

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

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

PATRICIA A. COGHLAN, M.D.)

Case No. 8002014008700

**Physician's and Surgeon's)
Certificate No. A22797)**

Respondent)

DECISION

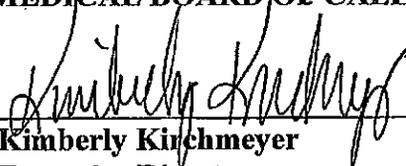
The attached Stipulated Surrender of License and Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on SEPTEMBER 21, 2017

IT IS SO ORDERED AUGUST 22, 2017

MEDICAL BOARD OF CALIFORNIA

By:



**Kimberly Kirchmeyer
Executive Director**

1 XAVIER BECERRA
Attorney General of California
2 JUDITH T. ALVARADO
Supervising Deputy Attorney General
3 BRIAN D. BILL
Deputy Attorney General
4 State Bar No. 239146
California Department of Justice
5 300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
6 Telephone: (213) 897-9474
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7 *Attorneys for Complainant*

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:

Case No. 800-2014-008700

13 **PATRICIA A. COGHLAN, M.D.**
14 **811 TACUBA ST**
15 **LOS ANGELES, CA**
16 **90065**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

17 **Physician's and Surgeon's Certificate No. A
22797,**

Respondent.

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

20 PARTIES

21 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board
22 of California (Board). She brought this action solely in her official capacity and is represented in
23 this matter by Xavier Becerra, Attorney General of the State of California, by Brian D. Bill,
24 Deputy Attorney General.

25 2. PATRICIA A. COGHLAN, M.D. (Respondent) is representing herself in this
26 proceeding and has chosen not to exercise her right to be represented by counsel.

27 3. On or about June 11, 1968, the Board issued Physician's and Surgeon's Certificate
28 No. A 22797 to PATRICIA A. COGHLAN, M.D. (Respondent). The Physician's and Surgeon's

1 Certificate expired on February 29, 2016, and has not been renewed.

2 JURISDICTION

3 4. Accusation No. 800-2014-008700 was filed before the (Board), and is currently
4 pending against Respondent. The Accusation and all other statutorily required documents were
5 properly served on Respondent May 9, 2017. Respondent timely filed her Notice of Defense
6 contesting the Accusation. A copy of Accusation No. 800-2014-008700 is attached as Exhibit A
7 and incorporated by reference.

8 ADVISEMENT AND WAIVERS

9 5. Respondent has carefully read, and understands the charges and allegations in
10 Accusation No. 800-2014-008700. Respondent also has carefully read, and understands the
11 effects of this Stipulated Surrender of License and Order.

12 6. Respondent is fully aware of her legal rights in this matter, including the right to a
13 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
14 her own expense; the right to confront and cross-examine the witnesses against her; the right to
15 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
16 compel the attendance of witnesses and the production of documents; the right to reconsideration
17 and court review of an adverse decision; and all other rights accorded by the California
18 Administrative Procedure Act and other applicable laws.

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

21 CULPABILITY

22 8. Respondent understands that the charges and allegations in Accusation No. 800-2014-
23 008700, if proven at a hearing, constitute cause for imposing discipline upon her Physician's and
24 Surgeon's Certificate.

25 9. For the purpose of resolving the Accusation without the expense and uncertainty of
26 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
27 basis for the charges in the Accusation and that those charges constitute cause for discipline.
28 Respondent hereby gives up her right to contest that cause for discipline exists based on those

1 charges.

2 10. Respondent understands that by signing this stipulation she enables the Board to issue
3 an order accepting the surrender of her Physician's and Surgeon's Certificate without further
4 process.

5 RESERVATION

6 11. The admissions made by Respondent herein are only for the purposes of this
7 proceeding, or any other proceedings in which the Medical Board of California or other
8 professional licensing agency is involved, and shall not be admissible in any other criminal or
9 civil proceeding.

10 CONTINGENCY

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

20 13. The parties understand and agree that Portable Document Format (PDF) and facsimile
21 copies of this Stipulated Surrender of License and Order, including Portable Document Format
22 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

23 14. In consideration of the foregoing admissions and stipulations, the parties agree that
24 the Board may, without further notice or formal proceeding, issue and enter the following Order:

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ORDER

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2 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 22797, issued
3 to Respondent PATRICIA A. COGHLAN, M.D., is surrendered and accepted by the Medical
4 Board of California.

5 1. The surrender of Respondent's Physician's and Surgeon's Certificate and the
6 acceptance of the surrendered license by the Board shall constitute the imposition of discipline
7 against Respondent. This stipulation constitutes a record of the discipline and shall become a part
8 of Respondent's license history with the Medical Board of California.

9 2. Respondent shall lose all rights and privileges as a Physician and Surgeon in
10 California as of the effective date of the Board's Decision and Order.

11 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
12 issued, her wall certificate on or before the effective date of the Decision and Order.

13 4. If Respondent ever files an application for licensure or a petition for reinstatement in
14 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
15 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
16 effect at the time the petition is filed, and all of the charges and allegations contained in
17 Accusation No. 800-2014-008700 shall be deemed to be true, correct and admitted by Respondent
18 when the Board determines whether to grant or deny the petition.

19 5. If Respondent should ever apply or reapply for a new license or certification, or
20 petition for reinstatement of a license, by any other health care licensing agency in the State of
21 California, all of the charges and allegations contained in Accusation, No. 800-2014-008700 shall
22 be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
23 Issues or any other proceeding seeking to deny or restrict licensure.

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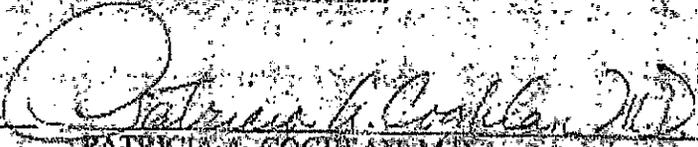
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ACCEPTANCE

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

DATED: 8/3/17


PATRICIA A. COGHLAN, MD
Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Medical Board of California of the Department of Consumer Affairs.

Dated:

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
JUDITH T. ALVARADO
Supervising Deputy Attorney General

BRIAN D. BILL
Deputy Attorney General
Attorneys for Complainant

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ACCEPTANCE

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

DATED: _____

PATRICIA A. COGHLAN, M.D.
Respondent

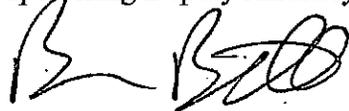
ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Medical Board of California of the Department of Consumer Affairs.

Dated: 8-4-17

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
JUDITH T. ALVARADO
Supervising Deputy Attorney General



BRIAN D. BILL
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 800-2014-008700

1 XAVIER BECERRA
Attorney General of California
2 JUDITH T. ALVARADO
Supervising Deputy Attorney General
3 BRIAN D. BILL
Deputy Attorney General
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California Department of Justice
5 300 So. Spring Street, Suite 1702
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Facsimile: (213) 897-9395
7 Attorneys for Complainant

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

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

11 In the Matter of the Accusation Against:
12 **Patricia A. Coghlan, M.D.**
13 **811 Tacuba Street**
14 **Los Angeles, CA**
15 **90065**
16 **Physician's and Surgeon's Certificate**
17 **No. A 22797,**
18 **Respondent.**

Case No. 800-2014-008700

A C C U S A T I O N

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, Department of Consumer
22 Affairs (Board).
23 2. On or about June 11, 1968, the Medical Board issued Physician's and Surgeon's
24 Certificate Number A 22797 to Patricia A. Coghlan, M.D. (Respondent). The Physician's and
25 Surgeon's Certificate expired on February 29, 2016, and has not been renewed.

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.

1 4. Section 118 of the Code states:

2 “(a) The withdrawal of an application for a license after it has been filed with a board in the
3 department shall not, unless the board has consented in writing to such withdrawal, deprive the
4 board of its authority to institute or continue a proceeding against the applicant for the denial of
5 the license upon any ground provided by law or to enter an order denying the license upon any
6 such ground.

7 “(b) The suspension, expiration, or forfeiture by operation of law of a license issued by a
8 board in the department, or its suspension, forfeiture, or cancellation by order of the board or by
9 order of a court of law, or its surrender without the written consent of the board, shall not, during
10 any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its
11 authority to institute or continue a disciplinary proceeding against the licensee upon any ground
12 provided by law or to enter an order suspending or revoking the license or otherwise taking
13 disciplinary action against the licensee on any such ground.

14 “(c) As used in this section, board includes an individual who is authorized by any
15 provision of this code to issue, suspend, or revoke a license, and license includes certificate,
16 registration, and permit.”

17 5. Section 2227 of the Code states:

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

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

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

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

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

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

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

9 6. Section 820 of the Code states:

10 “Whenever it appears that any person holding a license, certificate or permit under this
11 division or under any initiative act referred to in this division may be unable to practice his or her
12 profession safely because the licentiate's ability to practice is impaired due to mental illness, or
13 physical illness affecting competency, the licensing agency may order the licentiate to be
14 examined by one or more physicians and surgeons or psychologists designated by the agency.
15 The report of the examiners shall be made available to the licentiate and may be received as direct
16 evidence in proceedings conducted pursuant to Section 822.”

17 7. Section 822 of the Code states:

18 “If a licensing agency determines that its licentiate's ability to practice his or her
19 profession safely is impaired because the licentiate is mentally ill, or physically ill affecting
20 competency, the licensing agency may take action by any one of the following methods:

21 “(a) Revoking the licentiate's certificate or license.

22 “(b) Suspending the licentiate's right to practice.

23 “(c) Placing the licentiate on probation.

24 “(d) Taking such other action in relation to the licentiate as the licensing agency in its
25 discretion deems proper.

26 ““The licensing section shall not reinstate a revoked or suspended certificate or license until
27 it has received competent evidence of the absence or control of the condition which caused its
28 action and until it is satisfied that with due regard for the public health and safety the person's

1 right to practice his or her profession may be safely reinstated."

2 **CAUSE FOR DISCIPLINE**

3 **(Impairment Due to a Mental and/or Physical Condition)**

4 8. Respondent Patricia A. Coghlan, M.D. is subject to disciplinary action under sections
5 820 and 822 of the Code in that Respondent currently suffers from a mental and/or physical
6 ailment that inhibits her competency to safely practice medicine. The circumstances are as
7 follows:

8 9. On or about September 24, 2014, the Board received a complaint from a former
9 patient of Respondent's that alleged substandard care. On or about September 24, 2014, the
10 Board began investigating this complaint.

11 10. On or about February 4, 2015, the Board received a complaint from another former
12 patient of Respondent's that alleged an inability to contact Respondent. On or about February 4,
13 2015, the Board began investigating this complaint.

14 11. On or about June 9, 2015, the Board received a written statement from Respondent
15 wherein Respondent stated she was forced to close her medical office on or about September 2,
16 2014, due to a double concussion that affected her memory.

17 12. On or about May 18, 2016, Department of Consumer Affairs Investigator A.M.,
18 conducted an interview with Respondent. During that interview, Respondent executed voluntary
19 agreements for mental and physical examinations.

20 13. On or about June 30, 2016, Respondent met with Dr. D.S., M.D., to determine if
21 Respondent suffers from a mental condition that affects her ability to practice medicine. Dr. D.S.
22 interviewed the Respondent and conducted several psychological tests. During the meeting,
23 Respondent made the following statements:

24 A. She stopped working due to decreased memory resulting from two concussions.
25 Further, Respondent had not sought treatment for her concussions or memory loss as she "didn't
26 think anything could be done."

27 B. She closed her practice due to her memory loss. She put her medical files in
28 storage, but could not remember the location of the documents.

1 C. She writes prescriptions for employers, family, "and a few patients who won't
2 give [her] up." She wants to maintain a license for the purposes of writing prescriptions.

3 D. She currently suffers from atrial fibrillation;¹ however, she has not sought
4 treatment from a cardiologist in several years. Additionally, Respondent stated that she self-
5 prescribes medication to address this condition.

6 14. Based upon a review of documents related to the investigation of Respondent, the
7 interview of Respondent, and Respondent's performance on a battery of psychological testing,
8 Dr. D.S. developed a preliminary determination that Respondent was not safe to engage in the
9 solo practice of medicine. Dr. D.S. based his opinion on Respondent's decreased cognition,
10 specifically memory and organizational skills, and a decreased insight into her impairments. On
11 or about July 1, 2016, Dr. D.S. drafted a report that contained his findings and preliminary
12 opinion.

13 15. On or about August 30, 2016, the Board requested that Dr. G.F.H., Ph.D., meet with
14 and conduct neuropsychological testing of Respondent to determine if a cognitive condition exists
15 that could interfere with her ability to safely practice medicine.

16 16. Dr. G.F.H. met with Respondent twice and conducted a battery of neuropsychological
17 testing. Based upon the two meetings and the testing, Dr. G.F.H. noted that he has concerns with
18 the "way in which [Respondent] is processing information to make decisions of consequence.
19 The interviews revealed a pattern of lack of insight and poor judgment inconsistent with the skills
20 needed to practice medicine." Dr. G.F.H. concluded that Respondent likely has a diagnosis of
21 mild cognitive impairment (probable vascular type). Finally, Dr. G.F.H. opined that Respondent
22 has a disabling condition that impacts her ability to perform her professional services as a
23 physician and that Respondent is impaired in her ability to hold a medical license. On or about
24 December 16, 2016, Dr. G.F.H. drafted a report that contained his findings and opinion.

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27 _____
28 ¹ An irregular heartbeat that increases the risk of stroke and heart disease.

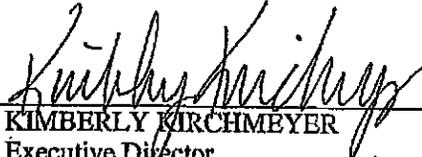
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PRAYER

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 or suspending Physician's and Surgeon's Certificate Number A 22797, issued to Patricia A. Coghlan, M.D.;
2. Revoking, suspending or denying approval of Patricia A. Coghlan, M.D.'s authority to supervise physician assistants and advanced practice nurses, pursuant to section 3527 of the Code;
3. Ordering Patricia A. Coghlan, M.D., if placed on probation, to pay the Board the costs of probation monitoring; and
4. Taking such other and further action as deemed necessary and proper.

DATED: May 9, 2017


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

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