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

In the Matter of the Case Against: **Hugo Robert Paulson, M.D.** **2285 Corporate Circle, Ste. 200** **Henderson, NV 89074-7756** **Physician's and Surgeon's Certificate No. C 133346** **Respondent.**	**Case No. 800-2019-058197** **STIPULATION FOR SURRENDER OF LICENSE**

TO ALL PARTIES:

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

1. Complainant, Christine J. Lally, is the Interim Executive Director of the Medical Board of California, Department of Consumer Affairs ("Board").

2. Hugo Robert Paulson, M.D. ("Respondent") has carefully read and fully understands the effect of this Stipulation.

3. Respondent agrees that based on the action taken by the Arizona Medical Board, (Exhibit A) cause exists to discipline his California Physician's and Surgeon's certificate pursuant to Business and Professions Code sections 141(a) and 2305.

4. Respondent understands that, if proven at hearing, the charges and allegations under investigation would constitute cause for imposing discipline upon Respondent's license issued by the Board.

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5. Respondent is aware of each of his rights, including the right to a hearing, the right to confront and cross-examine witnesses who would testify against Respondent, the right to testify and present evidence on his own behalf, as well as to the issuance of subpoenas to compel the attendance of witnesses and the production of documents, the right to contest any charges and allegations, and other rights which are accorded Respondent pursuant to the California Administrative Procedure Act (Gov. Code, §11500 et seq.) and other applicable laws, including the right to seek reconsideration, review by the superior court, and appellate review.

6. In order to avoid the expense and uncertainty of a hearing, Respondent freely and voluntarily waives each and every one of these rights set forth above. Respondent hereby agrees to surrender Physician's and Surgeon's Certificate No. C 133346.

7. Respondent understands that by signing this Stipulation he is enabling the Board to accept the surrender of his license without further process, as provided by section 11415.60(b) of the Government Code.

8. Upon acceptance of the Stipulation by the Board, Respondent understands that he will no longer be permitted to practice as a Physician and Surgeon in California, and also agrees to surrender and cause to be delivered to the Board both his license and wallet certificate before the effective date of the Decision.

9. Respondent hereby represents that he does not intend to seek relicensure or reinstatement as a Physician and Surgeon. Respondent fully understands and agrees, however, that if Respondent ever files an application for relicensure or reinstatement in the State of California, the Board shall treat it as a Petition for Reinstatement, and the Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the Petition is filed. Case Report No. 800-2019-058197, including all referenced attachments and other exhibits, and any additional attachments, and other exhibits, that may be generated subsequent to the filing of the surrender of license, shall be admissible as direct evidence, and any time based defenses, such as laches or any applicable statute of limitations, shall be waived when the Board determines whether to grant or deny the Petition.

10. Respondent understands that this document may be disclosed to the public, and/or the National Practitioner Data Bank and/or the Federation of State Medical Boards.

ACCEPTANCE

I, Hugo Robert Paulson, M.D., have carefully read the above Stipulation and enter into it freely and voluntarily, with the full knowledge of its force and effect, do hereby surrender Physician's and Surgeon's Certificate No. C 133346, to the Medical Board of California. By signing this Stipulation for Surrender of License, I recognize that upon its formal acceptance by the Board, I will lose all rights and privileges to practice as a Physician and Surgeon in the State of California, and I also will cause to be delivered to the Board both my license and wallet certificate before the effective date of the Decision.

Hugo R Paulson — July 1, 2020

Hugo Robert Paulson, M.D.
Respondent — Date

/Katherine Faulkner — 7/1/2020

Attorney or Witness — Date

JUL 14 2020

~~Christine J. Lally~~ William Prasifka — Date
~~Interim~~ Executive Director
Medical Board of California

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Exhibit A

BEFORE THE ARIZONA MEDICAL BOARD

In the Matter of **HUGO R. PAULSON, M.D** Holder of License No. 49002 For the Practice of Medicine In the State of Arizona.	**Case No. MD-19-0017A** **ORDER FOR SURRENDER OF LICENSE AND CONSENT TO THE SAME**

Hugo R. Paulson, M.D. ("Respondent"), elects to permanently waive any right to a hearing and appeal with respect to this Order for Surrender of License; admits the jurisdiction of the Arizona Medical Board ("Board") as well as the facts stated herein; and consents to the entry of this Order by the Board.

FINDINGS OF FACT

1. The Board is the duly constituted authority for the regulation and control of the practice of allopathic medicine in the State of Arizona.

2. Respondent is the holder of license number 49002 for the practice of allopathic medicine in the State of Arizona.

3. The Board initiated case number MD-19-0017A after receiving a complaint from the mother of a minor female patient ("AC") regarding a dermatologic examination performed by Respondent, stating that Respondent's actions and statements made her daughter uncomfortable.

4. During the course of the Board's investigation, Board staff reviewed Respondent's employee file and noted previous complaints regarding failure to adequately communicate regarding the nature and purpose of some dermatological examinations.

5. Respondent denies that his evaluation of AC deviated from the standard of care but admits that he could have better communicated the nature and purpose of his dermatological evaluation for AC.

6. Respondent has retired from the practice of medicine, and requests surrender of his license.

CONCLUSIONS OF LAW

1. The Board possesses jurisdiction over the subject matter hereof and over Respondent.

2. The conduct and circumstances described above constitute unprofessional conduct pursuant to A.R.S. § 32-1401(27)(r) ("Committing any conduct or practice that is or might be harmful or dangerous to the health of the patient or the public.").

3. The Board possesses statutory authority to enter into a consent agreement with a physician and accept the surrender of an active license from a physician who admits to having committed an act of unprofessional conduct. A.R.S. § 32-1451(T)(2).

ORDER

IT IS HEREBY ORDERED THAT Respondent immediately surrender License Number 49002, issued to Hugo R. Paulson, M.D., for the practice of allopathic medicine in the State of Arizona, and return her/his certificate of licensure to the Board.

DATED and effective this 12th day of July, 2019.

ARIZONA MEDICAL BOARD

By: Patricia E. McSorley
Patricia E. McSorley
Executive Director

CONSENT TO ENTRY OF ORDER

1. Respondent has read and understands this Consent Agreement and the stipulated Findings of Fact, Conclusions of Law and Order ("Order"). Respondent acknowledges he has the right to consult with legal counsel regarding this matter.

2. Respondent acknowledges and agrees that this Order is entered into freely and voluntarily and that no promise was made or coercion used to induce such entry.

3. By consenting to this Order, Respondent voluntarily relinquishes any rights to a hearing or judicial review in state or federal court on the matters alleged, or to challenge this Order in its entirety as issued by the Board, and waives any other cause of action related thereto or arising from said Order.

4. The Order is not effective until approved by the Board and signed by its Executive Director.

5. All admissions made by Respondent are solely for final disposition of this matter and any subsequent related administrative proceedings or civil litigation involving the Board and Respondent. Therefore, said admissions by Respondent are not intended or made for any other use, such as in the context of another state or federal government regulatory agency proceeding, civil or criminal court proceeding, in the State of Arizona or any other state or federal court.

6. Upon signing this agreement, and returning this document (or a copy thereof) to the Board's Executive Director, Respondent may not revoke the consent to the entry of the Order. Respondent may not make any modifications to the document. Any modifications to this original document are ineffective and void unless mutually approved by the parties.

7. This Order is a public record that will be publicly disseminated as a formal disciplinary action of the Board and will be reported to the National Practitioner's Data Bank and on the Board's web site as a disciplinary action.

8. If the Board does not adopt this Order, Respondent will not assert as a defense that the Board's consideration of the Order constitutes bias, prejudice, prejudgment or other similar defense.

9. ***Respondent has read and understands the terms of this agreement.***

Hugo R Paulson MD Dated: June 10, 2019

HUGO R. PAULSON, M.D.

EXECUTED COPY of the foregoing mailed by US Mail this 12th day of July, 2019 to:

Robin Burgess, Esq.
Sanders Parks
3030 North Third Street, Suite 1300
Phoenix, Arizona 85012
Attorney for Respondent

ORIGINAL of the foregoing filed this 12th day of July, 2019 with:

The Arizona Medical Board
1740 West Adams, Suite 4000
Phoenix, Arizona 85007

Michelle Rosas
Board staff