Applicant may request to surrender his or her license. The Board reserves the right to evaluate Applicant's request and to exercise its discretion in determining whether or not to grant the request, or to take any other action deemed appropriate and reasonable under the circumstances. Upon formal acceptance of the surrender, Applicant shall within 15 calendar days deliver Applicant's wallet and wall certificate to the Board or its designee and

Applicant shall no longer practice medicine. Applicant will no longer be subject to the terms and conditions of probation. If Applicant re-applies for a medical license, the application shall be treated as a petition for reinstatement of a revoked certificate.

15. PROBATION MONITORING COSTS. Applicant shall pay the costs associated with probation monitoring each and every year of probation, as designated by the Board, which may be adjusted on an annual basis. Such costs shall be payable to the Medical Board of California and delivered to the Board or its designee no later than January 31 of each calendar year.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Probationary Order and have fully discussed it with my attorney, Fredrick M. Ray, Esq. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and Probationary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: 07/14/2021

VALERIE RENEE WILLIAMS
Applicant

I have read and fully discussed with Applicant Valerie Renee Williams the terms and conditions and other matters contained in the above Stipulated Settlement and Probationary Order. I approve its form and content.

DATED: 7/14/2021

FREDRICK M. RAY, ESQ.
Attorney for Applicant

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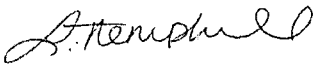
ENDORSEMENT

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

DATED: 7/15/2021

Respectfully submitted,

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



LATRICE R. HEMPHILL
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Statement of Issues No. 800-2020-067883

XAVIER BECERRA
Attorney General of California
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BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Statement of Issues Against: **VALERIE RENEE WILLIAMS** **6035 S. Croft Avenue** **Los Angeles, CA 90056-1612,** Applicant.	Case No. 800-2020-067883 **STATEMENT OF ISSUES**

Complainant alleges:

PARTIES

1. William Prasifka (Complainant) brings this Statement of Issues solely in his official capacity as the Executive Director of the Medical Board of California, Department of Consumer Affairs ("Board").

2. On or about December 18, 2019, the Board received an application for a Physician's and Surgeon's License from VALERIE RENEE WILLIAMS (Applicant). On or about December 17, 2019, Valerie Renee Williams certified under penalty of perjury to the truthfulness of all statements, answers, and representations in the application. The Board denied the application on April 8, 2020.

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JURISDICTION

3. This Statement of Issues is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 2221 of the Code states:

> (a) The board may deny a physician's and surgeon's certificate to an applicant guilty of unprofessional conduct or of any cause that would subject a licensee to revocation or suspension of their license. The board in its sole discretion, may issue a probationary physician's and surgeon's certificate to an applicant subject to terms and conditions, including, but not limited to, any of the following conditions of probation:
>
> (1) Practice limited to a supervised, structured environment where the licensee's activities shall be supervised by another physician and surgeon.
>
> (2) Total or partial restrictions on drug prescribing privileges for controlled substances.
>
> (3) Continuing medical or psychiatric treatment.
>
> (4) Ongoing participation in a specified rehabilitation program.
>
> (5) Enrollment and successful completion of a clinical training program.
>
> (6) Abstention from the use of alcohol or drugs.
>
> (7) Restrictions against engaging in certain types of medical practice.
>
> (8) Compliance with all provisions of this chapter.
>
> (9) Payment of the cost of probation monitoring.
>
> (b) The board may modify or terminate the terms and conditions imposed on the probationary certificate upon receipt of a petition from the licensee. The board may assign the petition to an administrative law judge designated in Section 11371 of the Government Code. After a hearing on the petition, the administrative law judge shall provide a proposed decision to the board.
>
> (c) The board shall deny a physician's and surgeon's certificate to an applicant who is required to register pursuant to Section 290 of the Penal Code. This subdivision does not apply to an applicant who is required to register as a sex offender pursuant to Section 290 of the Penal Code solely because of a misdemeanor conviction under Section 314 of the Penal Code.
>
> (d) An applicant shall not be eligible to reapply for a physician's and surgeon's certificate for a minimum of three years from the effective date of the denial of his or her application, except that the board may, in its discretion and for good cause demonstrated, permit reapplication after not less than one year has elapsed from the effective date of the denial.
>
> (e) The board shall disclose a probationary physician's and surgeon's certificate

issued pursuant to this section and the operative statement of issues to an inquiring member of the public and shall post the certificate and statement on the board's internet website for 10 years from issuance.

5. Section 2096 of the Code states:

(a) In addition to other requirements of this chapter, before a physician's and surgeon's license may be issued, each applicant, including an applicant applying pursuant to Article 5 (commencing with Section 2100), shall show by evidence satisfactory to the board that the applicant has successfully completed at least 36 months of board-approved postgraduate training.

(b) The postgraduate training required by this section shall include at least four months of general medicine and shall be obtained in a postgraduate training program approved by the Accreditation Council for Graduate Medical Education (ACGME), the Royal College of Physicians and Surgeons of Canada (RCPSC), orthe College of Family Physicians of Canada (CFPC)..

(c) An applicant who has completed at least 36 months of board-approved postgraduate training, not less than 24 months of which was completed as part of an oral and maxillofacial surgery postgraduate training program as a resident after receiving a medical degree from a combined dental and medical degree program accredited by the Commission on Dental Accreditation (CODA) or approved by the board, shall be eligible for licensure. Oral and maxillofacial surgery residency programs accredited by CODA shall be approved as postgraduate training required by this section if the applicant attended the program as part of a combined dental and medical degree program accredited by CODA. These applicants shall not have to comply with subdivision (b).

(d) This section shall become operative on January 1, 2020.

6. Section 2184 of the Code, states:

(a) Each applicant shall obtain on the written examination a passing score, established by the board pursuant to Section 2177.

(b)(1) Passing scores on each step of the United States Medical Licensing Examination shall be valid for a period of 10 years from the month of the examination for purposes of qualification for licensure in California.

(2) The period of validity provided for in paragraph (1) may be extended by the board for any of the following:

(A) For good cause.

(B) For time spent in a postgraduate training program, including, but not limited to, residency training, clinical training, fellowship training, remedial or refresher training, or other training that is intended to maintain or improve medical skills.

(C) For an applicant who is a physician and surgeon in another state or a Canadian province who is currently and actively practicing medicine in that state or province.

(3) Upon expiration of the 10-year period plus any extension granted by the board under paragraph (2), the applicant shall pass the Special Purpose Examination

of the Federation of State Medical Boards or a clinical competency written examination determined by the board to be equivalent.

7. Section 2234 of the Code, states:

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

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

(b) Gross negligence.

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

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

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

(d) Incompetence.

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

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

(g) The failure by a certificate holder, in the absence of good cause, to attend and participate in an interview by the board. This subdivision shall only apply to a certificate holder who is the subject of an investigation by the board.

FIRST CAUSE FOR DENIAL OF APPLICATION

(Postgraduate Training)

8. Applicant's application is subject to denial under Code section 2096, subdivision (a), in that the Applicant did not complete 36 months of required postgraduate training. The circumstances are as follows:

9. On or about August 1, 2000, Applicant graduated from the University of Kansas School of Medicine.

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10. Applicant began the Obstetrician/Gynecologist training program at Charles R. Drew University of Medicine & Science at Martin Luther King, Jr./Charles R. Drew Medical Center ("Drew Medical Center") on July 1, 2000. Applicant served as an intern from July 1, 2000 until June 30, 2001. Applicant started her position as a resident on July 1, 2001.

11. On or about October 29, 2001, Applicant voluntarily resigned from her residency program at Drew Medical Center, effective November 1, 2001.

12. On or about July 1, 2002, Applicant began a residency program at the California Hospital Medical Center.

13. On or about May 31, 2003, Applicant took a leave of absence from her residency program at California Hospital Medical Center. Applicant did not return to the program and her contract was not renewed.

14. Applicant completed about 27 months of postgraduate training.

SECOND CAUSE FOR DENIAL OF APPLICATION

(Valid Examination Scores)

15. Applicant's application is subject to denial under Code section 2184, subdivision (b)(1), in that the Applicant's scores on Step 1 and Step 2 of the United States Medical Licensing Examination (USMLE) have expired and are no longer valid. The circumstances are as follows:

16. On or about October 14, 1997, Applicant passed the USMLE Step 1, with a score of 189.

17. On or about May 17, 2000, Applicant passed the USMLE Step 2 Clinical Knowledge exam, with a score of 195. On or about March 29, 2014, Applicant passed the Step 2 Clinical Skills exam.

18. Applicant's Step 1 and Step 2 Clinical Knowledge exam scores are older than 10 years and are no longer valid.

THIRD CAUSE FOR DENIAL OF APPLICATION

(Incompetence)

19. Applicant's application is subject to denial under Code section 2234, subdivision (d), in that the Applicant has not engaged in any clinical duties or patient care since May 2003, and

the Applicant has not passed the USMLE Step 1 and Step 2 Clinical Knowledge exam within the past 10 years. The circumstances are as follows:

20. The allegations of the First and Second Causes for Denial of Application, in paragraphs 8 through 18, above, are incorporated herein by reference and re-alleged as if fully set forth.

PRAYER

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

1. Denying the application of VALERIE RENEE WILLIAMS for a Physician's and Surgeon's License.;

2. If issued a probationary license, ordering VALERIE RENEE WILLIAMS to pay the Medical Board the costs of probation monitoring;

3. If placed on probation, revoking, suspending, or denying approval to VALERIE RENEE WILLIAMS to supervise physician assistants and advanced practice nurses; and

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

DATED: Oct. 22, 2020

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

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