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

In the Matter of the First Amended Accusation Against: Maurice Buchbinder, M.D. Physician's and Surgeon's Certificate No. A 38176 Respondent.	Case No. 800-2019-059319

DECISION

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

This Decision shall become effective at 5:00 p.m. on September 14, 2022.

IT IS SO ORDERED September 7, 2022.

MEDICAL BOARD OF CALIFORNIA

William Prasifka
Executive Director

ROB BONTA
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
KAROLYN M. WESTFALL
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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 First Amended Accusation Against: **MAURICE BUCHBINDER, M.D.** **9850 Genesee Avenue, Suite 780** **La Jolla, CA 92037-1232** **Physician's and Surgeon's Certificate No. A 38176,** Respondent.	Case No. 800-2019-059319 OAH No. 2021110238 **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 Karolyn M. Westfall, Deputy Attorney General.

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DOCUMENT CONFIDENTIAL
DO NOT DISCLOSE

2. Maurice Buchbinder, M.D. (Respondent) is represented in this proceeding by attorney David Rosenberg, Esq., whose address is: 10815 Rancho Bernardo Road, Suite 310 San Diego, CA 92127.

3. On or about March 22, 1982, the Board issued Physician's and Surgeon's Certificate No. A 38176 to Respondent. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in First Amended Accusation No. 800-2019-059319 and will expire on June 30, 2023, unless renewed.

4. On or about October 6, 2021, following a noticed hearing, an Interim Order of Suspension was issued by the Office of Administrative Hearings, immediately suspending Physician's and Surgeon's Certificate No. A 38176, and prohibiting Respondent from practicing medicine in the State of California. As a result, Respondent remains suspended from the practice of medicine pending the issuance of a final decision on the First Amended Accusation.

JURISDICTION

5. On or about January 31, 2022, First Amended Accusation No. 800-2019-059319, which superseded the Accusation filed on October 18, 2021, was filed before the Board, and is currently pending against Respondent. The First Amended Accusation and all other statutorily required documents were properly served on Respondent on January 31, 2022. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of First Amended Accusation No. 800-2019-059319 is attached hereto as Exhibit A and incorporated by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in First Amended Accusation No. 800-2019-059319. 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 First Amended Accusation; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the

production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

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

CULPABILITY

9. Respondent admits that, at an administrative hearing, Complainant could establish a *prima facie* case with respect to the charges and allegations contained in First Amended Accusation No. 800-2019-059319, agrees that he has thereby subjected his Physician's and Surgeon's Certificate No. A 38176 to discipline, and hereby surrenders his Physician's and Surgeon's Certificate No. A 38176 for the Board's formal acceptance.

10. Respondent further agrees that if he ever petitions for reinstatement of his Physician's and Surgeon's Certificate No. A 38176, all of the charges and allegations contained in First Amended Accusation No. 800-2019-059319, 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.

11. 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. A 38176 without further process.

12. With Respondent's early acknowledgement that cause exists for the Board's action, Complainant finds good cause under Business and Professions Code section 2307, subdivision (b)(1), and thereby agrees that Respondent may file a petition for reinstatement two (2) years after the effective date of the Board's Decision.

CONTINGENCY

13. Business and Professions Code section 2224, subdivision (b), provides, in pertinent part, that the Medical Board "shall delegate to its executive director the authority to adopt a ... stipulation for surrender of a license."

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14. This Stipulated Surrender of License and Disciplinary Order shall be subject to the approval of the Executive Director on behalf of the Board. The parties agree that this Stipulated Surrender of License and Disciplinary Order shall be submitted to the Executive Director for his consideration in the above-entitled matter and, further, that the Executive Director shall have a reasonable period of time in which to consider and act on this Stipulated Surrender of License and Disciplinary Order after receiving it. By signing this stipulation, Respondent fully understands and agrees that he may not withdraw his agreement or seek to rescind this stipulation prior to the time the Executive Director, on behalf of the Board, considers and acts upon it.

15. The parties agree that this Stipulated Surrender of License and Disciplinary Order shall be null and void and not binding upon the parties unless approved and adopted by the Executive Director on behalf of the Board, except for this paragraph, which shall remain in full force and effect. Respondent fully understands and agrees that in deciding whether or not to approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Executive Director and/or the Board may receive oral and written communications from its staff and/or the Attorney General's Office. Communications pursuant to this paragraph shall not disqualify the Executive Director, the Board, any member thereof, and/or any other person from future participation in this or any other matter affecting or involving Respondent. In the event that the Executive Director on behalf of the Board does not, in his discretion, approve and adopt this Stipulated Surrender of License and Disciplinary Order, with the exception of this paragraph, it shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied upon or introduced in any disciplinary action by either party hereto. Respondent further agrees that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason by the Executive Director on behalf of the Board, Respondent will assert no claim that the Executive Director, the Board, or any member thereof, was prejudiced by its/his/her review, discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or of any matter or matters related hereto.

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ADDITIONAL PROVISIONS

16. 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.

17. The parties agree that copies of this Stipulated Surrender of License and Disciplinary Order, including copies of the signatures of the parties, may be used in lieu of original documents and signatures and, further, that such copies shall have the same force and effect as originals.

18. In consideration of the foregoing admissions and stipulations, the parties agree the Executive Director of the Board may, without further notice to or opportunity to be heard by Respondent, issue and enter the following Disciplinary Order on behalf of the Board:

ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 38176, issued to Respondent Maurice Buchbinder, M.D., is surrendered and accepted by the Board.

1. The surrender of Respondent's Physician's and Surgeon's Certificate and the acceptance of the surrendered license by the 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 Board.

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

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

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the 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 First Amended Accusation No. 800-2019-059319 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

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5. Respondent shall pay the agency its costs of investigation and enforcement in the amount of $10,607.50 (ten thousand six hundred seven dollars and fifty 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 First Amended Accusation, No. 800-2019-059319 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. 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: 07 / 21 / 2022

Maurice Buchbinder

MAURICE BUCHBINDER, M.D.
Respondent

I have read and fully discussed with Respondent Maurice Buchbinder, 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: 7/21/22

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: 7/21/22

Respectfully submitted,

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

KAROLYN M. WESTFALL
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

First Amended Accusation No. 800-2019-059319

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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 First Amended Accusation Against: **MAURICE BUCHBINDER, M.D.** **9850 Genesee Avenue, #780** **La Jolla, CA 92037-1232** **Physician's and Surgeon's Certificate No. A 38176,** Respondent.	Case No. 800-2019-059319 **FIRST AMENDED ACCUSATION**

PARTIES

1. William Prasifka (Complainant) brings this First Amended 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 March 22, 1982, the Board issued Physician's and Surgeon's Certificate No. A 38176 to Maurice Buchbinder, 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 June 30, 2023, unless renewed.

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3. On or about October 6, 2021, following a noticed hearing, an Interim Order of Suspension was issued by the Office of Administrative Hearings, immediately suspending Physician's and Surgeon's Certificate No. A 38176, and prohibiting Respondent from practicing medicine in the State of California. As a result, Respondent remains suspended from the practice of medicine pending the issuance of a final decision after an administrative hearing on the Accusation.

JURISDICTION

4. This First Amended Accusation, which supersedes the Accusation filed on October 18, 2021, 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.

5. Section 2227 of the Code states, in pertinent part:

> (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.
>
> ...

6. Section 2234 of the Code, states, in pertinent part, that the board shall take action against any licensee who is charged with unprofessional conduct.

7. Unprofessional conduct under Business and Professions Code section 2234 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.)

8. Section 820 of the Code states:

> Whenever it appears that any person holding a license, certificate or permit under this division or under any initiative act referred to in this division may be unable to practice his or her profession safely because the licentiate's ability to practice is impaired due to mental illness, or physical illness affecting competency, the licensing agency may order the licentiate to be examined by one or more physicians and surgeons or psychologists designated by the agency. The report of the examiners shall be made available to the licentiate and may be received as direct evidence in proceedings conducted pursuant to Section 822.[1]

9. Section 821 of the Code provides that the licentiate's failure to comply with an order issued under section 820 shall constitute grounds for the suspension or revocation of the licentiate's certificate or license.[2]

10. Section 822 of the Code states:

> If a licensing agency determines that its licentiate's ability to practice his or her profession safely is impaired because the licentiate is mentally ill, or physically ill affecting competency, the licensing agency may take action by any one of the following methods:
>
> (a) Revoking the licentiate's certificate or license.
>
> (b) Suspending the licentiate's right to practice.
>
> (c) Placing the licentiate on probation.
>
> (d) Taking such other action in relation to the licentiate as the licensing agency in its discretion deems proper.
>
> The licensing section shall not reinstate a revoked or suspended certificate or license until it has received competent evidence of the absence or control of the condition which caused its action and until it is satisfied that with due regard for the public health and safety the person's right to practice his or her profession may be safely reinstated.

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[1] An Order compelling examinations pursuant to Section 820 complies with state procedural due process. (*Alexander D. v. State Board of Dental Examiners* (1991) 231 Cal.App.3d 92, 96-96.) Section 820 also complies with constitutional privacy interests. (*Kees v. Medical Board of California* (1992) 7 Cal.App.4th 1801, 1814.)

[2] The Court of Appeal has upheld the Board's authority to discipline a licensee for failure to comply with an Order to submit to examinations. With regards to disciplinary action taken pursuant to Section 821, all that is relevant is that the licensee did not comply with the Order. (*Lee v. Board of Registered Nursing* (2012) 209 Cal.App.4th 793, 798.)

COST RECOVERY

11. 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 licentiate 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.

FIRST CAUSE FOR DISCIPLINE

(Failure to Comply with Order of Examination)

12. Respondent has subjected his Physician's and Surgeon's Certificate No. A 38176 to disciplinary action under sections 2227 and 821, of the Code, in that he failed to comply with an Order issued pursuant to section 820 of the Code, as more particularly alleged hereinafter:

13. On or about March 23, 2019, Respondent was at work as an interventional cardiologist when he began experiencing difficulty speaking. After driving himself home, Respondent's speech issues continued. Respondent was taken to the hospital that evening and numerous tests confirmed he had suffered a left hemispheric cerebral infarction.

14. Over the next couple of months, Respondent improved neurologically but continued to suffer significant impairment, most notably in his speech. Respondent was subsequently diagnosed with aphasia[3] and apraxia.[4]

15. Between in or around April 2019, and in or around November 2020, Respondent received regular speech language pathology treatment. After approximately 133 sessions, Respondent continued to demonstrate mild deficits with both verbal communication and sometimes with comprehension.

16. In or around July 2019, Respondent returned to work in a clinical setting but did not resume working as an interventional cardiologist.

17. On or about January 14, 2020, Respondent obtained courtesy privileges at Paradise Valley Hospital and began assisting another cardiologist in interventional cardiology procedures.

18. On or about February 5, 2020, a Board investigator met with Respondent at his office. At that time, Respondent agreed to sign authorizations for release of his medical information, but informed the investigator that he would not voluntarily submit to physical or mental evaluations.

[3] Aphasia is the loss of ability to understand or express speech, caused by brain damage.

[4] Apraxia is the inability to perform particular purposive actions, as a result of brain damage.

19. On or about March 4, 2020, a Board investigator spoke with Dr. S.J., a neurologist who had been treating Respondent since his stroke. Dr. S.J. informed the Board investigator that he was not comfortable declaring that Respondent was safe to practice medicine, and that he believes a neuropsychological exam would be needed to evaluate his ability to practice safely.

20. On or about October 14, 2020, the Board issued an Order Granting Petition to Compel Neuropsychological and Physical Examinations of Respondent (Order).

21. On or about November 20, 2020, Respondent submitted to a physical evaluation by Board appointed psychiatrist and neurologist, J.H., M.D. (Dr. J.H.). After conducting a review of the materials and a physical evaluation, Dr. J.H. opined that Respondent suffers from aphasia, but is capable of practicing medicine safely.

22. On or about November 25, 2020, Respondent submitted to a mental evaluation by Board appointed psychiatrist, W.S., M.D. (Dr. W.S.). After conducting a review of the materials and a mental status examination, Dr. W.S. opined that Respondent suffers from sequelae of cerebral infarction with speech, language, and cognitive deficits. Specifically, Dr. W.S. found Respondent to have "significant speech and language problems that clearly impact his ability to communicate with patients...significant problems with expressive language, particularly with word finding difficulty, word substitution errors, and impaired fluency...reading was significantly impaired as was writing...significant impairment in his visuospatial ability, which more likely than not precludes his doing any cardiac procedures....and impaired attention, memory, and executive functions." Dr. W.S. found Respondent was not safe to practice interventional cardiology due to his cognitive impairment and visuospatial deficits, and that his continued practice would endanger the public health, safety, and welfare. Dr. W.S. recommended that Respondent undergo comprehensive neuropsychological testing to further delineate the nature and extent of his cognitive challenges.

23. On multiple dates in or around February and March 2021, a Board investigator attempted to speak with Respondent's attorney to schedule the comprehensive neuropsychological examination.

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24. On or about March 15, 2021, Respondent's attorney requested the investigator schedule the neuropsychological examination in May 2021.

25. On or about March 17, 2021, the Board investigator informed Respondent's attorney that the neuropsychological examination had been scheduled for May 21, 2021, and subsequently mailed a letter to Respondent's attorney confirming the scheduled appointment.

26. On or about May 19, 2021, Respondent's attorney informed the Board investigator that Respondent would not be attending the scheduled examination.

27. On or about May 21, 2021, Respondent failed to appear for his scheduled neuropsychological examination. On that same date, Respondent's attorney informed the Board investigator that he spoke with Respondent about the compelled Order, but Respondent did not have intentions to attend the examination.

28. On or about October 6, 2021, following a noticed hearing, an Interim Order of Suspension was issued by the Office of Administrative Hearings, immediately suspending Physician's and Surgeon's Certificate No. A 38176, and prohibiting Respondent from practicing medicine in the State of California.

29. On or about November 22, 2021, Respondent finally submitted to a neuropsychological evaluation by Board appointed clinical neuropsychologist, C.B., Ph.D. (Dr. C.B.). After conducting a review of the materials, clinical interview, and a neuropsychological examination and testing, Dr. C.B. opined that Respondent suffers from a mild neurocognitive disorder that affects his written and expressive language communication and other cognitive abilities essential to independent practice. Dr. C.B. found Respondent was not safe to practice medicine as a result of his neurocognitive disorder.

SECOND CAUSE FOR DISCIPLINE

(General Unprofessional Conduct)

30. Respondent has further subjected his Physician's and Surgeon's Certificate No. A 38176 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 29, above, which are hereby incorporated by reference as if fully set forth herein.

SECTION 822 CAUSE FOR ACTION

(Mental Illness and/or Physical Illness Affecting Competency)

31. Respondent is subject to action under section 822 of the Code in that his ability to practice medicine safely is impaired due to a mental illness and/or physical illness affecting competency, as a result of his cognitive impairment, as more particularly alleged in paragraphs 12 through 29, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

DISCIPLINARY CONSIDERATIONS

32. To determine the degree of discipline, if any, to be imposed on Respondent, Maurice Buchbinder, M.D., Complainant alleges that on or about September 19, 2011, in a prior disciplinary action entitled, *In the Matter of the Accusation Against Maurice Buchbinder, M.D.*, before the Medical Board of California, in Case No. 10-2007-186525, Respondent's Physician's and Surgeon's Certificate No. A 38176 was publicly reprimanded.

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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. A 38176, issued to Respondent Maurice Buchbinder M.D.;

2. Revoking, suspending or denying approval of Respondent Maurice Buchbinder M.D.'s authority to supervise physician assistants and advanced practice nurses;

3. Ordering Respondent Maurice Buchbinder 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 action as authorized by section 822 of the Code as the Board, in its discretion, deems necessary and proper; and

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

DATED: JAN 3 1 2022

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

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