

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

<b>In the Matter of the Accusation</b>	)	
<b>Against:</b>	)	
	)	
	)	
<b>PETER THOMAS KATSIYIANNIS, M.D.)</b>	)	<b>Case No. 09-2013-231043</b>
	)	
<b>Physician's and Surgeon's</b>	)	
<b>Certificate No. G 88008</b>	)	
	)	
<b>Respondent</b>	)	
_____	)	

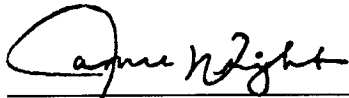
**DECISION**

The attached Stipulated Settlement 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 April 28, 2017.

IT IS SO ORDERED: March 29, 2017.

**MEDICAL BOARD OF CALIFORNIA**



\_\_\_\_\_  
Jamie Wright, JD, Chair  
Panel A

1 XAVIER BECERRA  
Attorney General of California  
2 MATTHEW M. DAVIS  
Supervising Deputy Attorney General  
3 JASON J. AHN  
Deputy Attorney General  
4 State Bar No. 253172  
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8 *Attorneys for Complainant*

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

In the Matter of the Accusation Against:  
**PETER THOMAS KATSIYIANNIS, M.D.**  
**4804 Laurel Canyon Blvd, # 218**  
**Valley Village, CA 91607-3717**  
**Physician's and Surgeon's Certificate**  
**No. G 88008,**  
  
Respondent.

Case No. 09-2013-231043  
OAH No. 2015090471  
**STIPULATED SETTLEMENT  
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. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board of California (Board). She brought this action solely in her official capacity and is represented in this matter by Kathleen A. Kenealy, Acting Attorney General of the State of California, by Jason J. Ahn, Deputy Attorney General.

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///



1 been fully advised of the same by his attorney of record, Robert W. Frank, Esq.

2 7. Respondent, having the benefit of counsel, hereby voluntarily, knowingly, and  
3 intelligently waives and gives up each and every right set forth above.

4 **CULPABILITY**

5 8. Respondent does not contest that, at an administrative hearing, complainant could  
6 establish a *prima facie* case with respect to the charges and allegations in Accusation No. 09-  
7 2013-231043, a true and correct copy of which is attached hereto as Attachment "A," and that he  
8 has thereby subjected his Physician's and Surgeon's Certificate No. G88008 to disciplinary  
9 action. Respondent further agrees to be bound by the Board's imposition of discipline as set forth  
10 in the Disciplinary Order below.

11 9. Respondent agrees that if he ever petitions for early termination or modification of  
12 probation, or if an accusation and/or petition to revoke probation is filed against him before the  
13 Medical Board of California, all of the charges and allegations contained in Accusation No. 09-  
14 2013-231043 shall be deemed true, correct and fully admitted by Respondent for purposes of any  
15 such proceeding or any other licensing proceeding involving Respondent in the State of  
16 California.

17 **CONTINGENCY**

18 10. The parties agree that this Stipulated Settlement and Disciplinary Order  
19 shall be submitted to the Board for its consideration in the above-entitled matter and, further, that  
20 the Board shall have a reasonable period of time in which to consider and act on this Stipulated  
21 Settlement and Disciplinary Order after receiving it. By signing this stipulation, Respondent fully  
22 understands and agrees that he may not withdraw his agreement or seek to rescind this stipulation  
23 prior to the time the Board considers and acts upon it.

24 11. The parties agree that this Stipulated Settlement and Disciplinary Order shall be null  
25 and void and not binding upon the parties unless approved and adopted by the Board, except for  
26 this paragraph, which shall remain in full force and effect. Respondent fully understands and  
27 agrees that in deciding whether or not to approve and adopt this Stipulated Settlement and  
28 Disciplinary Order, the Board may receive oral and written communications from its staff and/or

1 the Attorney General's office. Communications pursuant to this paragraph shall not disqualify  
2 the Board, any member thereof, and/or any other person from future participation in this or any  
3 other matter affecting or involving respondent. In the event that the Board, in its discretion, does  
4 not approve and adopt this Stipulated Settlement and Disciplinary Order, with the exception of  
5 this paragraph, it shall not become effective, shall be of no evidentiary value whatsoever, and  
6 shall not be relied upon or introduced in any disciplinary action by either party hereto.

7 Respondent further agrees that should the Board reject this Stipulated Settlement and Disciplinary  
8 Order for any reason, Respondent will assert no claim that the Board, or any member thereof, was  
9 prejudiced by its/his/her review, discussion and/or consideration of this Stipulated Settlement and  
10 Disciplinary Order or of any matter or matters related hereto.

#### 11 **ADDITIONAL PROVISIONS**

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

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

19 14. In consideration of the foregoing admissions and stipulations, the parties agree the  
20 Board may, without further notice to or opportunity to be heard by Respondent, issue and enter  
21 the following Disciplinary Order:

#### 22 **DISCIPLINARY ORDER**

23 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G88008 issued  
24 to Respondent Peter Thomas Katsiyiannis, M.D. is revoked. However, the revocation is stayed  
25 and Respondent is placed on probation for three (3) years on the following terms and conditions.

26 1. **EDUCATION COURSE**. Within 60 calendar days of the effective date of this  
27 Decision, and on an annual basis thereafter, Respondent shall submit to the Board or its designee  
28 for its prior approval educational program(s) or course(s) which shall not be less than 40 hours

1 per year, for each year of probation. The educational program(s) or course(s) shall be aimed at  
2 correcting any areas of deficient practice or knowledge and shall be Category I certified. The  
3 educational program(s) or course(s) shall be at Respondent's expense and shall be in addition to  
4 the Continuing Medical Education (CME) requirements for renewal of licensure. Following the  
5 completion of each course, the Board or its designee may administer an examination to test  
6 Respondent's knowledge of the course. Respondent shall provide proof of attendance for 65  
7 hours of CME of which 40 hours were in satisfaction of this condition.

8 2. MEDICAL RECORD KEEPING COURSE. Within 60 calendar days of the effective  
9 date of this Decision, Respondent shall enroll in a course in medical record keeping equivalent to  
10 the Medical Record Keeping Course offered by the Physician Assessment and Clinical Education  
11 Program, University of California, San Diego School of Medicine (Program), approved in  
12 advance by the Board or its designee. Respondent shall provide the program with any information  
13 and documents that the Program may deem pertinent. Respondent shall participate in and  
14 successfully complete the classroom component of the course not later than six (6) months after  
15 Respondent's initial enrollment. Respondent shall successfully complete any other component of  
16 the course within one (1) year of enrollment. The medical record keeping course shall be at  
17 Respondent's expense and shall be in addition to the Continuing Medical Education (CME)  
18 requirements for renewal of licensure.

19 A medical record keeping course taken after the acts that gave rise to the charges in the  
20 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board  
21 or its designee, be accepted towards the fulfillment of this condition if the course would have  
22 been approved by the Board or its designee had the course been taken after the effective date of  
23 this Decision.

24 Respondent shall submit a certification of successful completion to the Board or its  
25 designee not later than 15 calendar days after successfully completing the course, or not later than  
26 15 calendar days after the effective date of the Decision, whichever is later.

27 3. MONITORING - PRACTICE. Within 30 calendar days of the effective date of this  
28 Decision, Respondent shall submit to the Board or its designee for prior approval as a practice

1 monitor, the name and qualifications of one or more licensed physicians and surgeons whose  
2 licenses are valid and in good standing, and who are preferably American Board of Medical  
3 Specialties (ABMS) certified. A monitor shall have no prior or current business or personal  
4 relationship with Respondent, or other relationship that could reasonably be expected to  
5 compromise the ability of the monitor to render fair and unbiased reports to the Board, including  
6 but not limited to any form of bartering, shall be in Respondent's field of practice, and must agree  
7 to serve as Respondent's monitor. Respondent shall pay all monitoring costs.

8 The Board or its designee shall provide the approved monitor with copies of the Decision(s)  
9 and Accusation(s), and a proposed monitoring plan. Within 15 calendar days of receipt of the  
10 Decision(s), Accusation(s), and proposed monitoring plan, the monitor shall submit a signed  
11 statement that the monitor has read the Decision(s) and Accusation(s), fully understands the role  
12 of a monitor, and agrees or disagrees with the proposed monitoring plan. If the monitor disagrees  
13 with the proposed monitoring plan, the monitor shall submit a revised monitoring plan with the  
14 signed statement for approval by the Board or its designee.

15 Within 60 calendar days of the effective date of this Decision, and continuing throughout  
16 probation, Respondent's practice shall be monitored by the approved monitor. Respondent shall  
17 make all records available for immediate inspection and copying on the premises by the monitor  
18 at all times during business hours and shall retain the records for the entire term of probation.

19 If Respondent fails to obtain approval of a monitor within 60 calendar days of the effective  
20 date of this Decision, Respondent shall receive a notification from the Board or its designee to  
21 cease the practice of medicine within three (3) calendar days after being so notified. Respondent  
22 shall cease the practice of medicine until a monitor is approved to provide monitoring  
23 responsibility.

24 The monitor(s) shall submit a quarterly written report to the Board or its designee which  
25 includes an evaluation of Respondent's performance, indicating whether Respondent's practices  
26 are within the standards of practice of medicine, and whether Respondent is practicing medicine  
27 safely, billing appropriately or both. It shall be the sole responsibility of Respondent to ensure  
28 that the monitor submits the quarterly written reports to the Board or its designee within 10

1 calendar days after the end of the preceding quarter.

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

10 In lieu of a monitor, Respondent may participate in a professional enhancement program  
11 equivalent to the one offered by the Physician Assessment and Clinical Education Program at the  
12 University of California, San Diego School of Medicine, that includes, at minimum, quarterly  
13 chart review, semi-annual practice assessment, and semi-annual review of professional growth  
14 and education. Respondent shall participate in the professional enhancement program at  
15 Respondent's expense during the term of probation.

16 STANDARD CONDITIONS

17 4. NOTIFICATION. Within seven (7) days of the effective date of this Decision, the  
18 Respondent shall provide a true copy of this Decision and Accusation to the Chief of Staff or the  
19 Chief Executive Officer at every hospital where privileges or membership are extended to  
20 Respondent, at any other facility where Respondent engages in the practice of medicine,  
21 including all physician and locum tenens registries or other similar agencies, and to the Chief  
22 Executive Officer at every insurance carrier which extends malpractice insurance coverage to  
23 Respondent. Respondent shall submit proof of compliance to the Board or its designee within 15  
24 calendar days.

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

26 5. SUPERVISION OF PHYSICIAN ASSISTANTS. During probation, Respondent  
27 is prohibited from supervising physician assistants.

28 6. OBEY ALL LAWS. Respondent shall obey all federal, state and local laws, all



1 rules governing the practice of medicine in California and remain in full compliance with  
2 any court ordered criminal probation, payments, and other orders.

3 7. QUARTERLY DECLARATIONS. Respondent shall submit quarterly  
4 declarations under penalty of perjury on forms provided by the Board, stating whether there has  
5 been compliance with all the conditions of probation.

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

8 8. GENERAL PROBATION REQUIREMENTS.

9 Compliance with Probation Unit

10 Respondent shall comply with the Board's probation unit and all terms and conditions of  
11 this Decision.

12 Address Changes

13 Respondent shall, at all times, keep the Board informed of Respondent's business and  
14 residence addresses, email address (if available), and telephone number. Changes of such  
15 addresses shall be immediately communicated in writing to the Board or its designee. Under no  
16 circumstances shall a post office box serve as an address of record, except as allowed by Business  
17 and Professions Code section 2021(b).

18 Place of Practice

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

22 License Renewal

23 Respondent shall maintain a current and renewed California physician's and surgeon's  
24 license.

25 Travel or Residence Outside California

26 Respondent shall immediately inform the Board or its designee, in writing, of travel to any  
27 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than thirty  
28 (30) calendar days.

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

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

7 10. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board  
8 or its designee in writing within 15 calendar days of any periods of non-practice lasting more than  
9 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is  
10 defined as any period of time Respondent is not practicing medicine in California as defined in  
11 Business and Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month  
12 in direct patient care, clinical activity or teaching, or other activity as approved by the Board. All  
13 time spent in an intensive training program which has been approved by the Board or its designee  
14 shall not be considered non-practice. Practicing medicine in another state of the United States or  
15 Federal jurisdiction while on probation with the medical licensing authority of that state or  
16 jurisdiction shall not be considered non-practice. A Board-ordered suspension of practice shall  
17 not be considered as a period of non-practice.

18 In the event Respondent's period of non-practice while on probation exceeds 18 calendar  
19 months, Respondent shall successfully complete a clinical training program that meets the criteria  
20 of Condition 18 of the current version of the Board's "Manual of Model Disciplinary Orders and  
21 Disciplinary Guidelines" prior to resuming the practice of medicine.

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

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

24 Periods of non-practice will relieve Respondent of the responsibility to comply with the  
25 probationary terms and conditions with the exception of this condition and the following terms  
26 and conditions of probation: Obey All Laws; and General Probation Requirements.

27 11. COMPLETION OF PROBATION. Respondent shall comply with all financial  
28 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the

1 completion of probation. Upon successful completion of probation, Respondent's certificate shall  
2 be fully restored.

3 12. VIOLATION OF PROBATION. Failure to fully comply with any term or  
4 condition of probation is a violation of probation. If Respondent violates probation in any  
5 respect, the Board, after giving Respondent notice and the opportunity to be heard, may revoke  
6 probation and carry out the disciplinary order that was stayed. If an Accusation, or Petition to  
7 Revoke Probation, or an Interim Suspension Order is filed against Respondent during probation,  
8 the Board shall have continuing jurisdiction until the matter is final, and the period of probation  
9 shall be extended until the matter is final.

10 13. LICENSE SURRENDER. Following the effective date of this Decision, if  
11 Respondent ceases practicing due to retirement or health reasons or is otherwise unable to satisfy  
12 the terms and conditions of probation, Respondent may request to surrender his or her license.  
13 The Board reserves the right to evaluate Respondent's request and to exercise its discretion in  
14 determining whether or not to grant the request, or to take any other action deemed appropriate  
15 and reasonable under the circumstances. Upon formal acceptance of the surrender, Respondent  
16 shall within 15 calendar days deliver Respondent's wallet and wall certificate to the Board or its  
17 designee and Respondent shall no longer practice medicine. Respondent will no longer be subject  
18 to the terms and conditions of probation. If Respondent re-applies for a medical license, the  
19 application shall be treated as a petition for reinstatement of a revoked certificate.

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

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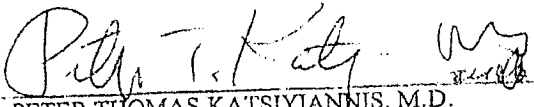
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ACCEPTANCE

1  
2 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
3 discussed it with my attorney, Robert W. Frank Esq.. I understand the stipulation and the effect it  
4 will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and  
5 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
6 Decision and Order of the Medical Board of California.

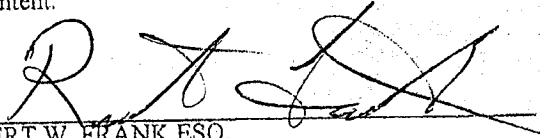
7  
8 DATED: 1/10/2017

  
PETER THOMAS KATSIYIANNIS, M.D.  
Respondent

9  
10 Public Address does not match current online

11 I have read and fully discussed with Respondent Peter Thomas Katsiyiannis, M.D., the  
12 terms and conditions and other matters contained in the above Stipulated Settlement and  
13 Disciplinary Order. I approve its form and content.

14  
15 DATED: 1-18-17

  
ROBERT W. FRANK ESQ.  
Attorney for Respondent

16  
17  
18 ENDORSEMENT

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

21 Dated:

Respectfully submitted,

22 KAMALA D. HARRIS  
23 Attorney General of California  
24 MATTHEW M. DAVIS  
25 Supervising Deputy Attorney General

26 JASON J. AHN  
27 Deputy Attorney General  
28 Attorneys for Complainant

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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Robert W. Frank 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 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: \_\_\_\_\_  
PETER THOMAS KATSIYIANNIS, M.D.  
*Respondent*

I have read and fully discussed with Respondent Peter Thomas Katsiyiannis, M.D., the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

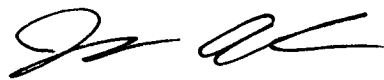
DATED: \_\_\_\_\_  
ROBERT W. FRANK ESQ.  
*Attorney for Respondent*

ENDORSEMENT

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

Dated: *February 3, 2017*

Respectfully submitted,  
XAVIER BECERRA  
Attorney General of California  
MATTHEW M. DAVIS  
Supervising Deputy Attorney General



JASON J. AHN  
Deputy Attorney General  
*Attorneys for Complainant*

**Exhibit A**

**Accusation No. 09-2013-231043**

1 KAMALA D. HARRIS  
Attorney General of California  
2 THOMAS S. LAZAR  
Supervising Deputy Attorney General  
3 MATTHEW M. DAVIS  
Deputy Attorney General  
4 State Bar No. 202766  
110 West "A" Street, Suite 1100  
5 San Diego, CA 92101  
P.O. Box 85266  
6 San Diego, CA 92186-5266  
Telephone: (619) 645-2093  
7 Facsimile: (619) 645-2061

8 *Attorneys for Complainant*

10 **BEFORE THE**  
11 **MEDICAL BOARD OF CALIFORNIA**  
12 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. 09-2013-231043

14 **PETER THOMAS KATSIYIANNIS, M.D.**  
15 **4804 Laurel Canyon Blvd, # 218**  
**Valley Village, CA 91607-3717**

**A C C U S A T I O N**

16 **Physician's and Surgeon's Certificate**  
17 **No. G 88008,**

Respondent.

19  
20 Complainant alleges:

21 **PARTIES**

22 1. Kimberly Kirchmeyer (complainant) brings this Accusation solely in her official  
23 capacity as the Executive Director of the Medical Board of California, Department of Consumer  
24 Affairs (Board).

25 2. On or about April 11, 2007, the Medical Board issued Physician's and Surgeon's  
26 Certificate Number G 88008 to Peter Thomas Katsiyiannis, M.D. (respondent). The Physician's  
27 and Surgeon's Certificate was in full force and effect at all times relevant to the charges and  
28 allegations brought herein and will expire on May 31, 2016, unless renewed.

**JURISDICTION**

1  
2       3.     This Accusation is brought before the Board, under the authority of the following  
3 laws. All section references are to the Business and Professions Code (Code) unless otherwise  
4 indicated.

5       4.     Section 2227 of the Code provides that a licensee who is found guilty under the  
6 Medical Practice Act may have his or her license revoked, suspended for a period not to exceed  
7 one year, be placed on probation and required to pay the costs of probation monitoring, be  
8 publicly reprimanded, or have such other action taken in relation to discipline as the Board deems  
9 proper.

10       5.     Section 2234 of the Code, states:

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

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

16       “(b) Gross negligence.

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

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

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

27       “...”





1 measure patient A.B.'s pulmonary pressure or review patient A.B.'s diagnostic or laboratory tests  
2 prior to ordering ionic contrast, CT angiogram or administering Metoprolol.

3 11. On or about April 17, 2012, patient A.B. deteriorated and became hypotensive  
4 approximately ninety (90) minutes after the CT angiogram and administration of Metoprolol. At  
5 approximately 8:00 p.m., patient A.B. expired due to cardiac arrest.

6 12. Respondent committed gross negligence in his care and treatment of patient A.B.  
7 which included, but was not limited to, the following:

8 (a) Respondent failed to physically examine patient A.B. prior to ordering a  
9 potentially dangerous procedure and drugs;

10 (b) Respondent failed to review patient A.B.'s previous diagnostic testing and  
11 laboratory testing prior to ordering a potentially dangerous procedure and drugs; and

12 (c) Respondent failed to order a pulmonary artery catheter to measure pulmonary  
13 pressure in a hemodynamically compromised patient.

#### 14 **SECOND CAUSE FOR DISCIPLINE**

##### 15 **(Repeated Negligent Acts)**

16 13. Respondent has further subjected his Physician's and Surgeon's Certificate Number  
17 G 88008 to disciplinary action under sections 2227 and 2234, as defined by section 2234,  
18 subdivision (c), of the Code, in that he committed repeated negligent acts in his care and  
19 treatment of patient A.B., as more particularly alleged hereinafter:

20 14. Paragraphs 7 through 12, above, are hereby incorporated by reference and realleged  
21 as if fully set forth herein.

#### 22 **THIRD CAUSE FOR DISCIPLINE**

##### 23 **(Failure to Maintain Adequate and Accurate Records)**

24 15. Respondent has further subjected his Physician's and Surgeon's Certificate Number  
25 G 88008 to disciplinary action under section 2227 and 2234, as defined by section 2266, of the  
26 Code, in that he failed to maintain adequate and accurate records relating to his care and treatment  
27 of patient A.B., as more particularly alleged hereinafter.

28

