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BEFORE THE
PHYSICIAN ASSISTANT EXAMINING COMMITTEE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: NORTON GRIM 927 Armor Drive Stockton, CA 95209 License No. PA-10046 Respondent.	No. D-4945 ACCUSATION

RAY E. DALE, the complainant herein, alleges as follows:

1. He is the Executive Officer of the Physician Assistant Examining Committee and makes and files this Accusation solely in his official capacity as such.

2. On or about December 30, 1976, respondent Norton Grim was issued license number PA-10046 as a physician assistant by the Physician Assistant Examining Committee. Said license is current and expires on March 31, 1993, if not renewed.

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3. Section 3527, subdivision (a) provides in pertinent part that the Physician Assistant Examing Committee of the Board of Medical Quality Assurance (the Committee) may order "the suspension or revocation of, or the imposition of probationary conditions upon a physician's assistant license after a hearing as required in section 3528 for unprofessional conduct which includes, but is not limited to, a violation of this chapter, a violation of the State Medical Practices Act, or a violation of the regulations adopted by the Committee or the Board."

4. Section 2262 of the Code provides that "[a]ltering or modifying the medical records of any person, with fraudulent intent, or creating any false medical record with fraudulent intent, constitutes unprofessional conduct."

5. Section 2234(e) of the Code provides in pertinent part that unprofessional conduct includes the "commission of any act involving dishonesty or corruption which is substantially related to the qualifications, functions, or duties of a physician and surgeon."

6. Respondent is subject to discipline pursuant to section 3527 of the Code as more specifically alleged as follows:

(A) On December 1, 1989, respondent telephoned a prescription to Gary's Pharmacy in Columbia, Tuolumne County, for tylenol with codeine. Respondent represented that the prescription was for a patient named Stephen Langfahr who was under the care of Dr. Lou Verre.

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However, Stephen Langfahr was not Dr. Verre's patient, and respondent prescribed the medication without Dr. Verre's authorization.

(B) On December 7, 1989, Dr. Verre was administering morphine to a patient at Groveland Clinic in Tuolumne County with no resultant pain relief. Respondent was present, and after several more unsuccessful administrations of morphine, respondent suggested that Demerol be used to relieve the patient's pain. The vials of morphine were subsequently examined and found to contain simple saline.

(C) On March 1, 1990, it was discovered at Groveland Clinic that approximately 47 administrations of Demerol as documented by respondent were either not received by the patients, or were documented as being administered to fictitious patients.

(D) On March 1, 1990, the staff at Groveland Clinic could not account for five controlled substance administration records signed for, and received by, respondent.

(E) On September 11, 1989, respondent noted in the records of patient E.M.[1] that Demerol had been administered, but that notation had been made without a nursing co-signature and after the supervisor's signature.

(F) On September 23, 1989, respondent noted prescribing 50 milligrams of Demerol for patient S.B; however, S.B. never received that medication.

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1. Patients' names provided on request.

(G) On November 13 and November 26, 1989, respondent noted prescribing Demerol for patient D.H; however, D.H. never received that medication.

(H) On November 22, 1989, a controlled substance record signed by respondent indicates that patient T.J. was prescribed 100 milligrams of Demerol; however, that medication was never administered.

WHEREFORE complainant prays that the Physician Assistant Examining Committee hold a hearing on the matters alleged herein and, following said hearing, issue a decision:

1. Suspending or revoking the license issued to Norton Grim; and

2. Taking such other and further action as the Board deems necessary and proper.

DATED: 9-17-92

RAY E. DALE
Executive Officer
Physician Assistant Examining Committee
Medical Board of California
Department of Consumer Affairs
State of California

Complainant