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

In the Matter of the Accusation Against: Taikeun Park, M.D. Physician's and Surgeon's Certificate No. C 51444 Respondent.	Case No. 800-2019-051730

DECISION

The attached Stipulated Surrender of License and 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 May 31, 2022.

IT IS SO ORDERED May 24, 2022.

MEDICAL BOARD OF CALIFORNIA

William Prasifka
Executive Director

ROB BONTA
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
ROSEMARY F. LUZON
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Attorneys for Complainant

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

In the Matter of the Accusation Against: **TAIKEUN PARK, M.D.** **13788 Torrey Del Mar Drive** **San Diego, CA 92130** **Physician's and Surgeon's Certificate No. C 51444,** Respondent.	Case No. 800-2019-051730 **STIPULATED SURRENDER OF LICENSE AND DISCIPLINARY 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 Rosemary F. Luzon, Deputy Attorney General.

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2. Respondent Taikeun Park, M.D. (Respondent) is represented in this proceeding by attorney David Rosenberg, Esq., whose address is: Rosenberg, Shpall & Zeigen, APLC, 10815 Rancho Bernardo Road, Suite 310, San Diego, CA 92127.

3. On or about December 12, 2003, the Board issued Physician's and Surgeon's Certificate No. C 51444 to Respondent. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2019-051730, and will expire on April 30, 2023, unless renewed.

JURISDICTION

4. On or about December 21, 2021, Accusation No. 800-2019-051730 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 or about December 21, 2021, at his address of record. Respondent timely filed his Notice of Defense contesting the Accusation.

5. A true and correct copy of Accusation No. 800-2019-051730 is attached as Exhibit A and incorporated by reference as if fully set forth herein.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2019-051730. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License 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 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, having been fully advised of same by his attorney, David Rosenberg, Esq.

8. Having the benefit of counsel, Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

9. Respondent does not contest that, at an administrative hearing, Complainant could establish a *prima facie* case with respect to the charges and allegations in Accusation No. 800-2019-051730, and Respondent hereby gives up his rights to contest those charges. Respondent further agrees that he has thereby subjected his Physician's and Surgeon's Certificate No. C 51444 to disciplinary action. Respondent hereby surrenders his Physician's and Surgeon's Certificate No. C 51444 for the Board's formal acceptance.

10. Respondent agrees that his Physician's and Surgeon's Certificate No. C 51444 is subject to discipline and he agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

11. Respondent further agrees that if he ever petitions for reinstatement of his Physician's and Surgeon's Certificate No. C 51444, or if an accusation or petition to revoke probation is ever filed against him before the Medical Board of California, all of the charges and allegations contained in Accusation No. 800-2019-051730 shall be deemed true, correct, and fully admitted by Respondent for purposes of any such proceeding or any other licensing proceeding involving Respondent in the State of California or elsewhere.

12. Respondent understands that, by signing this stipulation, he enables the Executive Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his Physician's and Surgeon's Certificate No. C 51444 without further notice to, or opportunity to be heard by, Respondent.

CONTINGENCY

13. This stipulation shall be subject to approval by the Medical Board of California. Respondent understands and agrees that counsel for Complainant and the staff of the Medical Board may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent or his counsel. By signing the stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or

effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

14. This Stipulated Surrender of License and Disciplinary Order is intended by the parties herein to be an integrated writing representing the complete, final, and exclusive embodiment of the agreements of the parties in the above-entitled matter.

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

16. 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 Respondent, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. C 51444, issued to Respondent Taikeun Park, M.D., is surrendered and accepted by the Medical Board of California.

1. The surrender of Respondent's Physician's and Surgeon's Certificate No. C 51444 and the acceptance of the surrendered license by the Medical Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Medical Board of California.

2. Respondent shall lose all rights and privileges as a Physician and Surgeon in California as of the effective date of the Medical Board's Decision and Order.

3. Respondent shall cause to be delivered to the Medical Board his pocket license and, if one was issued, his wall certificate on or before the effective date of the Medical Board's Decision and Order.

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

allegations contained in Accusation No. 800-2019-051730 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. Respondent shall pay the Medical Board a portion of its costs of investigation and enforcement in this matter in the amount of $6,806.25 (six thousand eight hundred six dollars and twenty-five cents) prior to issuance of a new or reinstated license.

6. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 800-2019-051730 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Disciplinary Order and have fully discussed it with my attorney, David Rosenberg, Esq. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate No. C 51444. I enter into this Stipulated Surrender of License and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: 04/29/2022

TAIKEUN PARK, M.D.
Respondent

I have read and fully discussed with Respondent Taikeun Park, M.D., the terms and conditions and other matters contained in this Stipulated Surrender of License and Disciplinary Order. I approve its form and content.

DATED: 5/2/22

DAVID ROSENBERG, ESQ.
Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Surrender of License and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California of the Department of Consumer Affairs.

DATED: 5/3/22

Respectfully submitted,

ROB BONTA
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General

ROSEMARY F. LUZON
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 800-2019-051730

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Attorneys for Complainant

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

In the Matter of the Accusation Against: **TAIKEUN PARK, M.D.** **13788 Torrey Del Mar Drive** **San Diego, CA 92130** **Physician's and Surgeon's Certificate** **No. C 51444,** Respondent.	Case No. 800-2019-051730 **A C C U S A T I O N**

PARTIES

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

2. On or about December 12, 2003, the Board issued Physician's and Surgeon's Certificate No. C 51444 to Taikeun Park, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought herein and will expire on April 30, 2023, unless renewed.

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JURISDICTION

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

4. Section 2220 of the Code states:

> Except as otherwise provided by law, the board may take action against all persons guilty of violating this chapter. . .

5. Section 2227 of the Code states:

> (a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter:
>
> (1) Have his or her license revoked upon order of the board.
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> (2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.
>
> (3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.
>
> (4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.
>
> (5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.
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> . . .

6. 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:
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> . . .
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> (b) Gross negligence.
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> (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.

. . .

7. Section 2266 of the Code states:

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

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

COST RECOVERY

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

10. Section 125.3 of the Code states:

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

(b) In the case of a disciplined licensee that is a corporation or a partnership, the order may be made against the licensed corporate entity or licensed partnership.

(c) A certified copy of the actual costs, or a good faith estimate of costs where actual costs are not available, signed by the entity bringing the proceeding or its

designated representative shall be prima facie evidence of reasonable costs of investigation and prosecution of the case. The costs shall include the amount of investigative and enforcement costs up to the date of the hearing, including, but not limited to, charges imposed by the Attorney General.

(d) The administrative law judge shall make a proposed finding of the amount of reasonable costs of investigation and prosecution of the case when requested pursuant to subdivision (a). The finding of the administrative law judge with regard to costs shall not be reviewable by the board to increase the cost award. The board may reduce or eliminate the cost award, or remand to the administrative law judge if the proposed decision fails to make a finding on costs requested pursuant to subdivision (a).

(e) If an order for recovery of costs is made and timely payment is not made as directed in the board's decision, the board may enforce the order for repayment in any appropriate court. This right of enforcement shall be in addition to any other rights the board may have as to any licensee to pay costs.

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

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

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

(h) All costs recovered under this section shall be considered a reimbursement for costs incurred and shall be deposited in the fund of the board recovering the costs to be available upon appropriation by the Legislature.

(i) Nothing in this section shall preclude a board from including the recovery of the costs of investigation and enforcement of a case in any stipulated settlement.

(j) This section does not apply to any board if a specific statutory provision in that board's licensing act provides for recovery of costs in an administrative disciplinary proceeding.

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FIRST CAUSE FOR DISCIPLINE

(Gross Negligence)

11. Respondent has subjected his Physician's and Surgeon's Certificate No. C 51444 to disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (b), of the Code, in that he committed gross negligence in his care and treatment of Patient A, as more particularly alleged hereinafter:[1]

12. Between in or about October 2018, and December 2018, Patient A was seen by Respondent during four (4) visits.

13. On or about December 21, 2018, Patient A had her final visit with Respondent. During this visit, Patient A presented for a follow-up regarding cold symptoms. Respondent noted a history of body ache, cough, sneezing, runny nose, sore throat, and fever. He also noted that Patient A's nephew had cold symptoms. Respondent documented a normal physical exam, including a lung exam with "clear" findings. A rapid in-office test for Influenza A and B was also performed, which was negative. Nevertheless, Respondent diagnosed Patient A with "[i]nfluenza" in addition to major depression. Respondent prescribed amoxicillin[2] to Patient A, as well as acetaminophen and dextromethorphan-guaifenesin (cough suppressant), as needed.

14. During this visit, Respondent conducted a cardiac exam on Patient A using a stethoscope. Prior to performing the exam, Respondent failed to explain to Patient A that he would be conducting a cardiac exam or the purpose for the exam. While conducting the cardiac exam, Respondent lifted the left side of Patient A's bra above her left breast without explanation or permission from Patient A to do so. Respondent's conduct resulted in him exposing and touching Patient A's left breast and nipple during the course of the cardiac exam.

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[1] References to "Patient A" herein are used to protect patient privacy.

[2] Amoxicillin is an antibiotic used to treat bacterial infections.

15. Respondent committed gross negligence in his care and treatment of Patient A, which included, but was not limited to the following:

A. Respondent conducted a cardiac exam on Patient A that lacked appropriate explanation to and permission from Patient A and that resulted in the exposure and touching of her left breast and nipple without medical indication or benefit to the patient.

SECOND CAUSE FOR DISCIPLINE

(Gross Negligence)

16. Respondent has subjected his Physician's and Surgeon's Certificate No. C 51444 to disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (b), of the Code, in that he committed gross negligence in his care and treatment of Patient A, as more particularly alleged hereinafter:

17. Paragraph 13, above, is hereby incorporated by reference and re-alleged as if fully set forth herein.

18. On or about October 12, 2018, October 19, 2018, and November 16, 2018, Patient A had three (3) additional visits with Respondent.

19. On or about October 12, 2018, Patient A presented with a chief complaint of lock jaw. Respondent noted a history of stiff jaw with difficulty opening her jaw for 20 to 30 minutes, fever and chills, no dysphagia, normal verbalization, and travel abroad in August. A physical exam was also noted, with normal findings. A rapid test for Influenza A and B was performed, which was negative. Labs were also performed, including a complete blood count, as well as two blood cultures. Respondent's assessments included pain radiating to the jaw, fever with chills, and migraine. Respondent's plan included prescriptions for acetaminophen, baclofen,[3] doxycycline,[4] and Imitrex.[5] During this visit, Respondent failed to document any exam of Patient A's jaw and he failed to obtain or document any details relating to her history of jaw stiffness and

[3] Baclofen is a muscle relaxant used to treat muscle spasms.

[4] Doxycycline is an antibiotic used to treat bacterial infections.

[5] Imitrex (sumatriptan) is used to treat symptoms of migraine headache and cluster headache.

pain. Moreover, despite diagnosing and treating Patient A for migraines, Respondent failed to obtain or document any history or symptoms relating to Patient A's migraines and he failed to perform or document a physical exam that included a neurologic exam or exam of the patient's head. Likewise, Respondent prescribed an antibiotic (doxycycline) to Patient A without a history, diagnosis, or physical exam suggestive of a bacterial infection. According to Respondent, he prescribed doxycycline for use as a broad spectrum anti-viral agent, even though doxycycline is an antibiotic used for treating bacterial infections. Lastly, Respondent failed to note the labs performed for Patient A.

20. On or about October 19, 2018, Patient A saw Respondent for a follow-up visit regarding her lock jaw. Respondent noted a history of stiff jaw and fever. Patient A reported persistent stiffness in her jaw, but no headaches, fever, chills, or dysphagia. Respondent noted a normal physical exam, but he failed to document any exam of Patient A's jaw. Respondent's assessment was pain radiating to the jaw and he prescribed acetaminophen, baclofen, and Imitrex as needed. Respondent also prescribed doxycycline to Patient A, however, the prescription lacked a history, diagnosis, or physical exam finding indicating the need for an antibiotic.

21. On or about November 16, 2018, Patient A had another follow-up visit regarding her stiff jaw. Respondent noted improvement with her jaw pain, but continuing jaw stiffness. He also noted Patient A's complaints of feeling depressed and anxious due to financial hardship, no dysphagia or blurry vision, and prior travel abroad. Respondent noted a normal physical exam, with the exception that the patient was "teary." Respondent diagnosed Patient A with depression and prescribed Lexapro[6] to her. Despite diagnosing and treating Patient A for depression, Respondent failed to obtain or document any history relating to Patient A's depression or past psychiatric diagnoses. Respondent also failed to perform or document any assessment of suicidal thoughts or plans.

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[6] Lexapro (escitalopram) is used to treat depression and anxiety.

22. Respondent committed gross negligence in his care and treatment of Patient A, which included, but was not limited to the following:

A. During the October 12, 2018, visit, Respondent failed to document any exam of Patient A's jaw and he failed to obtain or document any details relating to her history of jaw stiffness and pain.

B. During the October 12, 2018, visit, despite diagnosing and treating Patient A for migraines, Respondent failed to obtain or document any history or symptoms relating to Patient A's migraines and he failed to perform or document a physical exam that included a neurologic exam or exam of the patient's head.

C. During the October 12, 2018, visit, Respondent prescribed an antibiotic, doxycycline, to Patient A without a history, diagnosis, or physical exam suggestive of a bacterial infection.

D. During the October 12, 2018, visit, Respondent prescribed doxycycline to Patient A for use as a broad spectrum anti-viral agent, even though doxycycline is an antibiotic used for treating bacterial infections.

E. During the October 19, 2018, visit, Respondent again prescribed doxycycline to Patient A without a history, diagnosis, or physical exam finding indicating the need for an antibiotic.

F. During the November 16, 2018, visit, despite diagnosing and treating Patient A for depression, Respondent failed to obtain or document any history relating to Patient A's depression or past psychiatric diagnoses and he failed to perform or document any assessment of suicidal thoughts or plans.

G. During the December 21, 2018, visit, Respondent diagnosed Patient A with influenza despite a negative influenza test, and he prescribed amoxicillin to Patient A despite the fact that amoxicillin is an antibiotic that is not indicated for the treatment of viruses.

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THIRD CAUSE FOR DISCIPLINE

(Repeated Negligent Acts)

23. Respondent has subjected his Physician's and Surgeon's Certificate No. C 51444 to disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (c), of the Code, in that he committed repeated negligence acts in his care and treatment of Patient A, as more particularly alleged hereinafter:

24. Paragraphs 13 and 17 through 21, above, are hereby incorporated by reference and re-alleged as if fully set forth herein.

25. Respondent committed repeated negligent acts in his care and treatment of Patient A, which included, but were not limited to, the following:

A. During the October 12, 2018, visit, Respondent failed to document any exam of Patient A's jaw and he failed to obtain or document any details relating to her history of jaw stiffness and pain.

B. During the October 12, 2018, visit, despite diagnosing and treating Patient A for migraines, Respondent failed to obtain or document any history or symptoms relating to Patient A's migraines and he failed to perform or document a physical exam that included a neurologic exam or exam of the patient's head.

C. During the October 12, 2018, visit, Respondent prescribed an antibiotic, doxycycline, to Patient A without a history, diagnosis, or physical exam suggestive of a bacterial infection.

D. During the October 12, 2018, visit, Respondent prescribed doxycycline to Patient A for use as a broad spectrum anti-viral agent, even though doxycycline is an antibiotic used for treating bacterial infections.

E. During the October 19, 2018, visit, Respondent again prescribed doxycycline to Patient A without a history, diagnosis, or physical exam finding indicating the need for an antibiotic.

F. During the November 16, 2018, visit, despite diagnosing and treating Patient A for depression, Respondent failed to obtain or document any history

relating to Patient A's depression or past psychiatric diagnoses and he failed to perform or document any assessment of suicidal thoughts or plans.

G. During the December 21, 2018, visit, Respondent diagnosed Patient A with influenza despite a negative influenza test, and he prescribed amoxicillin to Patient A despite the fact that amoxicillin is an antibiotic that is not indicated for the treatment of viruses.

FOURTH CAUSE FOR DISCIPLINE

(Failure to Maintain Adequate and Accurate Records)

26. Respondent has subjected his Physician's and Surgeon's Certificate No. C 51444 to disciplinary action under sections 2227 and 2234, as defined by section 2266, of the Code, in that he failed to maintain adequate and accurate records regarding his care and treatment of Patient A, as more particularly alleged in paragraphs 13 and 17 through 21, above, which are hereby incorporated by reference and re-alleged as if fully set forth herein.

FIFTH CAUSE FOR DISCIPLINE

(General Unprofessional Conduct)

27. Respondent has subjected his Physician's and Surgeon's Certificate No. C 51444 to disciplinary action under sections 2227 and 2234 of the Code, in that he has engaged in conduct which breaches the rules or ethical code of the medical profession, or conduct which is unbecoming to a member in good standing of the medical profession, and which demonstrates an unfitness to practice medicine, as more particularly alleged in paragraphs 12 through 26, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

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. Revoking or suspending Physician's and Surgeon's Certificate No. C 51444, issued to Respondent Taikeun Park, M.D.;

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2. Revoking, suspending or denying approval of Respondent Taikeun Park, M.D.'s authority to supervise physician assistants, pursuant to section 3527 of the Code, and advanced practice nurses;

3. Ordering Respondent Taikeun Park, M.D., to pay the Board the costs of the investigation and enforcement of this case, and if placed on probation, the costs of probation monitoring; and

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

DATED: DEC 21 2021

Reji Varghese
Deputy Director

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

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