

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

**In the Matter of the Second Amended
Accusation Against:**

Tara Alaina Zandvliet, M.D.

**Physician's and Surgeon's
Certificate No. A 71646**

Respondent.

Case No.: 800-2017-035630

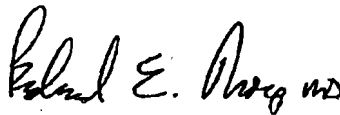
DECISION

The attached Stipulated Settlement 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 January 21, 2022.

IT IS SO ORDERED: December 23, 2021.

MEDICAL BOARD OF CALIFORNIA



**Richard E. Thorp, M.D., Chair
Panel B**

1 ROB BONTA
Attorney General of California
2 MATTHEW M. DAVIS
Supervising Deputy Attorney General
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9
10 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12
13 In the Matter of the Second Amended
14 Accusation Against:

15 **TARA ALAINA ZANDVLIET, M.D.**
2991 Kalmia St.
16 San Diego, CA 92104

17 **Physician's and Surgeon's Certificate No. A**
71646

18 Respondent.

Case No. 800-2017-00305630

OAH No. 2020120905

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

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. William Prasifka (Complainant) is the Executive Director of the Medical Board of
24 California (Board). He brought this action solely in his official capacity and is represented in this
25 matter by Rob Bonta, Attorney General of the State of California, by Tessa L. Heunis, Deputy
26 Attorney General.

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2. Respondent Tara Alaina Zandvliet, M.D. (Respondent) is represented in this proceeding by attorney Raymond J. McMahon, Esq., whose address is: 5440 Trabuco Road, Irvine, CA 92620.

3. On or about May 11, 2000, the Board issued Physician's and Surgeon's Certificate No. A 71646 to Tara Alaina Zandvliet, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Second Amended Accusation No. 800-2017-00305630, and will expire on July 31, 2023, unless renewed.

JURISDICTION

4. On August 13, 2020, Accusation No. 800-2017-00305630 was filed before the Board. A true and correct copy of the Accusation and all other statutorily required documents were properly served on Respondent, and Respondent timely filed her Notice of Defense contesting the Accusation. Subsequently, on November 30, 2020, First Amended Accusation 800-2017-00305630 was filed before the Board, and on September 9, 2021, Second Amended Accusation No. 800-2017-00305630 was filed before the Board and is currently pending against Respondent. The Second Amended Accusation and all other statutorily required documents were properly served on Respondent and all allegations therein were deemed controverted. A true and correct copy of Second Amended Accusation No. 800-2017-00305630 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and fully understands the charges and allegations in Second Amended Accusation No. 800-2017-00305630. Respondent has also carefully read, fully discussed with her counsel, and fully understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Second Amended Accusation; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision;

1 and all other rights accorded by the California Administrative Procedure Act and other applicable
2 laws.

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

5 **CULPABILITY**

6 8. Respondent admits the truth of each and every charge and allegation in Second
7 Amended Accusation No. 800-2017-00305630.

8 9. Respondent agrees that her Physician's and Surgeon's Certificate No. A 71646 is
9 subject to discipline and she agrees to be bound by the Board's imposition of discipline as set
10 forth in the Disciplinary Order below.

11 **CONTINGENCY**

12 10. This Stipulated Settlement and Disciplinary Order shall be subject to approval of the
13 Board. The parties agree that this Stipulated Settlement and Disciplinary Order shall be
14 submitted to the Board for its consideration in the above-entitled matter and, further, that the
15 Board shall have a reasonable period of time in which to consider and act on this Stipulated
16 Settlement and Disciplinary Order after receiving it. By signing this stipulation, Respondent fully
17 understands and agrees that she may not withdraw her agreement or seek to rescind this
18 stipulation prior to the time the Board considers and acts upon it.

19 11. The parties agree that this Stipulated Settlement and Disciplinary Order shall be null
20 and void and not binding upon the parties unless approved and adopted by the Board, except for
21 this paragraph, which shall remain in full force and effect. Respondent fully understands and
22 agrees that in deciding whether or not to approve and adopt this Stipulated Settlement and
23 Disciplinary Order, the Board may receive oral and written communications from its staff and/or
24 the Attorney General's Office. Communications pursuant to this paragraph shall not disqualify
25 the Board, any member thereof, and/or any other person from future participation in this or any
26 other matter affecting or involving Respondent. In the event that the Board does not, in its
27 discretion, approve and adopt this Stipulated Settlement and Disciplinary Order, with the
28 exception of this paragraph, it shall not become effective, shall be of no evidentiary value

1 whatsoever, and shall not be relied upon or introduced in any disciplinary action by either party
2 hereto. Respondent further agrees that should this Stipulated Settlement and Disciplinary Order
3 be rejected for any reason by the Board, Respondent will assert no claim that the Board, or any
4 member thereof, was prejudiced by its/his/her review, discussion and/or consideration of this
5 Stipulated Settlement and Disciplinary Order or of any matter or matters related hereto.

6 **ADDITIONAL PROVISIONS**

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

10 13. This Stipulated Settlement and Disciplinary Order is intended by the parties herein to
11 be an integrated writing representing the complete, final and exclusive embodiment of the
12 agreements of the parties in the above-entitled matter.

13 14. In consideration of the foregoing admissions and stipulations, the parties agree the
14 Board may, without further notice to or opportunity to be heard by Respondent, issue and enter
15 the following Disciplinary Order:

16 **DISCIPLINARY ORDER**

17 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 71646 issued
18 to Respondent Tara Alaina Zandvliet, M.D. is revoked. However, the revocation is stayed and
19 Respondent is placed on probation for five (5) years from the effective date of the Decision on the
20 terms and conditions set out below. This Order supersedes the probationary order in Case No.
21 800-2017-032412.

22 1. **CONTROLLED SUBSTANCES - PARTIAL RESTRICTION.** Respondent shall not
23 order, prescribe, dispense, administer, furnish, or possess any controlled substances as defined by
24 the California Uniform Controlled Substances Act, except for those drugs listed in Schedules III,
25 IV and V of the Act.

26 Respondent shall not issue an oral or written recommendation or approval to a patient or a
27 patient's primary caregiver for the possession or cultivation of marijuana for the personal medical
28 purposes of the patient within the meaning of Health and Safety Code section 11362.5. If

1 Respondent forms the medical opinion, after an appropriate prior examination and medical
2 indication, that a patient's medical condition may benefit from the use of marijuana, Respondent
3 shall so inform the patient and shall refer the patient to another physician who, following an
4 appropriate prior examination and medical indication, may independently issue a medically
5 appropriate recommendation or approval for the possession or cultivation of marijuana for the
6 personal medical purposes of the patient within the meaning of Health and Safety Code section
7 11362.5. In addition, Respondent shall inform the patient or the patient's primary caregiver that
8 Respondent is prohibited from issuing a recommendation or approval for the possession or
9 cultivation of marijuana for the personal medical purposes of the patient and that the patient or
10 the patient's primary caregiver may not rely on Respondent's statements to legally possess or
11 cultivate marijuana for the personal medical purposes of the patient. Respondent shall fully
12 document in the patient's chart that the patient or the patient's primary caregiver was so
13 informed. Nothing in this condition prohibits Respondent from providing the patient or the
14 patient's primary caregiver information about the possible medical benefits resulting from the use
15 of marijuana.

16 Respondent shall immediately surrender Respondent's current DEA permit to the Drug
17 Enforcement Administration for cancellation and reapply for a new DEA permit limited to those
18 Schedules authorized by this order. Within 15 calendar days after the effective date of this
19 Decision, Respondent shall submit proof that Respondent has surrendered Respondent's DEA
20 permit to the Drug Enforcement Administration for cancellation and re-issuance. Within 15
21 calendar days after the effective date of issuance of a new DEA permit, Respondent shall submit a
22 true copy of the permit to the Board or its designee.

23 2. CONTROLLED SUBSTANCES - MAINTAIN RECORDS AND ACCESS TO
24 RECORDS AND INVENTORIES. Respondent shall maintain a record of all controlled
25 substances ordered, prescribed, dispensed, administered, or possessed by Respondent, and any
26 recommendation or approval which enables a patient or patient's primary caregiver to possess or
27 cultivate marijuana for the personal medical purposes of the patient within the meaning of Health
28 and Safety Code section 11362.5, during probation, showing all of the following: 1) the name and

1 address of the patient; 2) the date; 3) the character and quantity of controlled substances involved;
2 and 4) the indications and diagnosis for which the controlled substances were furnished.

3 Respondent shall keep these records in a separate file or ledger, in chronological order. All
4 records and any inventories of controlled substances shall be available for immediate inspection
5 and copying on the premises by the Board or its designee at all times during business hours and
6 shall be retained for the entire term of probation.

7 3. PREScribing PRACTICES COURSE. Within 60 calendar days of the effective
8 date of this Decision, Respondent shall enroll in a course in prescribing practices approved in
9 advance by the Board or its designee. Respondent shall provide the approved course provider
10 with any information and documents that the approved course provider may deem pertinent.
11 Respondent shall participate in and successfully complete the classroom component of the course
12 not later than six (6) months after Respondent's initial enrollment. Respondent shall successfully
13 complete any other component of the course within one (1) year of enrollment. The prescribing
14 practices course shall be at Respondent's expense and shall be in addition to the Continuing
15 Medical Education (CME) requirements for renewal of licensure.

16 A prescribing practices course taken after the acts that gave rise to the charges in the
17 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board
18 or its designee, be accepted towards the fulfillment of this condition if the course would have
19 been approved by the Board or its designee had the course been taken after the effective date of
20 this Decision.

21 Respondent shall submit a certification of successful completion to the Board or its
22 designee not later than 15 calendar days after successfully completing the course, or not later than
23 15 calendar days after the effective date of the Decision, whichever is later.

24 4. CLINICAL COMPETENCE ASSESSMENT PROGRAM. Within 60 calendar days
25 of the effective date of this Decision, Respondent shall enroll in a clinical competence assessment
26 program approved in advance by the Board or its designee. Respondent shall successfully
27 complete the program not later than six (6) months after Respondent's initial enrollment unless
28 the Board or its designee agrees in writing to an extension of that time.

1 The program shall consist of a comprehensive assessment of Respondent's physical and
2 mental health and the six general domains of clinical competence as defined by the Accreditation
3 Council on Graduate Medical Education and American Board of Medical Specialties pertaining to
4 Respondent's current or intended area of practice. The program shall take into account data
5 obtained from the pre-assessment, self-report forms and interview, and the Decision(s),
6 Accusation(s), and any other information that the Board or its designee deems relevant. The
7 program shall require Respondent's on-site participation for a minimum of three (3) and no more
8 than five (5) days as determined by the program for the assessment and clinical education
9 evaluation. Respondent shall pay all expenses associated with the clinical competence
10 assessment program.

11 At the end of the evaluation, the program will submit a report to the Board or its designee
12 which unequivocally states whether the Respondent has demonstrated the ability to practice
13 safely and independently. Based on Respondent's performance on the clinical competence
14 assessment, the program will advise the Board or its designee of its recommendation(s) for the
15 scope and length of any additional educational or clinical training, evaluation or treatment for any
16 medical condition or psychological condition, or anything else affecting Respondent's practice of
17 medicine. Respondent shall comply with the program's recommendations.

18 Determination as to whether Respondent successfully completed the clinical competence
19 assessment program is solely within the program's jurisdiction.

20 If Respondent fails to enroll, participate in, or successfully complete the clinical
21 competence assessment program within the designated time period, Respondent shall receive a
22 notification from the Board or its designee to cease the practice of medicine within three (3)
23 calendar days after being so notified. The Respondent shall not resume the practice of medicine
24 until enrollment or participation in the outstanding portions of the clinical competence assessment
25 program have been completed. If the Respondent did not successfully complete the clinical
26 competence assessment program, the Respondent shall not resume the practice of medicine until a
27 final decision has been rendered on the accusation and/or a petition to revoke probation. The
28 cessation of practice shall not apply to the reduction of the probationary time period.

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

10 The Board or its designee shall provide the approved monitor with copies of the Decision(s)
11 and Accusation(s), and a proposed monitoring plan. Within 15 calendar days of receipt of the
12 Decision(s), Accusation(s), and proposed monitoring plan, the monitor shall submit a signed
13 statement that the monitor has read the Decision(s) and Accusation(s), fully understands the role
14 of a monitor, and agrees or disagrees with the proposed monitoring plan. If the monitor disagrees
15 with the proposed monitoring plan, the monitor shall submit a revised monitoring plan with the
16 signed statement for approval by the Board or its designee.

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

21 If Respondent fails to obtain approval of a monitor within 60 calendar days of the effective
22 date of this Decision, Respondent shall receive a notification from the Board or its designee to
23 cease the practice of medicine within three (3) calendar days after being so notified. Respondent
24 shall cease the practice of medicine until a monitor is approved to provide monitoring
25 responsibility.

26 The monitor(s) shall submit a quarterly written report to the Board or its designee which
27 includes an evaluation of Respondent's performance, indicating whether Respondent's practices
28 are within the standards of practice of medicine, and whether Respondent is practicing medicine

1 safely, billing appropriately or both. It shall be the sole responsibility of Respondent to ensure
2 that the monitor submits the quarterly written reports to the Board or its designee within 10
3 calendar days after the end of the preceding quarter.

4 If the monitor resigns or is no longer available, Respondent shall, within 5 calendar days of
5 such resignation or unavailability, submit to the Board or its designee, for prior approval, the
6 name and qualifications of a replacement monitor who will be assuming that responsibility within
7 15 calendar days. If Respondent fails to obtain approval of a replacement monitor within 60
8 calendar days of the resignation or unavailability of the monitor, Respondent shall receive a
9 notification from the Board or its designee to cease the practice of medicine within three (3)
10 calendar days after being so notified. Respondent shall cease the practice of medicine until a
11 replacement monitor is approved and assumes monitoring responsibility.

12 In lieu of a monitor, Respondent may participate in a professional enhancement program
13 approved in advance by the Board or its designee that includes, at minimum, quarterly chart
14 review, semi-annual practice assessment, and semi-annual review of professional growth and
15 education. Respondent shall participate in the professional enhancement program at Respondent's
16 expense during the term of probation.

17 6. PROHIBITED PRACTICE. During probation, Respondent is prohibited from
18 making or issuing any written exemption from immunization, or any other written statements
19 providing that any child is exempt from the requirements of Chapter 1 (commencing with Section
20 120325, but excluding Section 120380) and Sections 120400, 120405, 120410, and 120415 of the
21 Health and Safety Code. After the effective date of this Decision, all patients being treated by
22 Respondent shall be notified of this prohibition. Any new patients must be provided this
23 notification at the time of their initial appointment.

24 Respondent shall maintain a log of all patients to whom the required oral notification was
25 made. The log shall contain the: 1) patient's name, address and phone number; 2) patient's
26 medical record number, if available; 3) the full name of the person making the notification; 4) the
27 date the notification was made; and 5) a description of the notification given. Respondent shall
28 keep this log in a separate file or ledger, in chronological order, shall make the log available for

1 immediate inspection and copying on the premises at all times during business hours by the Board
2 or its designee, and shall retain the log for the entire term of probation.

3 As used in this section, "patient(s)" refers to minor patients and their parents, custodians
4 and other legal guardians.

5 7. NOTIFICATION. Within seven (7) days of the effective date of this Decision, the
6 Respondent shall provide a true copy of this Decision and Accusation to the Chief of Staff or the
7 Chief Executive Officer at every hospital where privileges or membership are extended to
8 Respondent, at any other facility where Respondent engages in the practice of medicine,
9 including all physician and *locum tenens* registries or other similar agencies, and to the Chief
10 Executive Officer at every insurance carrier which extends malpractice insurance coverage to
11 Respondent. Respondent shall submit proof of compliance to the Board or its designee within 15
12 calendar days.

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

14 8. SUPERVISION OF PHYSICIAN ASSISTANTS AND ADVANCED PRACTICE
15 NURSES. During probation, Respondent is prohibited from supervising physician assistants and
16 advanced practice nurses.

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

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

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

25 11. GENERAL PROBATION REQUIREMENTS.

26 Compliance with Probation Unit

27 Respondent shall comply with the Board's probation unit.

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1 Address Changes

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

7 Place of Practice

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

11 License Renewal

12 Respondent shall maintain a current and renewed California physician's and surgeon's
13 license.

14 Travel or Residence Outside California

15 Respondent shall immediately inform the Board or its designee, in writing, of travel to any
16 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than thirty
17 (30) calendar days.

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

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

24 13. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or
25 its designee in writing within 15 calendar days of any periods of non-practice lasting more than
26 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is
27 defined as any period of time Respondent is not practicing medicine as defined in Business and
28 Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month in direct

1 patient care, clinical activity or teaching, or other activity as approved by the Board. If
2 Respondent resides in California and is considered to be in non-practice, Respondent shall
3 comply with all terms and conditions of probation. All time spent in an intensive training
4 program which has been approved by the Board or its designee shall not be considered non-
5 practice and does not relieve Respondent from complying with all the terms and conditions of
6 probation. Practicing medicine in another state of the United States or Federal jurisdiction while
7 on probation with the medical licensing authority of that state or jurisdiction shall not be
8 considered non-practice. A Board-ordered suspension of practice shall not be considered as a
9 period of non-practice.

10 In the event Respondent's period of non-practice while on probation exceeds 18 calendar
11 months, Respondent shall successfully complete the Federation of State Medical Boards' Special
12 Purpose Examination, or, at the Board's discretion, a clinical competence assessment program
13 that meets the criteria of Condition 18 of the current version of the Board's "Manual of Model
14 Disciplinary Orders and Disciplinary Guidelines" prior to resuming the practice of medicine.

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

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

17 Periods of non-practice for a Respondent residing outside of California will relieve
18 Respondent of the responsibility to comply with the probationary terms and conditions with the
19 exception of this condition and the following terms and conditions of probation: Obey All Laws;
20 General Probation Requirements; Quarterly Declarations; Abstain from the Use of Alcohol and/or
21 Controlled Substances; and Biological Fluid Testing..

22 14. COMPLETION OF PROBATION. Respondent shall comply with all financial
23 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
24 completion of probation. Upon successful completion of probation, Respondent's certificate shall
25 be fully restored.

26 15. VIOLATION OF PROBATION. Failure to fully comply with any term or condition
27 of probation is a violation of probation. If Respondent violates probation in any respect, the
28 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and

1 carry out the disciplinary order that was stayed. If an Accusation, or Petition to Revoke Probation,
2 or an Interim Suspension Order is filed against Respondent during probation, the Board shall have
3 continuing jurisdiction until the matter is final, and the period of probation shall be extended until
4 the matter is final.

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

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

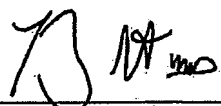
20 18. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for
21 a new license or certification, or petition for reinstatement of a license, by any other health care
22 licensing action agency in the State of California, all of the charges and allegations contained in
23 Second Amended Accusation No. 800-2017-00305630 shall be deemed to be true, correct, and
24 admitted by Respondent for the purpose of any Statement of Issues or any other proceeding
25 seeking to deny or restrict license.

26 ACCEPTANCE

27 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
28 discussed it with my attorney, Raymond J. McMahon, Esq. I fully understand the stipulation and

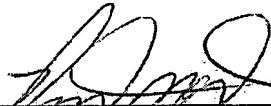
1 the effect it will have on my Physician's and Surgeon's Certificate No. A 71646. I enter into this
2 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
3 to be bound by the Decision and Order of the Medical Board of California.

4
5 DATED: 9/17/21


TARA ALAINA ZANDVLIET, M.D.
Respondent

7 I have read and fully discussed with Respondent Tara Alaina Zandvliet, M.D. the terms and
8 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
9 I approve its form and content.

10 DATED: Sept 17, 2021


RAYMOND J. MCMAHON, ESQ.
Attorney for Respondent

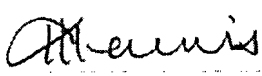
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13 **ENDORSEMENT**

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

16 DATED: September 20, 2021

17 Respectfully submitted,

18 ROB BONTA
Attorney General of California
19 MATTHEW M. DAVIS
Supervising Deputy Attorney General

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21 TESSA L. HEUNIS
22 Deputy Attorney General
23 Attorneys for Complainant
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