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8 *Attorneys for Complainant*

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

14 In the Matter of the Petition to Revoke Probation  
Against:

15 **RAJINDER SINGH RANDHAWA, M.D.**  
16 7720 Tennis Ct.  
Antelope, CA 95843

17 **Physician's and Surgeon's Certificate No. C 50081**

18 Respondent.

Case No. 800-2020-067421

PETITION TO REVOKE  
PROBATION

19  
20  
21  
22 Complainant alleges:

23 **PARTIES**

24 1. Christine J. Lally ("Complainant") brings this Petition to Revoke Probation solely in  
25 her official capacity as the Interim Executive Director of the Medical Board of California,  
26 Department of Consumer Affairs ("Board").

27 2. On or about October 3, 1997, the Medical Board of California issued Physician's and  
28 Surgeon's Certificate Number C 50081 to Rajinder Singh Randhawa, M.D. ("Respondent"). That

1 Certificate was in effect at all times relevant to the charges brought herein and will expire on  
2 March 31, 2021, unless renewed.

3 3. In a disciplinary action titled *In the Matter of the Accusation Against Rajinder Singh*  
4 *Randhawa, M.D.*, Case No. 02-2013-232013, the Board issued a decision, effective May 22,  
5 2015, in which Respondent's Physician's and Surgeon's Certificate was revoked. However, the  
6 revocation was stayed and Respondent's Physician's and Surgeon's Certificate was placed on  
7 probation for a period of five (5) years with certain terms and conditions. A copy of that decision  
8 is attached as Exhibit A and is incorporated by reference.

9 **JURISDICTION**

10 4. This Petition to Revoke Probation is brought before the Board, under the authority of  
11 the following laws. All section references are to the Business and Professions Code unless  
12 otherwise indicated.

13 5. Section 2004 of the Code states, in pertinent part:

14 The Board shall have the responsibility for the following:

15 (a) The enforcement of the disciplinary and criminal provisions of the Medical  
16 Practice Act,

17 (b) The administration and hearing of disciplinary actions,

18 (c) Carrying out disciplinary actions appropriate to findings made by a panel or an  
19 administrative law judge,

20 (d) Suspending, revoking, or otherwise limiting certificates after the conclusion of  
21 disciplinary actions,

22 ...

23 6. Section 2227 of the Code states in pertinent part:

24 (a) A licensee whose matter has been heard by an administrative law judge of  
25 the Medical Quality Hearing Panel as designated in Section 11371 of the Government  
26 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:

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

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

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

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

7 (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.

8 (b) Any matter heard pursuant to subdivision (a), except for warning letters,  
9 medical review or advisory conferences, professional competency examinations,  
10 continuing education activities, and cost reimbursement associated therewith that are  
11 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.

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

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

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

17 ...

18 **CAUSE TO REVOKE PROBATION**

19 (Failure to Pay Probation Monitoring Costs)

20 8. At all times after the effective date of Respondent's probation, Condition Number 13,  
21 PROBATION MONITORING COSTS, stated in relevant part:

22 "Respondent shall pay the costs associated with probation monitoring each and every  
23 year of probation, as designated by the Board, which may be adjusted on an annual basis.

24 Such costs shall be payable to the Medical Board of California and delivered to the Board  
25 or its designee no later than January 31 of each calendar year."

26 9. At all times after the effective date of Respondent's probation, Condition Number 11,  
27 VIOLATION OF PROBATION, stated in relevant part:

28 ///

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

8 10. Respondent's probation is subject to revocation because he failed to comply with  
9 Probation Condition 13, referenced above, by repeatedly failing to pay probation monitoring costs  
10 to the Board. The facts and circumstances regarding this violation are as follows:

11 A. The circumstances set forth in Paragraph 3 are incorporated by reference as if fully  
12 set forth herein.

13 B. On or about May 27, 2015, Respondent signed and dated a document entitled  
14 "Acknowledgement of Decision" as part of the intake procedures with the Board's probation  
15 department. The document stated that the Board had provided Respondent with a copy of the  
16 decision in MBC Case No. 02-2013-232013 and that his certificate was being placed on probation  
17 for a period of five years. The document further stated,

18 "Your signature in the space provided below acknowledges that you received a copy  
19 of said decision and that I explained all the terms and conditions of your probation to you  
20 and addressed any questions you had about the conditions of your probation."

21 C. On or about May 4, 2015, the Board sent a letter to Respondent stating that he would  
22 owe \$2,520.00 in prorated probation monitoring costs for 2015 and that the total was due on or  
23 before January 31, 2016. He was also notified in the same letter that while the total probation  
24 monitoring costs for the current calendar year were \$4,106.00, the amount might vary from year  
25 to year. On or about December 21, 2016, the Board sent an e-mail to Respondent notifying him  
26 that he had not paid anything for 2015 or 2016 probation monitoring costs. Respondent  
27 responded that he needed a payment plan and that he would begin paying \$400.00 a month  
28

1 towards his outstanding probation monitoring costs. At the time, Respondent owed \$6,187.00 in  
2 probation monitoring costs to the Board for 2015 and 2016.

3 D. On or about March 14, 2017, the Board received a \$400.00 payment from Respondent  
4 towards his outstanding probation monitoring costs. On or about March 30, 2017, during an  
5 interview with Respondent, a probation monitor informed Respondent that he would need to  
6 make approximately 15 monthly payments of \$400.00 to pay off the 2015 and 2016 probation  
7 monitoring costs and that Respondent would incur an additional \$4,537.00 in probation  
8 monitoring costs for 2017. Respondent stated that he intended to make larger payments but that  
9 he would continue to make a minimum payment of \$400.00 a month.

10 E. On or about September 30, 2019, Respondent was notified by the Board that his  
11 probation file was being assigned to a new probation monitor. On or about November 21, 2019,  
12 the Board's new probation monitor interviewed Respondent at his place of employment.  
13 Respondent admitted that he was not in compliance with all of his terms and conditions of  
14 probation and admitted that he was behind on his probation monitoring costs. The probation  
15 monitor informed the Respondent that he owed the Board \$15,473.00 for outstanding probation  
16 monitoring costs. The Respondent stated that he understood that he owed the Board \$15,473.00.  
17 On or about December 30, 2019, the Board's probation monitor sent Respondent a letter stating  
18 that Respondent's current balance for outstanding probation monitoring costs was \$15,473.00 and  
19 that he was to make payment by the end of February 2020.

20 F. On or about March 24, 2020, the Board's probation monitor interviewed Respondent  
21 at Respondent's place of employment. Respondent admitted that he did not comply with all of  
22 his terms and conditions of probation and he admitted that he was behind on his probation  
23 monitoring costs. The probation monitor informed the Respondent that he now owed \$21,904.00  
24 in probation monitoring costs and that payment was due in full before May 22, 2020, the  
25 scheduled expiration of his probation term. The probation monitor explained to Respondent that  
26 failure to pay his probation costs would result in further discipline against Respondent's license  
27 and the Respondent stated that he understood the consequences of not paying probation  
28 monitoring

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costs. As of May 8, 2020, Respondent still owes the Board \$21,904.00 in outstanding probation monitoring costs.

**DISCIPLINE CONSIDERATIONS**

11. To determine the degree of discipline, if any, to be imposed on Respondent, Complainant alleges that on or about May 22, 2015, in a prior disciplinary action entitled *In the Matter of the Accusation Against Rajinder Singh Randhawa, M.D.* before the Medical Board of California, in Case No. 02-2013-232013, Respondent’s license was revoked, with the revocation stayed, for Respondent improperly presenting an altered pocket license and for falsely representing that his medical license was current when in fact it was delinquent to a prospective employer. Prior to accepting the Board’s stipulation for a Decision and Order in this matter, Respondent agreed that if the Board ever petitioned for revocation of probation, “all of the charges, and allegations contained in Accusation No. 02-2013-232013, shall be deemed true, correct, and fully admitted by Respondent for the purposes of that proceeding...” That decision is now final and is incorporated by reference as if fully set forth.

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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 the probation that was granted by the Medical Board of California in Case No. 02-2013-232013 and imposing the disciplinary order that was stayed thereby revoking Physician's and Surgeon's Certificate No. C 50081 issued to Rajinder Singh Randhawa, M.D.;
2. Revoking, suspending or denying approval of Rajinder Singh Randhawa, M.D.'s authority to supervise physician's assistants, pursuant to section 3527 of the Code;
3. If placed on probation, ordering Rajinder Singh Randhawa, M.D., to pay the Board the costs of probation monitoring; and,
4. Taking such other and further action as deemed necessary and proper.

DATED: May 20, 2020

  
 CHRISTINE J. LALLY  
 Interim Executive Director  
 Medical Board of California  
 Department of Consumer Affairs  
 State of California  
 Complainant

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# **Exhibit A**

**Decision and Order**

**Medical Board of California Case No. 02-2013-232013**



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

In the Matter of the Accusation )  
Against: )  
)  
)  
RAJINDER SINGH RANDHAWA, M.D. )  
)  
Physician's and Surgeon's )  
Certificate No. C 50081 )  
)  
Respondent )  
\_\_\_\_\_ )

Case No. 02-2013-232013

DECISION AND ORDER

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 May 22, 2015.

IT IS SO ORDERED: April 24, 2015.

MEDICAL BOARD OF CALIFORNIA

*Dev Gnanadev MD*

Dev Gnanadev, M.D., Chair  
Panel B

MEDICAL BOARD OF CALIFORNIA  
I do hereby certify that this document is a true  
and correct copy of the original on file in this  
office.

*S. Woods*  
\_\_\_\_\_  
Signature

For Custodian of Records

Title

*5/8/2020*  
\_\_\_\_\_  
Date

1 KAMALA D. HARRIS  
Attorney General of California  
2 ROBERT MCKIM BELL  
Supervising Deputy Attorney General  
3 JOHN S. GATSCHET  
Deputy Attorney General  
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6 Sacramento, CA 94244-2550  
Telephone: (916) 445-5230  
7 Facsimile: (916) 327-2247  
*Attorneys for Complainant*  
8

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

12 In the Matter of the Accusation Against:

Case No. 02-2013-232013

13 RAJINDER SINGH RANDHAWA, M.D.

OAH No. 2014060483

14  
15 7720 Tennis Court.  
Antelope, California 95843

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

16  
17 Physician's and Surgeon's Certificate C 50081,  
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  
24 Board of California ("Board"). She brought this action solely in her official capacity and is  
25 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by  
26 John S. Gatschet, Deputy Attorney General.

27 2. Respondent Rajinder Singh Randhawa, M.D. ("Respondent") is representing himself  
28 in this proceeding and has chosen not to exercise his right to be represented by counsel.



1 CULPABILITY

2 9. Respondent understands and agrees that the charges and allegations in Accusation  
3 No. 02-2013-232013, if proven at a hearing, constitute cause for imposing discipline upon his  
4 Physician's and Surgeon's Certificate.

5 10. For the purpose of resolving the Accusation without the expense and uncertainty of  
6 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual  
7 basis for the charges in the Accusation, and that Respondent hereby gives up his right to contest  
8 those charges.

9 11. Respondent agrees that if he ever petitions for early termination or modification of  
10 probation, or if the Board ever petitions for revocation of probation, all of the charges, and  
11 allegations contained in Accusation No. 02-2013-232013, shall be deemed true, correct, and fully  
12 admitted by Respondent for purposes of that proceeding or any other licensing proceeding  
13 involving respondent in the State of California.

14 12. Respondent agrees that his Physician's and Surgeon's Certificate is subject to  
15 discipline and he agrees to be bound by the Board's probationary terms as set forth in the  
16 Disciplinary Order below.

17 RESERVATION

18 13. The admissions made by Respondent herein are only for the purposes of this  
19 proceeding, or any other proceedings in which the Medical Board of California or other  
20 professional licensing agency is involved, and shall not be admissible in any other criminal or  
21 civil proceeding.

22 CONTINGENCY

23 14. This stipulation shall be subject to approval by the Medical Board of California.  
24 Respondent understands and agrees that counsel for Complainant and the staff of the Medical  
25 Board of California may communicate directly with the Board regarding this stipulation and  
26 settlement, without notice to or participation by Respondent. By signing the stipulation,  
27 Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the  
28 stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this

1 stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of  
2 no force or effect, except for this paragraph, it shall be inadmissible in any legal action between  
3 the parties, and the Board shall not be disqualified from further action by having considered this  
4 matter.

5 15. The parties understand and agree that Portable Document Format (PDF) and facsimile  
6 copies of this Stipulated Settlement and Disciplinary Order, including Portable Document Format  
7 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

8 16. In consideration of the foregoing admissions and stipulations, the parties agree that  
9 the Board may, without further notice or formal proceeding, issue and enter the following  
10 Disciplinary Order:

11 **DISCIPLINARY ORDER**

12 **IT IS HEREBY ORDERED THAT** Physician's and Surgeon's Certificate No. C 50081  
13 issued to Respondent Rajinder Singh Randhawa, M.D. is revoked. However, the revocation is  
14 stayed and Respondent is placed on probation for five (5) years on the following terms and  
15 conditions.

16 1. **COMMUNITY SERVICE - FREE SERVICES.** Within 60 calendar days of the  
17 effective date of this Decision, Respondent shall submit to the Board or its designee for prior  
18 approval a community service plan in which Respondent shall within the first 2 years of  
19 probation, provide 100 hours of free services (e.g., medical or nonmedical) to a community or  
20 non-profit organization. If the term of probation is designated for 2 years or less, the community  
21 service hours must be completed not later than 6 months prior to the completion of probation.

22 Prior to engaging in any community service Respondent shall provide a true copy of the  
23 Decision(s) to the chief of staff, director, office manager, program manager, officer, or the chief  
24 executive officer at every community or non-profit organization where Respondent provides  
25 community service and shall submit proof of compliance to the Board or its designee within 15  
26 calendar days. This condition shall also apply to any change(s) in community service.

27 Community service performed prior to the effective date of the Decision shall not be  
28 accepted in fulfillment of this condition.

1           2.    PROFESSIONALISM PROGRAM ("ETHICS" COURSE). Within 60 calendar  
2 days of the effective date of this Decision, Respondent shall enroll in a professionalism program,  
3 that meets the requirements of Title 16, California Code of Regulations (C.C.R.) section 1358.  
4 Respondent shall participate in and successfully complete that program. Respondent shall  
5 provide any information and documents that the program may deem pertinent. Respondent shall  
6 successfully complete the classroom component of the program not later than six (6) months after  
7 Respondent's initial enrollment, and the longitudinal component of the program not later than the  
8 time specified by the program, but no later than one (1) year after attending the classroom  
9 component. The professionalism program shall be at Respondent's expense and shall be in  
10 addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

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

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

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

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

28           4.    SUPERVISION OF PHYSICIAN ASSISTANTS. During probation, Respondent is

1 prohibited from supervising physician assistants.

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

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

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

10 7. GENERAL PROBATION REQUIREMENTS.

11 Compliance with Probation Unit

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

14 Address Changes

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

20 Place of Practice

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

24 License Renewal

25 Respondent shall maintain a current and renewed California physician's and surgeon's  
26 license.

27 Travel or Residence Outside California

28 Respondent shall immediately inform the Board or its designee, in writing, of travel to any

1 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than thirty  
2 (30) calendar days.

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

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

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

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

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

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

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



1           10. COMPLETION OF PROBATION. Respondent shall comply with all financial  
2 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the  
3 completion of probation. Upon successful completion of probation, Respondent's certificate shall  
4 be fully restored.

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

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

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

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ACCEPTANCE

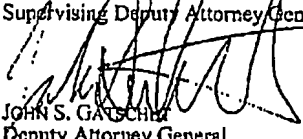
I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: March 12, 2015  
RAJINDER SINGH RANDHAWA, M.D.  
Respondent

ENDORSEMENT

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

Dated: 3/12/15

Respectfully submitted,  
KAMALA D. HARRIS  
Attorney General of California  
ROBERT MCKIN BELL  
Supervising Deputy Attorney General  
  
JOHN S. GATSCHEK  
Deputy Attorney General  
Attorneys for Complainant

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**Exhibit A**

**Accusation No. 02-2013-232013**

1 KAMALA D. HARRIS  
Attorney General of California  
2 ROBERT MCKIM BELL  
Supervising Deputy Attorney General  
3 JOHN S. GATSCHE  
Deputy Attorney General  
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7 Facsimile: (916) 327-2247  
*Attorneys for Complainant*

FILED  
STATE OF CALIFORNIA  
MEDICAL BOARD OF CALIFORNIA  
SACRAMENTO April 2, 2014  
BY *[Signature]* ANALYST

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

12 In the Matter of the Accusation Against: . . . Case No. 02-2013-232013

13 **RAJINDER SINGH RANDHAWA, M.D.**  
7720 Tennis Court  
14 Antelope, California 95843  
15 Physician's and Surgeon's Certificate C 50081  
16 Respondent.

**ACCUSATION**

18 Complainant alleges:

19 **PARTIES**

- 20 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official  
21 capacity as the Executive Director of the Medical Board of California ("Board").  
22 2. On October 3, 1997, the Board issued Physician's and Surgeon's Certificate number C  
23 50081 to Rajinder Singh Randhawa, M.D. ("Respondent"). That license expired on March 31,  
24 2011. On April 1, 2011, Respondent's license went into delinquent status. On April 23, 2011,  
25 the Respondent renewed his delinquent license. His license again expired on March 31, 2013.  
26 On April 1, 2013, Respondent's license went into delinquent status. On May 11, 2013, the  
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1 Respondent renewed his delinquent license. His license is currently in full force and effect and  
2 will expire on March 31, 2015, unless renewed.

3 JURISDICTION

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

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

11 5. Section 119 of the Code states:

12 "Any person who does any of the following is guilty of a misdemeanor:

13 " ...

14 "(f) Photographs, photostats, duplicates, manufactures, or in any way reproduces any  
15 license or facsimile thereof in a manner that it could be mistaken for a valid license, or displays or  
16 has in his or her possession any such photograph, Photostat, duplicate, reproduction, or facsimile  
17 unless authorized by this code.

18 " ...

19 "As used in this section, "license" includes "certificate," "permit," "authority," and  
20 "registration" or any other indicia giving authorization to engage in a business or profession  
21 regulated by this code or referred to in Section 1000 or 3600."

22 6. Section 2234 of the Code, states:

23 "The board shall take action against any licensee who is charged with unprofessional  
24 conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not  
25 limited to, the following:

26 "(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the  
27 violation of, or conspiring to violate any provision of this chapter.

28 " ...



1           13. On April 30, 2013, the NSH medical staff coordinator requested additional  
2 documentation directly from the Respondent. That same day, the Respondent faxed the NSH  
3 medical staff coordinator a "pocket license" which had an expiration date of March 31, 2015.

4           14. On May 9, 2013, the NSF medical staff coordinator contacted the Medical Board to  
5 verify that the Respondent's license was valid. The NSF medical staff coordinator was informed  
6 by the Medical Board that the Respondent's license was delinquent.

7           15. On May 10, 2013, the NSF medical staff coordinator contacted the Medical Board  
8 and spoke to a regulatory analyst. The regulatory analyst again verified that the account was  
9 delinquent. The NSF medical staff coordinator informed the regulatory analyst that she had  
10 received a "pocket license" from the Respondent that had an expiration date of March 31, 2015.  
11 The regulatory analyst confirmed that the Medical Board had not issued Respondent a "pocket  
12 license" with an expiration date of March 31, 2015. The regulatory analyst concluded the  
13 expiration date had been altered.

14           16. After speaking to the Medical Board, the NSF medical staff coordinator informed her  
15 supervisor that Respondent's medical license was delinquent. The supervisor contacted the  
16 Respondent and informed him that his license was delinquent and that he could not start  
17 employment at NSH without a valid medical license.

18           17. On May 10, 2013, after being contacted by the supervisor, the Respondent renewed  
19 his medical license by making payment on-line to the Medical Board. The Medical Board sent  
20 the Respondent a valid "pocket license" with an expiration date of March 31, 2015.

21           18. On August 29, 2013, the Respondent admitted he received the valid "pocket license"  
22 from the Medical Board by mail approximately a week after May 10, 2013.

23           19. The Respondent is subject to disciplinary action because he sent a fraudulent "pocket  
24 license" to the Napa State Hospital in such a manner that it was mistakenly received as a valid  
25 license.

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1 SECOND CAUSE FOR DISCIPLINE

2 (Signing a false document directly related to the practice of medicine)

3 20. Respondent is subject to disciplinary action under section 2261 in that he signed a  
4 medical staff application which contained false information regarding his medical license. The  
5 circumstances are as follows:

6 21. Complainant realleges paragraphs 9 through 18, those paragraphs are incorporated by  
7 reference as if fully set forth herein.

8 22. On March 28, 2013, PHS sent Respondent an e-mail containing a blank copy of the  
9 NSH medical staff application.

10 23. On April 30, 2013, the Respondent faxed the completed NSH medical staff  
11 application to the NSH medical staff coordinator at NSH. On page three of Respondent's NSH  
12 medical staff application, under the section titled MEDICAL/PSYCHOLOGY  
13 LICENSURE/REGISTRATIONS, the Respondent's medical license number, C50081, was listed  
14 as having an expiration date of March 31, 2015.

15 24. On page five of the NSH medical staff application, under section XVI, titled  
16 ATTESTATION QUESTIONS, the following is listed under "A":

17 "Has your license to practice in any jurisdiction, your Drug Enforcement Administration  
18 (DEA) registration or any applicable narcotic registration ever been denied, limited,  
19 restricted, suspended, revoked, not renewed, or subject to probationary conditions, or have  
20 you voluntarily or involuntarily relinquished any such license or registration or voluntarily  
accepted any such actions or conditions, or have you been fined or received a letter of  
reprimand or is such action pending?"

21 Next to question "A", the answer "NO," is marked with an "x."

22 25. On page six of the NSH medical staff application, the following is listed:

23 "I hereby affirm that the information in this Section XVI, Attestation Questions, and any  
24 addenda thereto is true, current, correct, and complete to the best of my knowledge and  
25 belief and is furnished in good faith. I understand that material, omissions or  
26 misrepresentations may result in denial of my reapplication or termination of my  
privileges, employment, or physician participation agreement."

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1 Respondent's name is printed in bold face print directly underneath the affirmation paragraph.  
2 The Respondent's signature is directly underneath the Respondent's printed name. On the  
3 signature line, directly next to Respondent's signature, is a typed date of April 24, 2013. On  
4 January 8, 2014, the Respondent admitted that the signature located on page six is his signature  
5 and admitted that he personally signed the document.

6 26. On page seven of the NSH medical staff application, the following is listed:

7 "I hereby affirm that the information submitted in this reapplication and addenda thereto  
8 (including my curriculum vitae if attached) is true, current, correct, and complete to the  
9 best of my knowledge and belief and is furnished in good faith. I understand that material  
10 omissions or misrepresentations may result in denial of my reapplication or termination of  
11 my privileges, employment of physician participation agreement. A photocopy of this  
12 document shall be as effective as the original, however, current dates are required on pages  
13 5 and 6.

12 Respondent's name is printed in bold face print directly underneath the affirmation paragraph.

13 The Respondent's signature is directly underneath the Respondent's printed name. On the  
14 signature line, directly next to Respondent's signature, is a typed date of April 24, 2013. On  
15 January 8, 2014, the Respondent admitted that the signature located on page seven is his signature  
16 and admitted that he personally signed the document.

17 27. The Respondent is subject to disciplinary action because he signed a document  
18 directly related to the practice of medicine that falsely represented that he possessed a valid  
19 medical license.

20 **THIRD CAUSE FOR DISCIPLINE**

21 **(Dishonest and Corrupt Acts)**

22 28. Respondent is subject to disciplinary action under section 2234(e) in that he  
23 committed dishonest and corrupt acts which are substantially related to the qualifications,  
24 functions, or duties of a physician and surgeon. The circumstances are as follows:

25 29. Complainant realleges paragraphs 9 through 27, those paragraphs are incorporated by  
26 reference as if fully set forth herein.

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PRAAYER

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 Number C 50081, issued to Rajinder Singh Randhawa, M.D.;
2. Revoking, suspending or denying approval his authority to supervise physician's assistants, pursuant to section 3527 of the Code;
3. If placed on probation, ordering him to pay the Medical Board of California the costs of probation monitoring; and
4. Taking such other and further action as deemed necessary and proper.

DATED: April 2, 2014



KIMBERLY KIRCHMEYER  
Executive Director  
Medical Board of California  
Department of Consumer Affairs  
State of California

*Complainant*

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