

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

In the Matter of the Accusation Against:

GORDON JOHNSON CROZIER, D.O.

**1301 S. International Parkway, Suite 1041
Lake Mary, FL 32746-1409**

**Osteopathic Physician's and Surgeon's
Certificate No. 20 A 15931**

Respondent.

Case No. 900-2021-000624


OAH No. 2022120712

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Osteopathic Medical Board of California, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on March 16, 2023.

It is so ORDERED March 9, 2023.



FOR THE OSTEOPATHIC MEDICAL BOARD OF
CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS

1 ROB BONTA
Attorney General of California
2 MARY CAIN-SIMON
Supervising Deputy Attorney General
3 CAROLYNE EVANS
Deputy Attorney General
4 State Bar No. 289206
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 510-3448
6 Facsimile: (415) 703-5480
Attorneys for Complainant
7

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

11 In the Matter of the Accusation Against:	Case No. 900-2021-000624
12 GORDON JOHNSON CROZIER, D.O.	OAH No. 2022120712
13 1301 S. International Parkway, Suite 1041	STIPULATED SURRENDER OF
14 Lake Mary, FL 32746-1409	LICENSE AND ORDER
15 Osteopathic Physician's and Surgeon's	
16 Certificate No. 20 A 15931	
17 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. Erika Calderon (Complainant) is the Executive Director of the Osteopathic Medical
22 Board of California (Board). She brought this action solely in her official capacity and is
23 represented in this matter by Rob Bonta, Attorney General of the State of California, by Carolyne
24 Evans, Deputy Attorney General.

25 2. Gordon Johnson Crozier, D.O. (Respondent) is represented in this proceeding by
26 attorney Lucy McAllister, whose address is: 255 North Market Street, Suite 100, San Jose,
27 California 95110.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: 3/6/2023

DocuSigned by:
Gordon Crozier
740DE661ED39421...

GORDON JOHNSON CROZIER, D.O.
Respondent

I have read and fully discussed with Respondent Gordon Johnson Crozier, D.O. the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: 3/6/2023

DocuSigned by:
LUCY McALLISTER
2BC1A09798A34B0...

LUCY McALLISTER
Attorney for Respondent

ENDORSEMENT

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

DATED: 3/6/2023

Respectfully submitted,
ROB BONTA
Attorney General of California
MARY CAIN-SIMON
Supervising Deputy Attorney General

Carolynne Evans

CAROLYNE EVANS
Deputy Attorney General
Attorneys for Complainant

Exhibit A

Accusation No. 900-2021-000624

1 ROB BONTA
Attorney General of California
2 MARY CAIN-SIMON
Supervising Deputy Attorney General
3 CAROLYNE EVANS
Deputy Attorney General
4 State Bar No. 289206
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 510-3448
6 Facsimile: (415) 703-5480
Attorneys for Complainant
7

FILED

NOV 04 2022

OSTEOPATHIC MEDICAL BOARD
OF CALIFORNIA

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

12 In the Matter of the Accusation Against:

Case No. 900-2021-000624

13 **Gordon Johnson Crozier, D.O.**
14 **1301 S. International Parkway, Suite 1041**
15 **Lake Mary, FL 32746-1409**

ACCUSATION

16 **Osteopathic Physician's and Surgeon's**
17 **Certificate**
18 **No. 20A 15931,**

Respondent.

19
20
21 **PARTIES**

22 1. Erika Calderon (Complainant) brings this Accusation solely in his official capacity as
23 the Executive Director of the Osteopathic Medical Board of California, Department of Consumer
24 Affairs (Board).

25 2. On October 13, 2017, the Board issued Osteopathic Physician's and Surgeon's
26 Certificate Number 20A 15931 to Gordon Johnson Crozier, D.O. (Respondent). The Osteopathic
27 Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the
28 charges brought herein and will expire on July 31, 2023, unless renewed.

1 **JURISDICTION**

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

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

9 5. Section 2234 of the Code provides that the Board shall take action against any
10 licensee who is charged with "unprofessional conduct," which includes but is not limited to,
11 "[v]iolating . . . any provision of this chapter."

12 6. Section 2305 of the Code provides, in pertinent part, that the revocation, suspension,
13 or other discipline, restriction, or limitation imposed by another state upon a license to practice
14 medicine issued by that state, or the revocation, suspension, or restriction of the authority to
15 practice medicine by any agency of the federal government, that would have been grounds for
16 discipline in California, shall constitute grounds for disciplinary action for unprofessional
17 conduct.

18 7. Section 141 of the Code provides:

19 (a) For any licensee holding a license issued by a board under the jurisdiction of the
20 department, a disciplinary action taken by another state, by any agency of the federal government,
21 or by another country for any act substantially related to the practice regulated by the California
22 license, may be a ground for disciplinary action by the respective state licensing board. A
23 certified copy of the record of the disciplinary action taken against the licensee by another state,
24 an agency of the federal government, or another country shall be conclusive evidence of the
25 events related therein.

26 (b) Nothing in this section shall preclude a board from applying a specific statutory
27 provision in the licensing act administered by that board that provides for discipline based upon a
28

1 disciplinary action taken against the licensee by another state, an agency of the federal
2 government or another country.

3 **COST RECOVERY**

4 8. Effective January 1, 2022, Section 125.3 of the Code provides, in pertinent part, that
5 the Board may request the administrative law judge to direct a licensee found to have committed
6 a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the
7 investigation and enforcement of the case, with failure of the licensee to comply subjecting the
8 license to not being renewed or reinstated. If a case settles, recovery of investigation and
9 enforcement costs may be included in a stipulated settlement.

10 **(Discipline, Restriction, or Limitation Imposed by Another State)**

11 9. On January 15, 2020, the State of Florida Department of Health (Department of
12 Health) filed an "Administrative Complaint" against Respondent's Florida medical license
13 (Florida Complaint). The Florida Complaint alleges that:

14 On March 13, 2016¹, Patient S.L. presented to Respondent's office with complaints of
15 headaches, cognitive decline, fatigue, and hair loss. Respondent diagnosed Patient S.L. with
16 mold toxicity and elevated C4a² levels. Respondent treated Patient S.L. with intravenous
17 treatments of phenylbutyrate,³ leucovorin,⁴ amino acids essential infusion,⁵ hydrogen peroxide,⁶
18 vitamin C infusion, and silver infusion. Respondent also prescribed the following supplements
19

20 ¹ All dates are to be considered approximate for the purpose of this Accusation.

21 ² C4a levels are measured by the amount of protein in the blood. Monitoring C4a levels
22 can help a practitioner diagnose and monitor certain chronic conditions, such as lupus.

23 ³Phenylbutyrate is a drug approved for the treatment of hyperammonemia in patients with
urea cycle disorders, a series of at least eight rare genetic enzyme deficiencies.

24 ⁴ Leucovorin is a prescription medication used to decrease the toxic effects of a cancer
25 medication called methotrexate. It can treat anemia caused by a lack of folic acid. It can also be
given to colon cancer patients and to treat overdoses of certain medicines.

26 ⁵ Amino acids are used by the body as a source of protein and nitrogen. Amino acid
27 injections are used to treat patients who are unable to eat properly due to illness or surgery.

28 ⁶ Hydrogen peroxide is used as an oxidizer, bleaching agent, and antiseptic.

1 for Patient S.L.; digestive enzymes⁷, magnesium citrate⁸, adrenal complex,⁹ omega-3 fatty acids,¹⁰
2 toxin binder,¹¹ and Neuromag¹². (Florida Complaint attached as Exhibit A).

3 The Department of Health alleged that Respondent committed “medical malpractice,”
4 meaning the failure to practice medicine in accordance with the level of care, skill, and treatment
5 recognized in general law related to health care licensure. Section 766.102 of the Florida
6 Statutes, provides that the prevailing standard of care shall be “that level of care, skill, and
7 treatment, which, in light of all relevant surrounding circumstances, is recognized as acceptable
8 and appropriate by reasonably prudent similar healthcare providers.”

9 The Florida Complaint alleges that Respondent “fell below the minimum standard of care
10 in his treatment of Patient S.L. in the following ways:

- 11 a. By offering unproved, deceptive, and misleading tests and treatments to Patient S.L.;
- 12 b. By failing to refer Patient S.L. to ancillary medical providers to aid with her medical
13 complaints;
- 14 c. By prescribing inappropriate medications that have no proven efficacy and no
15 scientific evidence to support use; and/or
- 16 d. By prescribing infusions with substances that put Patient S.L. at risk for serious
17 health complications.”

18 The Department of Health also alleged that Respondent violated Florida Statute
19 459.015(1)(q) in that Respondent “exercised influence on Patient S.L. for financial gain in one or
20 more of the following ways:

21 ⁷ Digestive Enzymes are a group of enzymes that break down polymeric macromolecules
22 into their smaller building blocks, in order to facilitate their absorption by the body.

23 ⁸ Magnesium citrate is a magnesium preparation in salt form with citric acid.

24 ⁹ Adrenal complex is a glandular-based product designed to support overall adrenal
function.

25 ¹⁰ Omega-3 fatty acids are polyunsaturated fatty acids.

26 ¹¹ Toxin binders are made up of selected silicates or yeast cells. They are used to reduce
27 mycotoxicosis.

28 ¹² Neuromag is Magnesium L-Threonate. Neuromag supports healthy memory and
cognition.

- 1 a. By offering unproven, deceptive, and misleading tests, and treatments;
- 2 b. By offering inappropriate medications that have no proven efficacy and no scientific
- 3 evidence to support use; and/or
- 4 c. By prescribing infusions with substances that put Patient S.L. at risk for serious health
- 5 complications.

6 10. On February 18, 2021, the Florida Department of Health and Respondent entered into
7 a stipulated settlement agreement that resolved the Florida Complaint. (Settlement Agreement
8 attached as Exhibit B). Under the Settlement Agreement, Respondent agreed to complete five
9 hours of continuing medical education in ethics and "risk management." Respondent also agreed
10 to pay to the Florida Board of Osteopathic Medicine (Florida Board) an administrative fine of
11 \$15,000.00.

12 11. On May 25, 2021, the Florida Board issued a "Final Order Accepting Settlement
13 Agreement." (Florida Order) Case No. 2017-07957. The Florida Order restricts and/or
14 disciplines Respondent's Florida medical license. (Florida Order attached as Exhibit C). The
15 Florida Order states that the Florida Board accepted the Settlement Agreement that was entered
16 into by the Department of Health and Respondent. The Florida Order also states that the:
17 "Settlement Agreement is amended to state that for the continuing medical education required in
18 paragraphs 4 and 5 of the Settlement Agreement, the Ethics Course shall include the topic of
19 exercising influence over the patient for financial gain and the Risk Management Course shall
20 include the topic of the approved use of non-FDA-approved medication or therapies in patient
21 care, and the courses shall be pre-approved by the Board chair." The Florida Order assessed
22 investigative and prosecution costs in the amount of \$4,791.01 against Respondent.

23 12. Respondent's foregoing conduct and the actions of the Florida Board, as set forth in
24 paragraphs 9 and 11, above, and Exhibit A, Exhibit B, and Exhibit C constitute cause for
25 discipline, pursuant to section 2234 and/or section 2305 and/or 141 of the Code.

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PRAYER

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

1. Revoking or suspending Osteopathic Physician's and Surgeon's Certificate Number 20A 15931, issued to Gordon Johnson Crozier, D.O.;
2. Revoking, suspending or denying approval of Gordon Johnson Crozier, D.O.'s authority to supervise physician assistants and advanced practice nurses;
3. Ordering Gordon Johnson Crozier, D.O., to pay the Board the costs of the investigation and enforcement of this case, and if placed on probation, the costs of probation monitoring; and
4. Taking such other and further action as deemed necessary and proper.

DATED: 11/04/2022

Erika Calderon

ERIKA CALDERON
Executive Director
Osteopathic Medical Board of California
Department of Consumer Affairs
State of California
Complainant

SF2022401846
43453253.docx

DECLARATION OF SERVICE BY CERTIFIED MAIL AND FIRST CLASS MAIL
(Separate Mailings)

**In the Matter of the Accusation Against:
Gordon Johnson Crozier, D.O.
Case No: 900-2021-000624**

I, the undersigned, declare that I am over 18 years of age and not a party to the within cause; my business address is 1300 National Drive, Suite 150, Sacramento, CA 95834.

On **November 4, 2022**, I served the attached **Accusation, Statement to Respondent, Request for Discovery, Notice of Defense (two copies), and Government Code Sections 11507.5, 11507.6 and 11507.7**, by placing a true copy thereof enclosed in a sealed envelope as certified mail with postage thereon fully prepaid and return receipt requested, and another true copy of the **Accusation, Statement to Respondent, Request for Discovery, Notice of Defense (two copies), and Government Code Sections 11507.5, 11507.6 and 11507.7** as enclosed in a second sealed envelope as first class mail with postage thereon fully prepaid, in the internal mail collection system at the Office of the Osteopathic Medical Board of California addressed as follows:

NAME AND ADDRESS

(certified and regular mail)

Gordon Johnson Crozier, D.O.
1301 S. International Parkway, Suite 1041
Lake Mary, FL 32746-1409

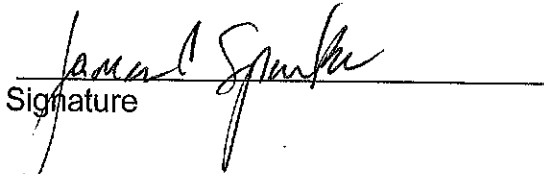
Certified Mail No

9489 0090 0027 6244 3704 00

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on November 4, 2022, at Sacramento, California.

James C. Sparks
Declarant

Signature



cc: Carolyne Evans, Deputy Attorney General

DECLARATION OF SERVICE BY CERTIFIED AND FIRST-CLASS MAIL

IN THE MATTER OF THE ACCUSATION AGAINST:

GORDON JOHNSON CROZIER, D.O.

Case No. 900 2021 000624

I, the undersigned, declare that I am over 18 years of age and not a party to the within cause; my business address is 1300 National Drive, Suite 150, Sacramento, California 95834. I served a true copy of the attached:

DECISION AND ORDER

by mail on each of the following, by placing same in an envelope (or envelopes) addressed (respectively) as follows:

NAME AND ADDRESS

CERTIFIED MAIL TRACKING NO.

Gordon Johnson Crozier, D.O.
1301 Lake S. International Parkway, Suite 1041
Lake Mary, Florida 32746-1409

**7012 2920 0000 1156 6345 and
First Class Mail**

Lucy McAllister, Esq.
255 North Market Street, Suite 100
San Jose, California 95110

7012 2920 0000 1156 6352

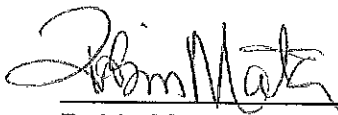
Carolynne Evans
Deputy Attorney General
California Department of Justice
455 Golden Gate Avenue, Suite 11000
San Francisco, California 94102-7004

First Class Mail

Each said envelope was then, on March 9, 2023, sealed and deposited in the United States mail at Sacramento, California, the county in which I am employed, either as certified mail or first-class U.S. mail with the postage thereon fully prepaid and return receipt requested for the certified mail.

Executed on March 9, 2023, at Sacramento, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



Robin Matson, Declarant