

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

In the Matter of the Accusation)
Against:)
ROBERT G. TRAHMS, M.D.)
Physician & Surgeon Cert. No. C-24815)
Respondent)
_____)

No. D1-90-5992

DECISION

The attached Stipulated Settlement and Disciplinary Order in case number D1-90-5992 is hereby adopted by the Division of Medical Quality of the Medical Board of California as its decision in the above entitled matter.

This Decision shall become effective on July 29, 1998

It is so Ordered July 22, 1998

DIVISION OF MEDICAL QUALITY
MEDICAL BOARD OF CALIFORNIA

By Carole Hurvitz, M.D.
CAROLE HURVITZ, M.D.
Chairperson, Panel B

1 DANIEL E. LUNGREN, Attorney General
of the State of California
2 GAIL M. HEPPELL
Supervising Deputy Attorney General
3 ISA R. RODRIGUEZ, State Bar No. 104838
Deputy Attorney General
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5 Sacramento, California 94244-2550
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6 Attorneys for Complainant
7
8

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

12 In the Matter of the Accusation) Case No. D1-90-5992
Against:)
13)
ROBERT G. TRAHMS, M.D.)
14 599 Sir Francis Drake Boulevard) STIPULATED SETTLEMENT
Greenbrae, California 94904-1732) AND
15) DISCIPLINARY ORDER
Physician's and Surgeon's)
16 Certificate No. C24815)
17 Respondent.)
18

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

22 1. Complainant, Ron Joseph, is the Executive Director
23 of the Medical Board of California, Department of Consumer
24 Affairs ("Board") and is represented by Daniel E. Lungren,
25 Attorney General of the State of California by Isa R. Rodriguez,
26 Deputy Attorney General.

27 ///

1 2. Robert G. Trahms, M.D. (hereinafter "Respondent")
2 is represented in this matter by attorney Stuart Hanlon, of
3 Tamburello, Hanlon & Waggner, whose address is 214 Duboce Avenue,
4 San Francisco, CA 94103-1099. Respondent has counseled with his
5 attorney concerning the effect of this stipulation which
6 Respondent has carefully read and fully understands.

7 3. Respondent has received and read the Accusation
8 and Petition to Revoke Probation and the First Supplemental
9 Accusation and Petition to Revoke Probation which are presently
10 on file and pending in Case Number D1-90-5992 before the Division
11 of Medical Quality of the Medical Board of California, Department
12 of Consumer Affairs (hereinafter the "Division"), copies of which
13 are attached as Exhibit A and incorporated herein by reference.

14 4. Respondent understands the nature of the charges
15 alleged in the Accusation and Petition to Revoke Probation and
16 the First Supplemental Accusation and Petition to Revoke
17 Probation and that, if proven at hearing, such charges and
18 allegations would constitute cause for imposing discipline upon
19 Respondent's license issued by the Board and for revoking the
20 probation previously imposed by the Board.

21 5. Respondent and his counsel are aware of each of
22 Respondent's rights, including the right to a hearing on the
23 charges and allegations, the right to confront and cross-examine
24 witnesses who would testify against Respondent, the right to
25 testify and present evidence on his own behalf, as well as to the
26 issuance of subpoenas to compel the attendance of witnesses and
27 the production of documents, the right to contest the charges and

1 allegations, and other rights which are accorded Respondent
2 pursuant to the California Administrative Procedure Act (Gov.
3 Code, § 11500 et seq.) and other applicable laws, including the
4 right to seek reconsideration, review by the superior court, and
5 appellate review.

6 7. For the purpose of resolving Accusation and
7 Petition to Revoke Probation No. D1-90-5992 and First
8 Supplemental Accusation and Petition to Revoke Probation No. D1-
9 90-5992 without the expense and uncertainty of further
10 proceedings, Respondent agrees that, at a hearing, complainant
11 could establish a factual basis for the charges in the Accusation
12 and Petition to Revoke Probation and in the First Supplemental
13 Accusation and Petition to Revoke Probation. Respondent admits to
14 the criminal conviction and to underlying facts on which that
15 conviction is based. Respondent hereby gives up his right to
16 contest that cause for discipline exists based on those charges
17 and agrees to surrender his certificate for the Division's formal
18 acceptance.

19 8. Respondent understands that by signing this
20 stipulation he is enabling the Division of Medical Quality to
21 issue its order accepting the surrender of his license without
22 further process. Respondent understands and agrees that Board
23 staff and counsel for complainant may communicate directly with
24 the Division regarding this stipulation, without notice to or
25 participation by Respondent or his counsel. In the event that
26 this stipulation is rejected for any reason by the Division, it
27 will be of no force or effect for either party. The Division


1 Division, I will lose all rights and privileges to practice as a
2 physician and surgeon in the State of California and I also will
3 cause to be delivered to the Division both my license and wallet
4 certificate before the effective date of the decision.

5 DATED: 5-28-98.

6
7 
8 Robert G. Trahms
9 Respondent

10 I concur in the stipulation.

11
12 DATED: 6/1/98.

13 TAMBURELLO, HANLON & WAGGNER
14
15 
16 Stuart Hanlon
17 Attorneys for Respondent

18 DATED: June 11, 1998.

19
20 DANIEL E. LUNGREN, Attorney General
21 of the State of California


22 
23 Isa R. Rodriguez
24 Deputy Attorney General
25 Attorneys for Complainant
26
27

EXHIBIT A

1 DANIEL E. LUNGREN, Attorney General
of the State of California
2 GAIL M. HEPPELL
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FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO July 1 19 97
BY Janilda Baldo ANALYST

6 Attorneys for Complainant
7

8 **BEFORE THE**
9 **DIVISION OF MEDICAL QUALITY**
10 **MEDICAL BOARD OF CALIFORNIA**
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

11 In the Matter of the Accusation) Case No. D1-90-5992
Against:)
12)
13 **ROBERT G. TRAHMS, M.D.**) **ACCUSATION AND PETITION**
599 Sir Francis Drake Boulevard) **TO REVOKE PROBATION**
14 Greenbrae, California 94904-1732)
California Physician's and)
15 Surgeon's Certificate No. C24815)
16)
Respondent.)
17)

18
19 The Complainant alleges:

20 **PARTIES**

21 1. Complainant, Ronald Joseph, is the Executive
22 Director of the Medical Board of California (hereinafter the
23 "Board") and brings this accusation and petition to revoke
24 probation solely in his official capacity.

25 2. On or about January 10, 1963, Physician's and
26 Surgeon's Certificate No. C24815 was issued by the Board to
27 Robert G. Trahms, M.D. (hereinafter "respondent").

1 On September 23, 1976, an accusation was filed against
2 respondent. On April 26, 1979, a decision became effective
3 revoking respondent's certificate. On April 26, 1979, a stay
4 order was issued in superior court. On August 17, 1979, the
5 April 26, 1979 decision became effective and the license was
6 revoked.

7 On February 19, 1985, respondent filed a petition for
8 reinstatement of revoked certificate. On August 16, 1985 a
9 decision became effective that granted the petition placing the
10 respondent on five years probation. On September 25, 1989, a
11 petition for termination of probation was filed. On January 18,
12 1990 a decision became effective which terminated respondent's
13 probation.

14 On July 25, 1994, the Board filed an accusation against
15 respondent's certificate. On June 13, 1996, a decision became
16 effective which revoked respondent's certificate. The revocation
17 was stayed and respondent was placed on five (5) years probation.
18 On August 1, 1996, respondent's certificate to practice medicine
19 was suspended due to his failure of the oral clinical examination
20 given on July 12, 1996.

21 Unless renewed, the certificate will expire on May 31, 1998.

22 **JURISDICTION**

23 3. This accusation is brought before the Division of
24 Medical Quality of the Medical Board of California, Department of
25 Consumer Affairs (hereinafter the "Division"), under the
26 authority of the following sections of the California Business
27 and Professions Code (hereinafter "Code"):

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A. Section 2227 of the Code provides:

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

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

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

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

"(4) Be publicly reprimanded by the division.

"(5) Have any other action taken in relation to discipline as the Division or an administrative law judge may deem proper.

"(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical review or advisory conferences, or other matters made confidential or privileged by existing law, is deemed public, and shall be made available to the public by the board."

B. Section 2234 of the Code provides:

"The Division of Medical Quality shall take action against any licensee who is charged with unprofessional

1 conduct. In addition to other provisions of this
2 article, unprofessional conduct includes, but is not
3 limited to, the following:

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

7 (b) Gross negligence.

8 (c) Repeated negligent acts.

9 (d) Incompetence.

10 (e) The commission of any act involving dishonesty or
11 corruption which is substantially related to the
12 qualifications, functions, or duties of a physician and
13 surgeon.

14 (f) Any action or conduct which would have warranted
15 the denial of a certificate."

16 C. Section 2266 of the Code provides:

17 "The failure of a physician and surgeon to
18 maintain adequate and accurate records relating to the
19 provision of services to their patients constitutes
20 unprofessional conduct."

21 D. Section 125.3 of the Code provides, in part:

22 "(a) Except as otherwise provided by law, in any
23 order issued in resolution of a disciplinary proceeding
24 before any board within the department or before the
25 Osteopathic Medical Board, the board may request the
26 administrative law judge to direct a licentiate found
27 to have committed a violation or violations of the

1 licensing act to pay a sum not to exceed the reasonable
2 costs of the investigation and enforcement of the case.

3 ""

4 D. Section 118(b) of the Code provides, in part, that
5 the expiration of a license shall not deprive the Board of
6 jurisdiction to proceed with a disciplinary action during
7 the time within which the license may be renewed, restored,
8 or reinstated.

9 E. Section 2428 of the Code provides, in part,
10 that a license which has expired may be renewed any
11 time within five years after expiration.

12 F. Section 16.01 of the 1996/1997 Budget Act of
13 the State of California provides, in pertinent part,
14 that: (a) no funds appropriated by this act may be
15 expended to pay any Medi-Cal claim for any service
16 performed by a physician while that physician's license
17 is under suspension or revocation due to a disciplinary
18 action of the Medical Board of California; and, (b) no
19 funds appropriated by this act may be expended to pay
20 any Medi-Cal claim for any surgical service or other
21 invasive procedure performed on any Medi-Cal
22 beneficiary by a physician if that physician has been
23 placed on probation due to a disciplinary action of the
24 Medical Board of California related to the performance
25 of that specific service or procedure on any patient,
26 except in any case where the board makes a
27 determination during its disciplinary process that

1 there exist compelling circumstances that warrant
2 continued Medi-Cal reimbursement during the
3 probationary period.

4 PATIENT G.N.

5 4. In or about January 1994, patient G.N. began as
6 respondent's patient. Patient G.N. saw respondent twice a month
7 for three months and then three times a month until June 1994.
8 Patient G.N. saw respondent in individual therapy and group
9 therapy. Patient, G.N. became respondent's patient because she
10 was depressed and needed to be evaluated for SSI benefits.

11 FIRST CAUSE FOR DISCIPLINE

12 5. Respondent Trahms is subject to disciplinary action
13 under Business and Professions Code section 2234(b) on the
14 grounds of unprofessional conduct in that he was grossly
15 negligent in the care of patient G.N. as follows:

16 a. Failed to document an initial psychiatric
17 assessment consisting of a comprehensive history, formal
18 mental status examination, a formulation of the case and
19 formal diagnosis, leading to an initial treatment plan that
20 identifies the goals of treatment and treatment modalities
21 selected.

22 b. Failed to document subsequent visits with patient
23 G.N. by not preparing a dated, legible and signed progress
24 note recording patient complaints, objective findings, an
25 assessment of the response to treatment and any revisions in
26 diagnosis or treatment plan.

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1 c. Failed to transcribe the tape recorded interviews.

2 d. Failed to provide in the patient's records a
3 clinical assessment to explain the rationale for the
4 multiple medications prescribed.

5 e. Failed to acquire a medical history at the time of
6 initial assessment and failed to make reasonable efforts to
7 acquire the medical records.

8 f. Failed to document on the patient's medical record
9 any medical, medication or drug allergy history, or
10 substance abuse history, or to establish the safety of any
11 medication prescribed for the patient.

12 g. Respondent prescribed two sedative-hypnotics,
13 Chloral Hydrate and Triazolam, concurrently, when there is
14 no medical indication for using two sedative-hypnotics.

15 h. Respondent prescribed sedative-hypnotics (Chloral
16 Hydrate and Triazolam) to patient G.N. which can exacerbate
17 psychiatric depression.

18 i. Respondent inappropriately prescribed Thioridazine
19 which is generally confined to psychotic disorders.

20 j. Respondent inappropriately prescribed Thioridazine
21 and Imipramine.

22 k. Respondent inappropriate prescribed Metoclopramide
23 which causes or exacerbates mental depression.

24 l. Respondent inappropriately prescribed Carbamazepine
25 for sleep.

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1 m. Respondent increased the patients dose of
2 Imipramine to 200 mg. and within nine days, increased the
3 dosage again to 250 mg.

4 n. Respondent inappropriately prescribed Venlafaxine
5 for "pep and energy" instead of discontinuing the sedatives-
6 hypnotics and Thioridazine already prescribed to the patient
7 and switch to a less sedating antidepressant.

8 o. Failed to evaluate and monitor the patient with
9 appropriate physical, diagnostic and laboratory examinations
10 to establish the appropriateness and safety of treatment as
11 follows:

12 A. Failed to acquire thyroid function tests
13 in a 48 year old woman complainant of depression.

14 B. Failed to acquire a baseline EKG in a
15 woman over 40 years old with hypertension and
16 placed on a tricyclic antidepressant in
17 progressively increasing doses to 250 mg.

18 C. Failed to utilize blood
19 Imipramine/Desipramine levels to establish the
20 appropriate dose of Imipramine.

21 D. Failed to acquire a baseline CBC prior to
22 initiating Carbamazepine, and failed to acquire
23 subsequent CBCs to monitor for potential
24 hematologic toxicities.

25 E. Failed to acquire Carbamazepine blood
26 levels, particularly relevant given the co-
27 administration of Diltiazem.

1 F. Failed to acquire a diastolic blood
2 pressure at the time he initiated a prescription
3 for Venlafaxine, a medication associated with a
4 risk of sustained increase in supine diastolic
5 blood pressure.

6 SECOND CAUSE FOR DISCIPLINE

7 5. Respondent Trahms is subject to disciplinary action
8 under Business and Professions Code section 2234 in conjunction
9 with section 2266 on the grounds of unprofessional conduct in
10 that he failed to maintain adequate and accurate records relating
11 to the provision of services to patient G.N. as set forth in
12 paragraphs 4(a) through 4(f).

13 THIRD CAUSE FOR DISCIPLINE

14 (Repeated Negligent Acts)

15 6. Respondent Trahms is subject to disciplinary
16 action under section 2234(c) of the Business and Professions Code
17 on the grounds of unprofessional conduct in that while practicing
18 as a psychiatrist in Greenbrae, California, he committed repeated
19 negligent acts by departing from the standard of practice as set
20 forth in paragraphs 4(a) through 4(o) above.

21 FOURTH CAUSE FOR DISCIPLINE

22 (Incompetence)

23 7. Respondent Trahms is subject to disciplinary
24 action under section 2234(d) of the Business and Professions Code
25 on the grounds of unprofessional conduct in that while practicing
26 as a psychiatrist in Greenbrae, California, he was incompetent in
27 his treatment of the patient G.N. in that he lacked the knowledge

1 and ability in the use of medications, their indications and
2 contraindications, their effects and side effects, their risks
3 and their interactions with each other.

4 FIFTH CAUSE FOR DISCIPLINE

5 8. Respondent Trahms is subject to disciplinary action
6 under Business and Professions Code section 2234(a) on the
7 grounds of unprofessional conduct as defined in section 2241 of
8 the Code in that he prescribed to patient G.N., an addict,
9 Chloral Hydrate, Triazolam, Thioridazine, Imipramine,
10 Metoclopramide, Carbamazepine, and Venlafaxine.

11 UNDERCOVER OPERATION

12 9. Beginning on or about January 23, 1995, the Bureau
13 of Medi-Cal Fraud conducted an undercover operation of
14 respondent. The undercover operator known as patient Winona
15 Newhall was seen by respondent from January 23, 1995 to on or
16 about April 12, 1995. Patient W.N. was seen by respondent in
17 both individual and group sessions. Respondent prescribed
18 Buspar, Klonopin and Venlafaxine to undercover operator patient
19 W.N.

20 SIXTH CAUSE FOR DISCIPLINE

21 10. Respondent Trahms is subject to disciplinary
22 action under Business and Professions Code section 2234(b) on the
23 grounds of unprofessional conduct in that he was grossly
24 negligent in the care of patient W.N. as follows:

25 a. Failed to determine that the patient had any
26 psychiatric disorder prior to prescribing an anxiolytic
27 medication, Buspar.

1 that effective August 1, 1996, respondent was to cease the
2 practice of medicine which included not seeing patients, and no
3 prescribing, administering or dispensing of any medications.
4 Respondent indicated that he understood that he was suspended
5 from the practice of medicine.

6 On or about August 28, 1996, Investigator Gremminger
7 received information from a pharmacist that respondent was
8 calling in prescriptions for numerous patients during the month
9 of August.

10 EIGHTH CAUSE FOR DISCIPLINE

11 13. Respondent Trahms is subject to disciplinary
12 action under Business and Professions Code section 2234(a) on the
13 grounds of unprofessional conduct in that he violated the
14 provisions of section 2306 of the code by engaging in the
15 practice of medicine during the time his certificate was
16 suspended as set forth in paragraph 12 above and as evidenced by
17 the following prescriptions:

18 LONG'S DRUGS - GREENBRAE

19	<u>DATE</u>	<u>PRES. #</u>	<u>DRUG</u>	<u>AMOUNT</u>
20	<u>Patient R.A.</u>			
21	8/3/96	767285	Flurazepam 30 mg.	30 tabs
22	8/3/96	767286	Clonidine 100 mg.	100 tabs
23	8/3/96	767287	Carisoprodol 350 mg.	100 tabs
24	<u>Patient C.B.</u>			
25	8/8/96	818196	Paxil 20 mg.	65 tabs
26	8/8/96	768341	Triazolam 250 mg.	15 tabs
27	8/8/96	768342	Diazepam 5 mg.	30 tabs

1	<u>Patient S.C.</u>			
2	8/20/96	770742	Alprazolam 1 mg.	100 tabs
3	<u>LONG'S DRUGS - MILL VALLEY</u>			
4	<u>DATE</u>	<u>PRES. #</u>	<u>DRUG</u>	<u>AMOUNT</u>
5	<u>Patient R.A.</u>			
6	8/3/96	397796	Chloral Hydrate 500 mg.	240 ml.
7	8/3/96	397797	Diphenoxylate	100 tabs
8	8/3/96	397798	Diazepam 10 mg.	100 tabs
9	<u>Patient C.D.</u>			
10	8/2/96	397625	Erythromycin 500 mg.	30 tabs
11	<u>Patient S.A.</u>			
12	8/6/96	398151	Triazolam 250 mg.	30 tabs
13	8/6/96	398152	Temazepam 30 mg.	30 tabs
14	8/6/96	398153	Prozac 20 mg.	60 tabs
15	8/6/96	398152	Risperdal 1 mg.	60 tabs
16	<u>LONG'S DRUGS - SAN ANSELMO</u>			
17	<u>DATE</u>	<u>PRES. #</u>	<u>DRUG</u>	<u>AMOUNT</u>
18	<u>Patient C.M.</u>			
19	8/8/96	815741	Chloral Hydrate 500 mg.	60 tabs
20	8/8/96	815740	Diazepam 10 mg.	50 tabs
21	8/8/96	815738	Doxepin 50 mg.	100 tabs
22	<u>Patient J.C.</u>			
23	8/3/96	814883	Diazepam 10 mg.	60 tabs
24	8/3/96	814885	Darvon-N 100	100 tabs
25	8/3/96	814884	Temazepam 30 mg.	30 tabs
26	8/10/96	816055	Darvon-N 100	100 tabs
27	8/10/96	816056	Chloral Hydrate 500 mg.	100 tabs

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PETITION TO REVOKE PROBATION

1. Paragraphs 1 through 13 of the above accusation are incorporated by reference as if fully set forth.

2. Grounds exist to revoke respondent's probation and impose the order of revocation of respondent's license in that he failed to comply with the terms and conditions of his probation in the decision rendered June 13, 1996 as follows:

a. He failed to obey all federal, state and local laws and all rules governing the practice of medicine in California.

PRAYER

WHEREFORE, the complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Division issue a decision:

1. Revoking the probation and reimposing the revocation of Physician's and Surgeon's Certificate Number C24815, heretofore issued to respondent Robert G. Trahms, M.D.;

2. Revoking, suspending or denying approval of the respondent's authority to supervise physician's assistants, pursuant to Business and Professions Code section 3527;


3. Ordering respondent to pay the Division the actual and reasonable costs of the investigation and enforcement of this case and probation monitoring costs;

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4. Taking such other and further action as the
Division deems necessary and proper.

DATED: July 1, 1997



RONALD JOSEPH
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California

Complainant

1 DANIEL E. LUNGREN, Attorney General
of the State of California
2 GAIL M. HEPPELL
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STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO May 22 19 98
BY [Signature] ANALYST

6 Attorneys for Complainant
7

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9 DIVISION OF MEDICAL QUALITY
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10 DEPARTMENT OF CONSUMER AFFAIRS
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12)
13 ROBERT G. TRAHMS, M.D.) FIRST SUPPLEMENTAL
599 Sir Francis Drake Boulevard) ACCUSATION AND PETITION
14 Greenbrae, California 94904-1732) TO REVOKE PROBATION
15 Physician's and Surgeon's)
Certificate No. C24815)
16)
Respondent.)
17)

18 Ron Joseph, for further causes for discipline alleges:

19 1. Complainant, Ron Joseph, makes and files this
20 First Supplemental Accusation solely in his official capacity as
21 Executive Director of the Medical Board of California.

22 2. The allegations, contained in paragraph 2 through
23 13 of the Accusation heretofore filed are realleged and
24 incorporated herein by reference as if fully set forth.

25 JURISDICTION

26 3. Section 2236 provides, in pertinent part, that the
27 conviction of any offense substantially related to the

1 qualifications, functions, and duties of a physician and surgeon
2 constitutes unprofessional conduct.

3 NINTH CAUSE FOR DISCIPLINE

4 4. On or about June 20, 1997, respondent was
5 convicted of violating Welfare and Institutions Code section
6 14107 in that he presented fraudulent claims for reimbursement to
7 Medi-Cal. Such conviction was by way of a guilty plea to a
8 misdemeanor violation of Welfare and Institutions Code section
9 14107 and occurred in the Marin County Courts in a case entitled
10 *People v. Robert George Trahms*, Case No. CR 088352A. As a result
11 of this conviction, respondent was placed on probation for three
12 years, ordered to pay restitution, terminated as a Medi-Cal and
13 Medicare provider, ordered to surrender his license, and ordered
14 to take no actions as a health care provider

15 5. The facts underlying the above-entitled criminal
16 conviction were that from in or about 1994 through in or about
17 1996, respondent submitted billings for reimbursement to Medi-Cal
18 for individual psychotherapy sessions which, in fact, were group
19 therapy sessions. The reimbursement by Medi-Cal is higher for
20 individual therapy sessions than it is for group sessions. Thus,
21 respondent had fraudulently increased his income from the Medi-
22 Cal programs in violation of Welfare and Institutions code
23 section 14107.

24 6. Respondent's conduct as set forth in paragraphs 4
25 and 5, above, has subjected his certificate to discipline
26 pursuant to Code section 2236 in that he was convicted of a crime

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1 substantially related to the qualifications, functions, and
2 duties of a physician and surgeon.

3 TENTH CAUSE FOR DISCIPLINE

4 7. Respondent's conduct as set forth in paragraphs 4
5 and 5, above, has exposed his certificate to discipline pursuant
6 to Code section 2234(e) in that the fraudulent Medi-Cal claims he
7 submitted for reimbursement constituted corrupt or dishonest
8 acts.

9 FIRST SUPPLEMENTAL PETITION TO REVOKE PROBATION

10 1. Paragraphs 1 through 7 of the above First
11 Supplemental Accusation are incorporated by reference as if fully
12 set forth.

13 2. Grounds exist to revoke respondent's probation and
14 impose the order of revocation of respondent's license in that he
15 failed to comply with the terms and conditions of his probation
16 in the decision rendered June 13, 1996, as follows:

17 a. He failed to obey all federal, state and local
18 laws and all rules governing the practice of medicine in
19 California.

20 PRAYER

21 **WHEREFORE**, the complainant requests that a hearing be
22 held on the matters herein alleged, and that following the
23 hearing, the Division issue a decision:

24 1. Revoking the probation and reimposing the
25 revocation of Physician's and Surgeon's Certificate
26 Number C24815, heretofore issued to respondent Robert G. Trahms,
27 M.D.;

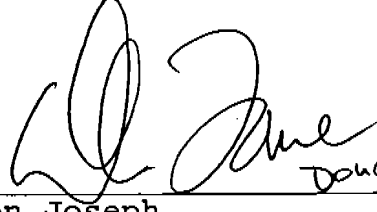
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2. Revoking, suspending or denying approval of the respondent's authority to supervise physician's assistants, pursuant to Business and Professions Code section 3527;

3. Ordering respondent to pay the Division the actual and reasonable costs of the investigation and enforcement of this case and probation monitoring costs;

4. Taking such other and further action as the Division deems necessary and proper.

DATED: May 22, 1998



Douglas Lane
Deputy Director
for

Ron Joseph
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California

Complainant

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