

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

**In the Matter of the Accusation )  
Against: )**

**Laura Jean Seed, M.D. )**

**Case No. 800-2015-015334**

**Physician's and Surgeon's )  
Certificate No. G 55560 )**

**Respondent )  
\_\_\_\_\_ )**

**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 November 16, 2018.**

**IT IS SO ORDERED: October 17, 2018.**

**MEDICAL BOARD OF CALIFORNIA**



\_\_\_\_\_  
**Kristina D. Lawson, J.D., Chair  
Panel B**

1 XAVIER BECERRA  
Attorney General of California  
2 ALEXANDRA M. ALVAREZ  
Supervising Deputy Attorney General  
3 CHRISTINE A. RHEE  
Deputy Attorney General  
4 State Bar No. 295656  
600 West Broadway, Suite 1800  
5 San Diego, CA 92101  
P.O. Box 85266  
6 San Diego, CA 92186-5266  
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8 *Attorneys for Complainant*

9  
10 **BEFORE THE**  
**MEDICAL BOARD OF CALIFORNIA**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. 800-2015-015334

14 **LAURA SEED, M.D.**  
15 **8778 Spectrum Center Blvd., #450**  
**San Diego, CA 92123-5023**

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

16 **Physician's and Surgeon's Certificate**  
17 **No. G 55560,**

18 Respondent.

19  
20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
21 entitled proceedings that the following matters are true:

22 **PARTIES**

23 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board  
24 of California (Board). She brought this action solely in her official capacity and is represented in  
25 this matter by Xavier Becerra, Attorney General of the State of California, by Christine A. Rhee,  
26 Deputy Attorney General.

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1           2.     Respondent Laura Seed, M.D. (Respondent), is represented in this proceeding by  
2 attorney Albert J. Garcia, Esq. whose address is: 2000 Powell Street, Ste. 1290, Emeryville, CA  
3 94608.

4           3.     On or about July 29, 1985, the Board issued Physician's and Surgeon's Certificate  
5 No. G55560 to Laura Seed, M.D. (Respondent). Physician's and Surgeon's Certificate No.  
6 G55560 was in full force and effect at all times relevant to the charges brought in Accusation No.  
7 800-2015-015334, and will expire on August 31, 2020, unless renewed.

8                                   **JURISDICTION**

9           4.     Accusation No. 800-2015-015334 was filed before the Board, and is currently  
10 pending against Respondent. The Accusation and all other statutorily required documents were  
11 properly served on Respondent on July 9, 2018. Respondent timely filed her Notice of Defense  
12 contesting the Accusation.

13           5.     A copy of Accusation No. 800-2015-015334 is attached as Exhibit A and  
14 incorporated herein by reference.

15                                   **ADVISEMENT AND WAIVERS**

16           6.     Respondent has carefully read, fully discussed with counsel, and understands the  
17 charges and allegations in Accusation No. 800-2015-015334. Respondent has also carefully read,  
18 fully discussed with counsel, and understands the effects of this Stipulated Settlement and  
19 Disciplinary Order.

20           7.     Respondent is fully aware of her legal rights in this matter, including the right to a  
21 hearing on the charges and allegations in the Accusation; the right to confront and cross-examine  
22 the witnesses against her; the right to present evidence and to testify on her own behalf; the right  
23 to the issuance of subpoenas to compel the attendance of witnesses and the production of  
24 documents; the right to reconsideration and court review of an adverse decision; and all other  
25 rights accorded by the California Administrative Procedure Act and other applicable laws.

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

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1 CULPABILITY

2 9. Respondent admits that, at an administrative hearing, Complainant could establish a  
3 *prima facie* case with respect to the charges and allegations contained in Accusation No. 800-  
4 2015-015334, and agrees that she has thereby subjected her Physician's and Surgeon's Certificate  
5 No. G55560 to disciplinary action.

6 10. Respondent further agrees that if an accusation is ever filed against her before the  
7 Medical Board of California, all of the charges and allegations contained in Accusation No. 800-  
8 2015-015334 shall be deemed true, correct, and fully admitted by Respondent for purposes of any  
9 such proceeding or any other licensing proceeding involving Respondent in the State of  
10 California or elsewhere.

11 11. Respondent agrees that her Physician's and Surgeon's Certificate No. G55560 is  
12 subject to discipline and she agrees to be bound by the Board's probationary terms as set forth in  
13 the Disciplinary Order below.

14 CONTINGENCY

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

22 13. The parties agree that this Stipulated Settlement and Disciplinary Order shall be null  
23 and void and not binding upon the parties unless approved and adopted by the Board, except for  
24 this paragraph, which shall remain in full force and effect. Respondent fully understands and  
25 agrees that in deciding whether or not to approve and adopt this Stipulated Settlement and  
26 Disciplinary Order, the Board may receive oral and written communications from its staff and/or  
27 the Attorney General's office. Communications pursuant to this paragraph shall not disqualify  
28 the Board, any member thereof, and/or any other person from future participation in this or any

1 other matter affecting or involving Respondent. In the event that the Board, in its discretion, does  
2 not approve and adopt this Stipulated Settlement and Disciplinary Order, with the exception of  
3 this paragraph, it shall not become effective, shall be of no evidentiary value whatsoever, and  
4 shall not be relied upon or introduced in any disciplinary action by either party hereto.

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

9 **ADDITIONAL PROVISIONS**

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

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

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

20 **DISCIPLINARY ORDER**

21 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G55560 issued  
22 to Respondent Laura Seed, M.D., is revoked. However, the revocation is stayed and Respondent  
23 is placed on probation for five (5) years on the following terms and conditions. Once adopted by  
24 the Board, the stipulated settlement contained in Accusation No. 800-2015-015334 will supersede  
25 the terms of probation in Decision and Order No. 800-2015-017881. All terms and conditions of  
26 probation in Decision and Order No. 800-2015-017881 have been incorporated into the stipulated  
27 settlement in Accusation No. 800-2015-015334. Upon the effective date of the Decision and  
28 Order in Accusation No. 800-2015-015334, and once the time to challenge the matter has run,

1 probationary terms contained in Decision and Order No. 800-2015-017881 will be superseded by  
2 the terms of probation in the Decision and Order in Accusation No. 800-2015-015334.

3 1. MEDICAL RECORD KEEPING COURSE. Within 60 calendar days of the effective  
4 date of this Decision, Respondent shall enroll in a course in medical record keeping approved in  
5 advance by the Board or its designee. Respondent shall provide the approved course provider  
6 with any information and documents that the approved course provider may deem pertinent.  
7 Respondent shall participate in and successfully complete the classroom component of the course  
8 not later than six (6) months after Respondent's initial enrollment. Respondent shall successfully  
9 complete any other component of the course within one (1) year of enrollment. The medical  
10 record keeping course shall be at Respondent's expense and shall be in addition to the Continuing  
11 Medical Education (CME) requirements for renewal of licensure.

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

17 Respondent shall submit a certification of successful completion to the Board or its  
18 designee not later than 15 calendar days after successfully completing the course, or not later than  
19 15 calendar days after the effective date of the Decision, whichever is later.

20 2. PROFESSIONALISM PROGRAM (ETHICS COURSE). Within 60 calendar days of  
21 the effective date of this Decision, Respondent shall enroll in a professionalism program, that  
22 meets the requirements of Title 16, California Code of Regulations (CCR) section 1358.1.  
23 Respondent shall participate in and successfully complete that program. Respondent shall  
24 provide any information and documents that the program may deem pertinent. Respondent shall  
25 successfully complete the classroom component of the program not later than six (6) months after  
26 Respondent's initial enrollment, and the longitudinal component of the program not later than the  
27 time specified by the program, but no later than one (1) year after attending the classroom  
28 component. The professionalism program shall be at Respondent's expense and shall be in

1 addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

2 A professionalism program taken after the acts that gave rise to the charges in the  
3 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board  
4 or its designee, be accepted towards the fulfillment of this condition if the program would have  
5 been approved by the Board or its designee had the program been taken after the effective date of  
6 this Decision.

7 Respondent shall submit a certification of successful completion to the Board or its  
8 designee not later than 15 calendar days after successfully completing the program or not later  
9 than 15 calendar days after the effective date of the Decision, whichever is later.

10 3. PROFESSIONAL BOUNDARIES PROGRAM. Within 60 calendar days from the  
11 effective date of this Decision, Respondent shall enroll in a professional boundaries program  
12 approved in advance by the Board or its designee. Respondent, at the program's discretion, shall  
13 undergo and complete the program's assessment of Respondent's competency, mental health  
14 and/or neuropsychological performance, and at minimum, a 24 hour program of interactive  
15 education and training in the area of boundaries, which takes into account data obtained from the  
16 assessment and from the Decision(s), Accusation(s) and any other information that the Board or  
17 its designee deems relevant. The program shall evaluate Respondent at the end of the training  
18 and the program shall provide any data from the assessment and training as well as the results of  
19 the evaluation to the Board or its designee.

20 Failure to complete the entire program not later than six (6) months after Respondent's  
21 initial enrollment shall constitute a violation of probation unless the Board or its designee agrees  
22 in writing to a later time for completion. Based on Respondent's performance in and evaluations  
23 from the assessment, education, and training, the program shall advise the Board or its designee  
24 of its recommendation(s) for additional education, training, psychotherapy and other measures  
25 necessary to ensure that Respondent can practice medicine safely. Respondent shall comply with  
26 program recommendations. At the completion of the program, Respondent shall submit to a final  
27 evaluation. The program shall provide the results of the evaluation to the Board or its designee.

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1 The professional boundaries program shall be at Respondent's expense and shall be in addition to  
2 the Continuing Medical Education (CME) requirements for renewal of licensure.

3 The program has the authority to determine whether or not Respondent successfully  
4 completed the program.

5 A professional boundaries course taken after the acts that gave rise to the charges in the  
6 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board  
7 or its designee, be accepted towards the fulfillment of this condition if the course would have  
8 been approved by the Board or its designee had the course been taken after the effective date of  
9 this Decision.

10 4. PSYCHIATRIC EVALUATION. Within 30 calendar days of the effective date of  
11 this Decision, and on whatever periodic basis thereafter may be required by the Board or its  
12 designee, Respondent shall undergo and complete a psychiatric evaluation (and psychological  
13 testing, if deemed necessary) by a Board-appointed board certified psychiatrist, who shall  
14 consider any information provided by the Board or designee, including a copy of the Decision  
15 and Order for Case No. 800-2015-017881, and any other information the psychiatrist deems  
16 relevant, and shall furnish a written evaluation report to the Board or its designee. Psychiatric  
17 evaluations conducted prior to the effective date of the Decision and Order for Case No. 800-  
18 2015-017881 shall not be accepted towards the fulfillment of this requirement. Respondent shall  
19 pay the cost of all psychiatric evaluations and psychological testing.

20 Respondent shall comply with all restrictions or conditions recommended by the evaluating  
21 psychiatrist within 15 calendar days after being notified by the Board or its designee.

22 Respondent shall not engage in the practice of medicine until notified by the Board or its  
23 designee that Respondent is mentally fit to practice medicine safely. The period of time that  
24 Respondent is not practicing medicine shall not be counted toward completion of the term of  
25 probation.

26 5. PSYCHOTHERAPY. Within 60 calendar days of the effective date of this Decision,  
27 Respondent shall submit to the Board or its designee for prior approval the name and  
28 qualifications of a California-licensed board certified psychiatrist or a licensed psychologist who



1 has a doctoral degree in psychology and at least five years of postgraduate experience in the  
2 diagnosis and treatment of emotional and mental disorders. Upon approval, Respondent shall  
3 undergo and continue psychotherapy treatment, including any modifications to the frequency of  
4 psychotherapy, until the Board or its designee deems that no further psychotherapy is necessary.

5 The psychotherapist shall consider any information provided by the Board or its designee  
6 and any other information the psychotherapist deems relevant and shall furnish a written  
7 evaluation report to the Board or its designee. Respondent shall cooperate in providing the  
8 psychotherapist with any information and documents that the psychotherapist may deem  
9 pertinent.

10 Respondent shall have the treating psychotherapist submit quarterly status reports to the  
11 Board or its designee. The Board or its designee may require Respondent to undergo psychiatric  
12 evaluations by a Board-appointed board certified psychiatrist. If, prior to the completion of  
13 probation, Respondent is found to be mentally unfit to resume the practice of medicine without  
14 restrictions, the Board shall retain continuing jurisdiction over Respondent's license and the  
15 period of probation shall be extended until the Board determines that Respondent is mentally fit  
16 to resume the practice of medicine without restrictions.

17 Respondent shall pay the cost of all psychotherapy and psychiatric evaluations.

18 6. MONITORING - PRACTICE. Within 30 calendar days of the effective date of  
19 Decision and Order for Case No. 800-2015-017881, Respondent shall submit to the Board or its  
20 designee for prior approval as a practice monitor, the name and qualifications of one or more  
21 licensed physicians and surgeons whose licenses are valid and in good standing, and who are  
22 preferably American Board of Medical Specialties (ABMS) certified. A monitor shall have no  
23 prior or current business or personal relationship with Respondent, or other relationship that could  
24 reasonably be expected to compromise the ability of the monitor to render fair and unbiased  
25 reports to the Board, including but not limited to any form of bartering, shall be in Respondent's  
26 field of practice, and must agree to serve as Respondent's monitor. Respondent shall pay all  
27 monitoring costs.

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1 The Board or its designee shall provide the approved monitor with copies of the Decisions  
2 and Accusations, and a proposed monitoring plan. Within 15 calendar days of receipt of the  
3 Decisions, Accusations, and proposed monitoring plan, the monitor shall submit a signed  
4 statement that the monitor has read the Decisions and Accusations, fully understands the role of a  
5 monitor, and agrees or disagrees with the proposed monitoring plan. If the monitor disagrees  
6 with the proposed monitoring plan, the monitor shall submit a revised monitoring plan with the  
7 signed statement for approval by the Board or its designee.

8 Within 60 calendar days of the effective date of the Decision and Order for Case No. 800-  
9 2015-017881, and continuing throughout probation, Respondent's practice shall be monitored by  
10 the approved monitor. Respondent shall make all records available for immediate inspection and  
11 copying on the premises by the monitor at all times during business hours and shall retain the  
12 records for the entire term of probation.

13 If Respondent fails to obtain approval of a monitor within 60 calendar days of the effective  
14 date of the Decision and Order for Case No. 800-2015-017881, Respondent shall receive a  
15 notification from the Board or its designee to cease the practice of medicine within three (3)  
16 calendar days after being so notified. Respondent shall cease the practice of medicine until a  
17 monitor is approved to provide monitoring responsibility.

18 The monitor shall submit a quarterly written report to the Board or its designee which  
19 includes an evaluation of Respondent's performance, indicating whether Respondent's practices  
20 are within the standards of practice of medicine, and whether Respondent is practicing medicine  
21 safely, billing appropriately or both. It shall be the sole responsibility of Respondent to ensure  
22 that the monitor submits the quarterly written reports to the Board or its designee within 10  
23 calendar days after the end of the preceding quarter.

24 If the monitor resigns or is no longer available, Respondent shall, within 5 calendar days of  
25 such resignation or unavailability, submit to the Board or its designee, for prior approval, the  
26 name and qualifications of a replacement monitor who will be assuming that responsibility within  
27 15 calendar days. If Respondent fails to obtain approval of a replacement monitor within 60  
28 calendar days of the resignation or unavailability of the monitor, Respondent shall receive a

1 notification from the Board or its designee to cease the practice of medicine within three (3)  
2 calendar days after being so notified. Respondent shall cease the practice of medicine until a  
3 replacement monitor is approved and assumes monitoring responsibility.

4 In lieu of a monitor, Respondent may participate in a professional enhancement program  
5 approved in advance by the Board or its designee that includes, at minimum, quarterly chart  
6 review, semi-annual practice assessment, and semi-annual review of professional growth and  
7 education. Respondent shall participate in the professional enhancement program at Respondent's  
8 expense during the term of probation.

9 7. NOTIFICATION. Within seven (7) days of the effective date of this Decision, the  
10 Respondent shall provide a true copy of the Decisions and Accusations to the Chief of Staff or the  
11 Chief Executive Officer at every hospital where privileges or membership are extended to  
12 Respondent, at any other facility where Respondent engages in the practice of medicine,  
13 including all physician and locum tenens registries or other similar agencies, and to the Chief  
14 Executive Officer at every insurance carrier which extends malpractice insurance coverage to  
15 Respondent. Respondent shall submit proof of compliance to the Board or its designee within 15  
16 calendar days.

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

18 8. SUPERVISION OF PHYSICIAN ASSISTANTS AND ADVANCED PRACTICE  
19 NURSES. During probation, Respondent is prohibited from supervising physician assistants and  
20 advanced practice nurses.

21 9. OBEY ALL LAWS. Respondent shall obey all federal, state and local laws, all rules  
22 governing the practice of medicine in California and remain in full compliance with any court  
23 ordered criminal probation, payments, and other orders.

24 10. QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations  
25 under penalty of perjury on forms provided by the Board, stating whether there has been  
26 compliance with all the conditions of probation.

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

1           11. GENERAL PROBATION REQUIREMENTS.

2           Compliance with Probation Unit

3           Respondent shall comply with the Board's probation unit.

4           Address Changes

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

10          Place of Practice

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

14          License Renewal

15          Respondent shall maintain a current and renewed California physician's and surgeon's  
16 license.

17          Travel or Residence Outside California

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

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

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

27          13. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or  
28 its designee in writing within 15 calendar days of any periods of non-practice lasting more than

1 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is  
2 defined as any period of time Respondent is not practicing medicine as defined in Business and  
3 Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month in direct  
4 patient care, clinical activity or teaching, or other activity as approved by the Board. If  
5 Respondent resides in California and is considered to be in non-practice, Respondent shall  
6 comply with all terms and conditions of probation. All time spent in an intensive training  
7 program which has been approved by the Board or its designee shall not be considered non-  
8 practice and does not relieve Respondent from complying with all the terms and conditions of  
9 probation. Practicing medicine in another state of the United States or Federal jurisdiction while  
10 on probation with the medical licensing authority of that state or jurisdiction shall not be  
11 considered non-practice. A Board-ordered suspension of practice shall not be considered as a  
12 period of non-practice.

13 In the event Respondent's period of non-practice while on probation exceeds 18 calendar  
14 months, Respondent shall successfully complete the Federation of State Medical Boards's Special  
15 Purpose Examination, or, at the Board's discretion, a clinical competence assessment program  
16 that meets the criteria of Condition 18 of the current version of the Board's "Manual of Model  
17 Disciplinary Orders and Disciplinary Guidelines" prior to resuming the practice of medicine.

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

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

20 Periods of non-practice for a Respondent residing outside of California will relieve  
21 Respondent of the responsibility to comply with the probationary terms and conditions with the  
22 exception of this condition and the following terms and conditions of probation: Obey All Laws;  
23 General Probation Requirements; and Quarterly Declarations.

24 14. COMPLETION OF PROBATION. Respondent shall comply with all financial  
25 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the  
26 completion of probation. Upon successful completion of probation, Respondent's certificate shall  
27 be fully restored.

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

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

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

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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Albert J. Garcia, 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: 9-12-18

*Laura Jean Seed, M.D.*  
LAURA JEAN SEED, M.D.  
*Respondent*

I have read and fully discussed with Respondent Laura Jean Seed, 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: September 12, 2018

*Albert Garcia*  
ALBERT J. GARCIA, 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:

Respectfully submitted,  
XAVIER BECERRA  
Attorney General of California  
ALEXANDRA M. ALVAREZ  
Supervising Deputy Attorney General

CHRISTINE A. RHEE  
Deputy Attorney General  
*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, Albert J. Garcia, 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: \_\_\_\_\_  
LAURA JEAN SEED, M.D.  
*Respondent*

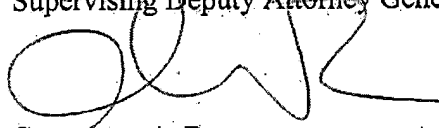
I have read and fully discussed with Respondent Laura Jean Seed, M.D. the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: \_\_\_\_\_  
ALBERT J. GARCIA, 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: 9/17/18

Respectfully submitted,  
XAVIER BECERRA  
Attorney General of California  
ALEXANDRA M. ALVAREZ  
Supervising Deputy Attorney General  
  
CHRISTINE A. RHEE  
Deputy Attorney General  
*Attorneys for Complainant*



**Exhibit A**

**Accusation No. 800-2015-015334**

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FILED  
STATE OF CALIFORNIA  
MEDICAL BOARD OF CALIFORNIA  
SACRAMENTO July 9 2018  
BY SUA P. SIDA ANALYST

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. 800-2015-015334

14 **LAURA SEED, M.D.**  
15 **8778 Spectrum Center Boulevard, #450**  
**San Diego, CA 92123**

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

16 **Physician's and Surgeon's Certificate**  
17 **No. G55560,**

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.

24 2. On or about July 29, 1985, the Medical Board issued Physician's and Surgeon's  
25 Certificate No. G55560 to Laura Seed, M.D. (Respondent). Physician's and Surgeon's Certificate  
26 No. G55560 was in full force and effect at all times relevant to the charges brought herein and  
27 will expire on August 31, 2020, unless renewed.

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1 **DISCIPLINARY HISTORY**

2 3. In a previous disciplinary action entitled, *In the Matter of the Accusation Against:*  
3 *Laura Seed, M.D.*, Case No. 800-2015-017881, the Board issued a Decision and Order, effective  
4 April 13, 2018, in which Respondent's Physician's and Surgeon's Certificate No. G55560 was  
5 revoked. The revocation was stayed, however, and Respondent's Physician's and Surgeon's  
6 Certificate No. G55560 was placed on probation for a period of five (5) years with certain terms  
7 and conditions.

8 **JURISDICTION**

9 4. This Accusation is brought before the Medical Board of California (Board),  
10 Department of Consumer Affairs, under the authority of the following laws. All section  
11 references are to the Business and Professions Code (Code) unless otherwise indicated.

12 5. Section 2227 of the Code states:

13 "(a) A licensee whose matter has been heard by an administrative law judge of  
14 the Medical Quality Hearing Panel as designated in Section 11371 of the Government  
15 Code, or whose default has been entered, and who is found guilty, or who has entered  
16 into a stipulation for disciplinary action with the board, may, in accordance with the  
17 provisions of this chapter:

18 "(1) Have his or her license revoked upon order of the board.

19 "(2) Have his or her right to practice suspended for a period not to exceed one  
20 year upon order of the board.

21 "(3) Be placed on probation and be required to pay the costs of probation  
22 monitoring upon order of the board.

23 "(4) Be publicly reprimanded by the board. The public reprimand may include a  
24 requirement that the licensee complete relevant educational courses approved by the  
25 board.

26 "(5) Have any other action taken in relation to discipline as part of an order of  
27 probation, as the board or an administrative law judge may deem proper.

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“(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical review or advisory conferences, professional competency examinations, continuing education activities, and cost reimbursement associated therewith that are agreed to with the board and successfully completed by the licensee, or other matters made confidential or privileged by existing law, is deemed public, and shall be made available to the public by the board pursuant to Section 803.1.”

6. Section 2234 of the Code, states, in pertinent part:

“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:

“...

“(b) Gross negligence.

“(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.

“...”

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.”

**FIRST CAUSE FOR DISCIPLINE**  
**(Gross Negligence)**

8. Respondent has subjected her Physician’s and Surgeon’s Certificate No. G55560 to disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (b), of the Code, in that she committed gross negligence in the care and treatment of Patient A.<sup>1</sup> The circumstances are as follows:

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<sup>1</sup> Letters are used to protect the patients’ privacy.

1           9.    On or about October 6, 2010,<sup>2</sup> Patient A saw Respondent regarding her relationship  
2 with Patient B, Patient A's domestic partner. Patient A and Patient B had been referred to  
3 Respondent by a marriage and family therapist who thought that Patient B might be bipolar and  
4 need medication.

5           10. On or about October 6, 2010, Respondent had Patient A review and sign a document  
6 entitled, "Office Policies and Treatment Agreement." Patient A also signed an authorization for  
7 release of information for the referring marriage and family therapist.

8           11. On or about March 14, 2011, Respondent documented a phone message from Patient  
9 A. In the message, Patient A canceled her upcoming appointment and said she would find her  
10 own therapist not related to Patient B.

11           12. On or about March 18, 2011, Respondent saw Patient A. Respondent documented  
12 that Patient A reported that Patient B was sleeping poorly, waking up in the middle of the night,  
13 but was sleeping fine with medication.

14           13. Over four years later, on or about May 8, 2015, Respondent saw Patient A. Patient A  
15 told Respondent that the Drug Enforcement Administration (DEA) had contacted her in June  
16 2014 and her dental license was suspended. Patient A also talked about her relationship with  
17 Patient B, and said that she had been seeing a licensed clinical psychologist, J.S., Ph.D. Patient A  
18 told Respondent that she had gone to various treatment centers and therapists for her substance  
19 abuse issues.

20           14. On or about May 8, 2015, Respondent wrote a letter to the Dental Board of California  
21 on behalf of Patient A, and gave the letter directly to Patient A.

22           15. On or about May 16, 2015, Respondent documented that Patient A had left her a  
23 voicemail. In her message, Patient A said that the Dental Board of Oregon may contact  
24 Respondent.

25           16. Respondent's records for Patient A includes a letter dated June 1, 2015, from  
26 treatment provider, J.S., Ph.D., noting that Patient A previously been diagnosed with Post-

27           <sup>2</sup> Conduct occurring more than seven (7) years from the filing date of this Accusation is for  
28 informational purposes only and is not alleged as a basis for disciplinary action.

1 Traumatic Stress Disorder (PTSD). Respondent's chart for Patient A also includes a letter dated  
2 June 9, 2015, from S.S., Ph.D., another treatment provider, stating that Patient A met the criteria  
3 for Post Traumatic Stress Disorder, Chronic, Barbiturate Use Disorder, In Sustained Remission,  
4 and Adjustment Disorder with mixed Anxiety and Depressed Mood. Patient A provided both of  
5 these letters to Respondent.

6 17. On or about June 5, 2015, Respondent saw Patient A and documented a chart note.  
7 The chart note for this date, which is handwritten, appears to document what Patient A told  
8 Respondent during this session. Respondent later told Board investigators that she had diagnosed  
9 Patient A with PTSD, based upon the other diagnoses from other treatment providers and from  
10 what Patient A told her. Respondent also told Board investigators that she did not offer any type  
11 of treatment to Patient A because Patient A did not want medication. Respondent failed to  
12 document that Patient A either declined medication or did not want to be treated with medication.  
13 Respondent's chart note fails to document any objective findings, assessment, or plan for the care  
14 and treatment of Patient A.

15 18. On or about June 26, 2015, Respondent saw Patient A and documented a chart note.  
16 The handwritten chart note for this date, again appears to document what Patient A told  
17 Respondent during this session. Respondent failed to document any objective findings,  
18 assessment, or plan for the care and treatment of Patient A.

19 19. On or about June 30, 2015 and July 17, 2015, Respondent sent Patient A letters,  
20 asking for payment for services provided.

21 20. On or about July 17, 2015, Respondent documented in her chart for Patient A that she  
22 sent Patient A a termination letter, and that she spoke to a risk manager at her medical malpractice  
23 insurance company. Respondent advised the risk manager that Patient A had threatened to file a  
24 complaint with the Medical Board, and the risk manager advised that Respondent terminate  
25 Patient A. Respondent's notes reflect that the termination letter was mailed on or about July 18,  
26 2015. In her termination letter, Respondent failed to include referrals to other psychiatric  
27 resources.

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1 21. Respondent committed gross negligence in her care and treatment of Patient A for  
2 failing to document an assessment, the bases for her assessment, or any treatment options and  
3 responses to treatment in her care.

4 **SECOND CAUSE FOR DISCIPLINE**  
5 **(Repeated Negligent Acts)**

6 22. Respondent has further subjected her Physician's and Surgeon's Certificate No.  
7 G55560 to disciplinary action under sections 2227 and 2234, as defined by section 2234,  
8 subdivision (c), of the Code, in that she committed repeated negligent acts in her care and  
9 treatment of Patient A, as more particularly alleged hereinafter:

10 a. Paragraphs 9 through 21, above, are hereby incorporated by reference and re-  
11 alleged as if fully set forth herein.

12 b. Respondent failed to provide other psychiatric resources when terminating the  
13 physician/patient relationship with Patient A.

14 **THIRD CAUSE FOR DISCIPLINE**  
15 **(Failure to Maintain Adequate and Accurate Records)**

16 23. Respondent has further subjected her Physician's and Surgeon's Certificate No.  
17 G55560 to disciplinary action under sections 2227 and 2234, as defined by section 2266, of the  
18 Code, in that she failed to maintain adequate and accurate medical records in her care and  
19 treatment of Patient A, as more particularly alleged in paragraphs 9 through 22, above, which are  
20 hereby incorporated by reference and re-alleged as if fully set forth herein.

21 **PRAYER**

22 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
23 and that following the hearing, the Medical Board of California issue a decision:

24 1. Revoking or suspending Physician's and Surgeon's Certificate No. G55560, issued to  
25 Respondent Laura Seed, M.D.;

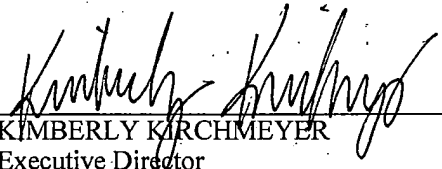
26 2. Revoking, suspending or denying approval of Respondent Laura Seed, M.D.'s  
27 authority to supervise physician assistants, pursuant to section 3527 of the Code, and advanced  
28 practice nurses;

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3. Ordering Respondent Laura Seed, M.D., if placed on probation, to pay the Board the costs of probation monitoring; and

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

DATED: July 9, 2018

  
KIMBERLY KIRCHMEYER  
Executive Director  
Medical Board of California  
State of California  
*Complainant*

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