

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

In the Matter of the Accusation )  
Against: )

WILLIAM THOMAS CLUSIN, M.D. )

Case No. 8002015016506

Physician's and Surgeon's )  
Certificate No. G35051 )

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

DECISION

The attached Stipulated Surrender of License 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 JULY 10, 2017.

IT IS SO ORDERED JULY 3, 2017.

MEDICAL BOARD OF CALIFORNIA

By: \_\_\_\_\_

*Kimberly Kirchmeyer*  
Kimberly Kirchmeyer  
Executive Director

1 XAVIER BECERRA  
Attorney General of the State of California  
2 JANE ZACK SIMON  
Supervising Deputy Attorney General  
3 State Bar No. 116564  
455 Golden Gate Avenue, Suite 11000  
4 San Francisco, CA 94102  
Telephone: (415) 703-5544  
5 Fax: (415) 703-5480

6 *Attorneys for Complainant*  
7 *Medical Board of California*

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

12 In the Matter of the Accusation Against:

13 **William Thomas Clusin, M.D.**  
630 Prospect Street #7  
San Carlos, CA 94070

14 Physician's and Surgeon's Certificate No. G 35051

Case No.: 800-2015-016506

**STIPULATED SURRENDER OF  
LICENSE**

15  
16 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
17 proceeding, that the following matters are true:

18 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical  
19 Board of California. She brought this action solely in the official capacity, and is represented by  
20 Xavier Becerra, Attorney General of the State of California, by Jane Zack Simon, Supervising  
21 Deputy Attorney General.

22 2. Respondent William Thomas Clusin, M.D. (Respondent) is represented in this  
23 proceeding by Gregory Abrams, Abrams Health Law, 6045 Shirley Drive, Oakland, CA 94611.

24 3. On July 25, 1977, the Medical Board of California issued Physician's and  
25 Surgeon's Certificate No. G 35051 to Respondent. The certificate is renewed and current, but is  
26 suspended pursuant to a Stipulation and Order for Interim Suspension Order issued on June 5,  
27 2017.

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1           4.       Respondent has received, read, discussed with counsel and understands the  
2       Accusation which is presently on file and pending in case number 800-2015-016506  
3       (Accusation), a copy of which is attached as Exhibit A. Respondent also has carefully read,  
4       discussed with counsel and understands the effects of this Stipulated Surrender of License  
5       (Stipulation).

6           5.       Respondent is fully aware of his legal rights in this matter, including the right to a  
7       hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at  
8       his own expense; the right to confront and cross-examine the witnesses against him; the right to  
9       present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel  
10      the attendance of witnesses and the production of documents; the right to reconsideration and  
11      court review of an adverse decision; and all other rights accorded by the California  
12      Administrative Procedure Act and other applicable laws. Respondent voluntarily, knowingly, and  
13      intelligently waives and gives up each and every right set forth above.

14          6.       For the purpose of resolving the charges and allegations in the Accusation, without  
15      the expense and uncertainty of further proceedings, Respondent agrees that the Board has  
16      jurisdiction and cause to take action against his physician's and surgeon's certificate by virtue of  
17      the allegations set forth in the Accusation and pursuant to Business and Professions Code section  
18      822. Respondent wishes to surrender his certificate at this time.

19          7.       Pursuant to section 2224(b) of the Business and Professions Code, this Stipulation  
20      for Surrender of License shall be subject to the approval of the Board. Respondent understands  
21      and agrees that the Medical Board's staff and counsel for Complainant may communicate directly  
22      with the Board regarding this Stipulation without notice to or participation by Respondent or his  
23      counsel. By signing this Stipulation, Respondent understands and agrees that he may not  
24      withdraw his agreement or seek to rescind the Stipulation prior to the time the Board considers  
25      and acts upon it. In the event that this Stipulation is rejected for any reason by the Board, it will  
26      be of no force or effect for either party. The Board will not be disqualified from further action in  
27      this matter by virtue of its consideration of this Stipulation.

28      ///



1 privileges to practice as a physician and surgeon in the State of California and I also will cause to  
 2 be delivered to the Board any license and wallet certificate in my possession before the effective  
 3 date of the Decision.

4  
 5 DATED: 6/15/17 William Clusin  
 6 WILLIAM THOMAS CLUSIN, M.D.  
 7 Respondent

8 APPROVAL

9 I have fully discussed with Respondent William Thomas Clusin, M.D. the terms and  
 10 conditions and other matters contained in the above Stipulated Surrender of License and approve  
 11 its form and content.

12  
 13 DATED: 6/16/2017 [Signature]  
 14 GREGORY ABRAMS  
 15 Attorney for Respondent

16 ENDORSEMENT

17 The foregoing Stipulated Surrender of License is hereby respectfully submitted for  
 18 consideration by the Medical Board of California.

19  
 20  
 21 DATED: 6/19/2017 XAVIER BECERRA  
 22 Attorney General of the State of California  
 23 [Signature]  
 24 JANE ZACK SIMON  
 25 Supervising Deputy Attorney General  
 26 Attorneys for Complainant

# **EXHIBIT A**

1 XAVIER BECERRA  
Attorney General of California  
2 JANE ZACK SIMON  
Supervising Deputy Attorney General  
3 State Bar No. 116564  
4 455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004  
Telephone: (415) 703-5544  
5 Facsimile: (415) 703-5480  
E-mail: Janezack.simon@doj.ca.gov  
6 *Attorneys for Complainant*

FILED  
STATE OF CALIFORNIA  
MEDICAL BOARD OF CALIFORNIA  
SACRAMENTO June 9 20 17  
BY *[Signature]* ANALYST

7  
8 **BEFORE THE  
MEDICAL BOARD OF CALIFORNIA  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

9  
10 In the Matter of the Accusation Against:

Case No. 800-2015-016506

11 **William Thomas Clusin, M.D.**  
630 Prospect Street #7  
12 San Carlos, CA 94070

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

13 Physician's and Surgeon's Certificate  
14 No. G 35051,

Respondent.

15  
16 Complainant alleges:

17 **PARTIES**

18 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official  
19 capacity as the Executive Director of the Medical Board of California, Department of Consumer  
20 Affairs (Board).

21 2. On July 25, 1977, the Medical Board issued Physician's and Surgeon's Certificate  
22 Number G 35051 to William Thomas Clusin, M.D. (Respondent). The Physician's and Surgeon's  
23 Certificate is renewed and current, with an expiration date of March 31, 2019. The certificate is  
24 SUSPENDED pursuant to a Stipulation and Order for Interim Suspension Order issued on June 5,  
25 2017.

26 **JURISDICTION**

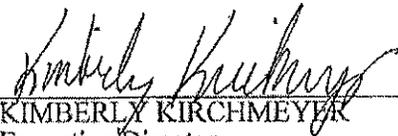
27 3. This Accusation is brought before the Board, under the authority of the following  
28 laws. All section references are to the Business and Professions Code unless otherwise indicated.



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

DATED: June 9, 2017

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

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