

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

In the Matter of the First Amended)
Accusation Against:)
)
)
PATRICK GOLDEN, M.D.)
)
Physician's and Surgeon's)
Certificate No. G51665)
)
Respondent.)
_____)

File No. 08-2006-175011

DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Division of Medical Quality of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on January 28, 2008.

IT IS SO ORDERED December 27, 2007.

MEDICAL BOARD OF CALIFORNIA

By: Cesar A. Aristeiguieta, M.D.
Cesar A. Aristeiguieta, M.D., F.A.C.E.P.
Chair
Panel A
Division of Medical Quality

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 GAIL M. HEPPELL
Supervising Deputy Attorney General
3 JENNEVEE H. DE GUZMAN, State Bar No. 197817
Deputy Attorney General
4 California Department of Justice
1300 I Street, Suite 125
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7 Attorneys for Complainant
8

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

13 In the Matter of the First Amended Accusation
14 Against:
15 PATRICK GOLDEN, MD
1275 E. Spruce Avenue #103
16 Fresno, California 93720
17 Physician and Surgeon's Certificate No. G51665
18 Respondent.

Case No. 08 2006 175011
OAH No. N-2007060582

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

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

21 **PARTIES**

- 22 1. Barbara Johnston (Complainant) is the Executive Director of the Medical
23 Board of California. She brought this action solely in her official capacity and is represented in
24 this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Jennevee H.
25 de Guzman, Deputy Attorney General.
- 26 2. Patrick Golden, MD (Respondent) is represented in this proceeding by
27 attorney Lawrence E. Wayte, Esq., whose address is McCormick Barstow LLP, 5 River Park
28 Place East, Fresno, California 93720.

1 3. On or about November 21, 1983, the Medical Board of California issued
2 Physician and Surgeon's Certificate No. G51665 to Patrick Golden, MD (Respondent). The
3 Physician and Surgeon's Certificate was in full force and effect at all times relevant to the charges
4 brought in First Amended Accusation No. 08 2006 175011 and will expire on March 31, 2009,
5 unless renewed.

6 **JURISDICTION**

7 4. First Amended Accusation No. 08 2006 175011 was filed before the
8 Division of Medical Quality (Medical Board of California) for the Medical Board of California,
9 Department of Consumer Affairs, and is currently pending against Respondent. The First
10 Amended Accusation and all other statutorily required documents were properly served on
11 Respondent on or about October 3, 2007, and a copy of First Amended Accusation No. 08 2006
12 175011 is attached as Exhibit A and incorporated herein by reference.

13 **ADVISEMENT AND WAIVERS**

14 5. Respondent has carefully read, discussed with counsel, and fully
15 understands the charges and allegations in First Amended Accusation No. 08 2006 175011.
16 Respondent has also carefully read, discussed with counsel, and fully understands the effects of
17 this Stipulated Settlement and Disciplinary Order.

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

25 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
26 each and every right set forth above.

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28 ///

1 **CULPABILITY**

2 8. Respondent admits the truth of each and every charge and allegation in
3 First Amended Accusation No. 08 2006 175011.

4 9. Respondent agrees that his Physician and Surgeon's Certificate is subject
5 to discipline and he agrees to be bound by the Division of Medical Quality (Medical Board of
6 California)'s imposition of discipline as set forth in the Disciplinary Order below.

7 **CONTINGENCY**

8 10. This stipulation shall be subject to approval by the Division of Medical
9 Quality. Respondent understands and agrees that counsel for Complainant and the staff of the
10 Medical Board of California may communicate directly with the Medical Board of California
11 regarding this stipulation and settlement, without notice to or participation by Respondent or his
12 counsel. By signing the stipulation, Respondent understands and agrees that he may not
13 withdraw his agreement or seek to rescind the stipulation prior to the time the Medical Board of
14 California considers and acts upon it. If the Medical Board of California fails to adopt this
15 stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of
16 no force or effect, except for this paragraph, it shall be inadmissible in any legal action between
17 the parties, and the Medical Board of California shall not be disqualified from further action by
18 having considered this matter.

19 **OTHER MATTERS**

20 11. The parties understand and agree that facsimile copies of this Stipulated
21 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
22 force and effect as the originals.

23 **DISCIPLINARY ORDER**

24 In consideration of the foregoing admissions and stipulations, the parties agree
25 that the Medical Board of California may, without further notice or formal proceeding, issue and
26 enter the following Disciplinary Order:

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1 IT IS HEREBY ORDERED that Physician and Surgeon's Certificate No. G51665
2 issued to Respondent Patrick Golden, MD (Respondent) is revoked. However, the revocation is
3 stayed and Respondent is placed on probation for five (5) years on the following terms and
4 conditions.

5 1. PRESCRIBING PRACTICES COURSE Within 60 calendar days of the
6 effective date of this Decision, respondent shall enroll in a course in prescribing practices, at his
7 expense, approved in advance by the Division or its designee. Failure to successfully complete
8 the course during the first 6 months of probation is a violation of probation.

9 A prescribing practices course taken after the acts that gave rise to the charges in
10 the First Amended Accusation, but prior to the effective date of the Decision may, in the sole
11 discretion of the Division or its designee, be accepted towards the fulfillment of this condition if
12 the course would have been approved by the Division or its designee had the course been taken
13 after the effective date of this Decision.

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

17 2. CLINICAL TRAINING PROGRAM Within 60 calendar days of the
18 effective date of this Decision, respondent shall enroll in a clinical training or educational
19 program equivalent to the Physician Assessment and Clinical Education Program (PACE)
20 offered at the University of California - San Diego School of Medicine ("Program").

21 The Program shall consist of a Comprehensive Assessment program comprised of
22 a two-day assessment of respondent's physical and mental health; basic clinical and
23 communication skills common to all clinicians; and medical knowledge, skill and judgment
24 pertaining to respondent's specialty or sub-specialty, and at minimum, a 40 hour program of
25 clinical education in the area of practice in which respondent was alleged to be deficient and
26 which takes into account data obtained from the assessment, Decision(s), Accusation(s), and any
27 other information that the Division or its designee deems relevant. Respondent shall pay all
28 expenses associated with the clinical training program.

1 Based on respondent's performance and test results in the assessment and clinical
2 education, the Program will advise the Division or its designee of its recommendation(s) for the
3 scope and length of any additional educational or clinical training, treatment for any medical
4 condition, treatment for any psychological condition, or anything else affecting respondent's
5 practice of medicine. Respondent shall comply with Program recommendations.

6 At the completion of any additional educational or clinical training, respondent
7 shall submit to and pass an examination. The Program's determination whether or not
8 respondent passed the examination or successfully completed the Program shall be binding.

9 Respondent shall complete the Program not later than six months after
10 respondent's initial enrollment unless the Division or its designee agrees in writing to a later time
11 for completion.

12 Failure to participate in and complete successfully all phases of the clinical
13 training program outlined above is a violation of probation.

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

24 The Division or its designee shall provide the approved monitor with copies of the
25 Decision(s) and Accusation(s), and a proposed monitoring plan. Within 15 calendar days of
26 receipt of the Decision(s), Accusation(s), and proposed monitoring plan, the monitor shall submit
27 a signed statement that the monitor has read the Decision(s) and Accusation(s), fully understands
28 the role of a monitor, and agrees or disagrees with the proposed monitoring plan. If the monitor

1 disagrees with the proposed monitoring plan, the monitor shall submit a revised monitoring plan
2 with the signed statement.

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

8 The monitor shall submit a quarterly written report to the Division or its designee
9 which includes an evaluation of respondent's performance, indicating whether respondent's
10 practices are within the standards of practice of medicine or billing, or both, and whether
11 respondent is practicing medicine safely, billing appropriately or both.

12 It shall be the sole responsibility of respondent to ensure that the monitor submits
13 the quarterly written reports to the Division or its designee within 10 calendar days after the end
14 of the preceding quarter.

15 If the monitor resigns or is no longer available, respondent shall, within 5 calendar
16 days of such resignation or unavailability, submit to the Division or its designee, for prior
17 approval, the name and qualifications of a replacement monitor who will be assuming that
18 responsibility within 15 calendar days. If respondent fails to obtain approval of a replacement
19 monitor within 60 days of the resignation or unavailability of the monitor, respondent shall be
20 suspended from the practice of medicine until a replacement monitor is approved and prepared to
21 assume immediate monitoring responsibility. Respondent shall cease the practice of medicine
22 within 3 calendar days after being so notified by the Division or designee.

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

1 Failure to maintain all records, or to make all appropriate records available for
2 immediate inspection and copying on the premises, or to comply with this condition as outlined
3 above is a violation of probation.

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

7 5. QUARTERLY DECLARATIONS Respondent shall submit quarterly
8 declarations under penalty of perjury on forms provided by the Division, stating whether there
9 has been compliance with all the conditions of probation. Respondent shall submit quarterly
10 declarations not later than 10 calendar days after the end of the preceding quarter.

11 6. PROBATION UNIT COMPLIANCE Respondent shall comply with the
12 Division's probation unit. Respondent shall, at all times, keep the Division informed of
13 respondent's business and residence addresses. Changes of such addresses shall be immediately
14 communicated in writing to the Division or its designee. Under no circumstances shall a post
15 office box serve as an address of record, except as allowed by Business and Professions Code
16 section 2021(b).

17 Respondent shall not engage in the practice of medicine in respondent's place of
18 residence. Respondent shall maintain a current and renewed California physician's and
19 surgeon's license.

20 Respondent shall immediately inform the Division, or its designee, in writing, of
21 travel to any areas outside the jurisdiction of California which lasts, or is contemplated to last,
22 more than 30 calendar days.

23 7. INTERVIEW WITH THE DIVISION, OR ITS DESIGNEE Respondent
24 shall be available in person for interviews either at respondent's place of business or at the
25 probation unit office, with the Division or its designee, upon request at various intervals, and
26 either with or without prior notice throughout the term of probation.

27 8. RESIDING OR PRACTICING OUT-OF-STATE In the event respondent
28 should leave the State of California to reside or to practice, he shall notify the Division or its

1 designee in writing 30 calendar days prior to the dates of departure and return. Non-practice is
2 defined as any period of time exceeding 30 calendar days in which respondent is not engaging in
3 any activities defined in Sections 2051 and 2052 of the Business and Professions Code.

4 All time spent in an intensive training program outside the State of California
5 which has been approved by the Division or its designee shall be considered as time spent in the
6 practice of medicine within the State. A Board-ordered suspension of practice shall not be
7 considered as a period of non-practice. Periods of temporary or permanent residence or practice
8 outside California will not apply to the reduction of the probationary term. Periods of temporary
9 or permanent residence or practice outside California will relieve respondent of the responsibility
10 to comply with the probationary terms and conditions with the exception of this condition and
11 the following terms and conditions of probation: Obey All Laws; Probation Unit Compliance;
12 and Cost Recovery.

13 Respondent's license shall be automatically canceled if respondent's periods of
14 temporary or permanent residence or practice outside California total two years. However,
15 respondent's license shall not be canceled as long as respondent is residing and practicing
16 medicine in another state of the United States and is on active probation with the medical
17 licensing authority of that state, in which case the two year period shall begin on the date
18 probation is completed or terminated in that state.

19 9. FAILURE TO PRACTICE MEDICINE - CALIFORNIA RESIDENT

20 In the event respondent resides in the State of California and for any reason
21 respondent stops practicing medicine in California, respondent shall notify the Division or its
22 designee in writing within 30 calendar days prior to the dates of non-practice and return to
23 practice. Any period of non-practice within California, as defined in this condition, will not
24 apply to the reduction of the probationary term and does not relieve respondent of the
25 responsibility to comply with the terms and conditions of probation. Non-practice is defined as
26 any period of time exceeding 30 calendar days in which respondent is not engaging in any
27 activities defined in sections 2051 and 2052 of the Business and Professions Code.

28 All time spent in an intensive training program which has been approved by the

1 Division or its designee shall be considered time spent in the practice of medicine. For purposes
2 of this condition, non-practice due to a Board-ordered suspension or in compliance with any
3 other condition of probation, shall not be considered a period of non-practice.

4 Respondent's license shall be automatically canceled if respondent resides in
5 California and for a total of two years, fails to engage in California in any of the activities
6 described in Business and Professions Code sections 2051 and 2052.

7 10. COMPLETION OF PROBATION Respondent shall comply with all
8 financial obligations (e.g., cost recovery, restitution, probation costs) not later than 120 calendar
9 days prior to the completion of probation. Upon successful completion of probation,
10 respondent's certificate shall be fully restored.

11 11. VIOLATION OF PROBATION Failure to fully comply with any term or
12 condition of probation is a violation of probation. If respondent violates probation in any respect,
13 the Division, after giving respondent notice and the opportunity to be heard, may revoke
14 probation and carry out the disciplinary order that was stayed. If an Accusation, Petition to
15 Revoke Probation, or an Interim Suspension Order is filed against respondent during probation,
16 the Division shall have continuing jurisdiction until the matter is final, and the period of
17 probation shall be extended until the matter is final.

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

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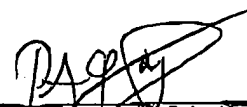
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1 13. PROBATION MONITORING COSTS Respondent shall pay the costs
2 associated with probation monitoring each and every year of probation as designated by the
3 Division, which are currently set at \$3,173.00, but may be adjusted on an annual basis. Such
4 costs shall be payable to the Medical Board of California and delivered to the Division or its
5 designee no later than January 31 of each calendar year. Failure to pay costs within 30 calendar
6 days of the due date is a violation of probation.

ACCEPTANCE

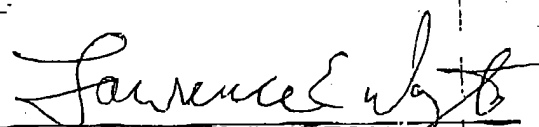
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8 I have carefully read the above Stipulated Settlement and Disciplinary Order and
9 have fully discussed it with my attorney, Lawrence E. Wayte, Esq. I understand the stipulation
10 and the effect it will have on my Physician and Surgeon's Certificate. I enter into this Stipulated
11 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
12 bound by the Decision and Order of the Division of Medical Quality, Medical Board of
13 California.

14 DATED: 10/8/07

15
16 
17 PATRICK GOLDEN, MD (Respondent)
18 Respondent

19 I have read and fully discussed with Respondent Patrick Golden, M.D. the terms
20 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
21 Order. I approve its form and content.

22 DATED: 10/8/07

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24 
25 LAWRENCE E. WAYTE, ESQ.
26 Attorney for Respondent

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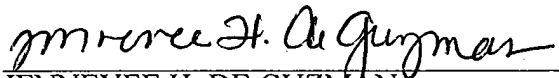
ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Division of Medical Quality, Medical Board of California of the Department of Consumer Affairs.

DATED: 10-9-07

EDMUND G. BROWN JR., Attorney General
of the State of California

GAIL M. HEPPELL
Supervising Deputy Attorney General


JENNEVEE H. DE GUZMAN
Deputy Attorney General

Attorneys for Complainant

Exhibit A

First Amended Accusation No. 08 2006 175011

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 GAIL M. HEPPELL
Supervising Deputy Attorney General
3 JENNEVEE H. DE GUZMAN, State Bar No. 197817
Deputy Attorney General
4 California Department of Justice
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 327-1145
Facsimile: (916) 327-2247

7 Attorneys for Complainant
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FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO October 19 20 07
BY Walter M. Oa. ANALYST

10 **BEFORE THE**
11 **DIVISION OF MEDICAL QUALITY**
12 **MEDICAL BOARD OF CALIFORNIA**
13 **DEPARTMENT OF CONSUMER AFFAIRS**
14 **STATE OF CALIFORNIA**

15 In the Matter of the First Amended Accusation
16 Against:

17 PATRICK GOLDEN, M.D.
1275 E. Spruce Avenue #103
18 Fresno, California 93720

19 Physician and Surgeon's Certificate No. G51665

20 Respondent.

Case No. 08-2006-175011

**FIRST AMENDED
ACCUSATION**

21 Complainant alleges:

PARTIES

22 1. Barbara Johnston (Complainant) brings this First Amended Accusation
23 solely in her official capacity as the Executive Director of the Medical Board of California,
24 Department of Consumer Affairs.

25 2. On or about November 21, 1983, the Medical Board of California issued
26 Physician and Surgeon's Certificate No. G51665 to Patrick Golden, M.D. (Respondent). The
27 Physician and Surgeon's Certificate was in full force and effect at all times relevant to the charges
28 brought herein and will expire on March 31, 2009, unless renewed.

1 JURISDICTION

2 3. This First Amended Accusation is brought before the Division of Medical
3 Quality for the Medical Board of California, Department of Consumer Affairs (Medical Board of
4 California), under the authority of the following laws. All section references are to the Business
5 and Professions Code unless otherwise indicated.

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

10 5. Section 2234 of the Code states:

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

14 ***

15 "(b) Gross negligence."

16 6. Section 2004 of the Code states:

17 "The Division of Medical Quality shall have the responsibility for the following:

18 "(a) The enforcement of the disciplinary and criminal provisions of the Medical
19 Practice Act.

20 "(b) The administration and hearing of disciplinary actions.

21 "(c) Carrying out disciplinary actions appropriate to findings made by a medical
22 quality review committee, the division, or an administrative law judge.

23 "(d) Suspending, revoking, or otherwise limiting certificates after the conclusion
24 of disciplinary actions.

25 "(e) Reviewing the quality of medical practice carried out by physician and
26 surgeon certificate holders under the jurisdiction of the board."

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CAUSE FOR DISCIPLINE
(Gross Negligence)
[Bus. & Prof. Code, § 2234(b)]

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2
3 7. Respondent is subject to disciplinary action under section 2234,
4 subdivision (b), of the Code in that he was grossly negligent in his care of patient A.B.¹ The
5 circumstances are as follows:

6 8. A.B. was under respondent's care from approximately April 28, 1992,
7 through April 21, 2005. In 1995, A.B. was diagnosed with atrial fibrillation.

8 9. In August 2004, A.B. was first noted to have trouble finishing her
9 sentences.

10 10. On October 26, 2004, a CT scan demonstrated a 2.8 cm hematoma in the
11 right occipitoparietal lobe. Interventricular hemorrhage was also noted and some small lacunar
12 infarcts were present in the right cerebellar lobe. Small cerebral infarcts were also evident. A.B.
13 took aspirin for her neurologic condition.

14 11. On December 31, 2004, A.B. was re-admitted to the hospital by Alan
15 Birnbaum, M.D. due to her complaints of confusion. A repeat CT scan of her head revealed the
16 presence of lacunar infarcts. Encephalomalacia of the right parietooccipital lobe at the site of the
17 previous hemorrhage were also present.

18 12. In January 2005, respondent prescribed aspirin and Plavix, both blood
19 thinning medications, to A.B. In April 2005, respondent added Coumadin, another blood
20 thinning medication, to her regimen of medication.

21 13. On April 11, 2005, A.B. saw respondent at an office visit with complaints
22 of disorientation and confusion. Respondent ordered A.B. to be admitted to the hospital, but did
23 not order a neurological examination. A.B. was instructed to have her prothrombin time checked
24 in two weeks. At this time, A.B. continued with her regimen of medication, including aspirin,
25 Plavix, and Coumadin.

26 _____
27 1. The patient's name is abbreviated herein to protect patient confidentiality. The patient's
28 full name and medical records will be provided upon receipt of a properly executed and served
Request for Discovery.

1 14. A.B. had also been taking Gingko, an herbal remedy, and respondent was
2 aware of this.

3 15. A.B. again saw respondent following her hospital discharge on April 21,
4 2005. He advised her to continue on her current regimen of medication, including the
5 combination of Coumadin, Plavix, and aspirin when her prothrombin result was 20.5 with an
6 INR of 2.1. Respondent did not perform a neurologic re-evaluation of A.B, i.e., no follow up on
7 prothrombin time, no follow up treatment, no consultation with a neurologist.

8 16. On April 27, 2005, A.B. was taken to the hospital where she complained
9 of weakness, collapsed, and lost consciousness. A.B. was then taken to the emergency room,
10 where she was found to have a large intracranial hemorrhage with a small left subdural
11 hematoma. A.B. fell into a coma and expired on this same date.

12 17. Respondent's placement of A.B. on anticoagulant therapy when there were
13 contraindications to such therapy, i.e., evidence of interventricular hemorrhage as well as
14 hemorrhage into the occipitoparietal lobe, and without adequate consultation with a neurologist
15 constitutes gross negligence.

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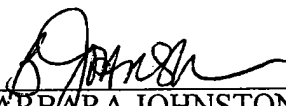
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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Division of Medical Quality issue a decision:

1. Revoking or suspending Physician and Surgeon's Certificate No. G51665, issued to Patrick Golden, M.D.;
2. Revoking, suspending or denying approval of Patrick Golden, M.D.'s authority to supervise physician's assistants, pursuant to section 3527 of the Code;
3. Ordering Patrick Golden, M.D. to pay the Division of Medical Quality, if placed on probation, the costs of probation monitoring; and
4. Taking such other and further action as deemed necessary and proper.

DATED: October 10, 2007



BARBARA JOHNSTON
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant