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.

OAH No. 2022120712

Case No. 900-2021-000624

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 OSTEOPÄTHIC MEDICAL BOARD OF CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS

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1	ROB BONTA Attorney General of California				
2	MARY ČAIN-SIMON Supervising Deputy Attorney General				
3	CAROLYNE EVANS				
4	Deputy Attorney General State Bar No. 289206				
5	455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102-7004				
6	Telephone: (415) 510-3448 Facsimile: (415) 703-5480				
7	Attorneys for Complainant				
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	BEFORE THE OSTEOPATHIC MEDICAL BOARD OF CALIFORNIA				
9	DEPARTMENT OF CONSUMER AFFAIRS				
10	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					
14	1301 S. International Parkway, Suite 1041 Lake Mary, FL 32746-1409	STIPULATED SURRENDER OF LICENSE AND ORDER			
15	Osteopathic Physician's and Surgeon's Certificate No. 20 A 15931				
16	Respondent.				
17					
18	IT IS HEREBY STIPULATED AND AGR	EED by and between the parties to the above-			
19	entitled proceedings that the following matters are				
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21	PARTIES				
22	1. Erika Calderon (Complainant) is the Executive Director of the Osteopathic Medical				
23	Board of California (Board). She brought this action solely in her official capacity and is				
	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.				
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1	3. On October 13, 2017, the Board issued Osteopathic Physician's and Surgeon's	
2	Certificate No. 20 A 15931 to Respondent. The Osteopathic Physician's and Surgeon's Certificate	
3	was in full force and effect at all times relevant to the charges brought in Accusation No. 900-	
4	2021-000624 and will expire on July 31, 2023, unless renewed.	
5	JURISDICTION	
6	4. Accusation No. 900-2021-000624 was filed before the Board, and is currently	
7	pending against Respondent. The Accusation and all other statutorily required documents were	
8	properly served on Respondent on November 4, 2022. Respondent timely filed his Notice of	
9	Defense contesting the Accusation. A copy of Accusation No. 900-2021-000624 is attached as	
10	Exhibit A and incorporated by reference.	
11	ADVISEMENT AND WAIVERS	
12	5. Respondent has carefully read, fully discussed with counsel, and understands the	
13	charges and allegations in Accusation No. 900-2021-000624. Respondent also has carefully read,	
14	fully discussed with counsel, and understands the effects of this Stipulated Surrender of License	
15	and Order.	
16	6. Respondent is fully aware of his legal rights in this matter, including the right to a	
17	hearing on the charges and allegations in the Accusation; the right to confront and cross-examine	
18	the witnesses against him; the right to present evidence and to testify on his own behalf; the right	
19	to the issuance of subpoenas to compel the attendance of witnesses and the production of	
20	documents; the right to reconsideration and court review of an adverse decision; and all other	
21	rights accorded by the California Administrative Procedure Act and other applicable laws.	
22	7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and	
23	every right set forth above.	
24	<u>CULPABILITY</u>	
25	8. Respondent understands that the charges and allegations in Accusation No. 900-2021-	
26	000624, if proven at a hearing, constitute cause for imposing discipline upon his Osteopathic	
27	Physician's and Surgeon's Certificate.	
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Stipulated Surrender of License (Case No. 900-2021-000624)

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

6 10. Respondent understands that by signing this stipulation he enables the Board to issue
7 an order accepting the surrender of his Osteopathic Physician's and Surgeon's Certificate without
8 further process.

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CONTINGENCY

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

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

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

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ORDER

IT IS HEREBY ORDERED that Osteopathic Physician's and Surgeon's Certificate No. 20
A 15931, issued to Respondent Gordon Johnson Crozier, D.O., is surrendered and accepted by the
Board.

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

2. Respondent shall lose all rights and privileges to practice as an osteopathic physician
and surgeon in California as of the effective date of the Board's Decision and Order.

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

9 4. If Respondent ever files an application for licensure or a petition for reinstatement in
10 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
11 comply with all the laws, regulations and procedures for reinstatement of a revoked or
12 surrendered license in effect at the time the petition is filed, and all of the charges and allegations
13 contained in Accusation No. 900-2021-000624 shall be deemed to be true, correct and admitted
14 by Respondent when the Board determines whether to grant or deny the petition.

15 5. Respondent shall pay the agency its costs of investigation and enforcement in the
16 amount of \$7,386.25 prior to issuance of a new or reinstated license.

6. If Respondent should ever apply or reapply for a new license or certification, or
petition for reinstatement of a license, by any other health care licensing agency in the State of
California, all of the charges and allegations contained in Accusation, No. 900-2021-000624 shall
be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
Issues or any other proceeding seeking to deny or restrict licensure.

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ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney Lucy McAllister. I understand the stipulation and the effect it will have on my Osteopathic 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 Osteopathic Medical Board of California.

1	DATED:	3/6/2023	Cordon (rogier 7400E661ED39421
2			GORDON JOHNSON CROZIER, D.O. Respondent
3	I have	read and fully discus	sed with Respondent Gordon Johnson Crozier, D.O. the terms
4	and conditio	ns and other matters	contained in this Stipulated Surrender of License and Order. I
5	approve its f	form and content.	DoouSigned by:
6	DATED:	3/6/2023	WCY MCAUSTER
7			LUCY McALLISTER Attorney for Respondent
8			
9	<u>ENDORSEMENT</u>		
10	The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted		
11	for consideration by the Osteopathic Medical Board of California of the Department of Consumer		
12	Affairs.		
13	DATED: 3	0/6/2023	Respectfully submitted,
14 15			ROB BONTA Attorney General of California MARY CAIN-SIMON
16			Supervising Deputy Attorney General
17			
18			Carolyne Evans
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21			CAROLYNE EVANS Deputy Attorney General
22			Attorneys for Complainant
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Exhibit A

Accusation No. 900-2021-000624

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1 2 3 4 5 6	ROB BONTA Attorney General of California MARY CAIN-SIMON Supervising Deputy Attorney General CAROLYNE EVANS Deputy Attorney General State Bar No. 289206 455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102-7004 Telephone: (415) 510-3448 Facsimile: (415) 703-5480 Attorneys for Complainant	FILED MOV 04 2022 OPATHIC MEDICAL BOARD OF CALIFORNIA	
7			
8	BEFORE THE OSTEOPATHIC MEDICAL BOARD OF CALIFORNIA		
9 10	DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA		
10	STATE OF CAL		
12			
12	In the Matter of the Accusation Against:	ase No. 900-2021-000624	
14	Gordon Johnson Crozier, D.O. 1301 S. International Parkway, Suite 1041 Lake Mary, FL 32746-1409	CCUSATION	
15 16	Osteopathic Physician's and Surgeon's Certificate		
17	No. 20A 15931,		
18	Respondent.	·	
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21	PARTI	2 <u>S</u>	
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	e and effect at all times relevant to the	
28	charges brought herein and will expire on July 31, 2	023, unless renewed.	
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	(GORDON JOHNSON CRO	ZIER, D.O.) ACCUSATION NO. 900-2021-000624	

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JURISDICTION

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

4. Section 2227 of the Code provides that a licensee who is found guilty under the Medical Practice Act may have his license revoked, suspended for a period not to exceed one year, placed on probation and required to pay the costs of probation monitoring, or such other 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."

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

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Section 141 of the Code provides:

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

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

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, 2016 ¹ , 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 C4a ² 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		
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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	³ Phenylbutyrate 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 27	⁵ Amino acids are used by the body as a source of protein and nitrogen. Amino acid 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.		
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	(GORDON JOHNSON CROZIER, D.O.) ACCUSATION NO. 900-2021-000624		

(GORDON JOHNSON CROZIER, D.O.) ACCUSATION NO. 900-2021-000624

1	for Patient S.L.; digestive enzymes ⁷ , magnesium citrate ⁸ , adrenal complex, ⁹ omega-3 fatty acids, ¹⁰		
2	toxin binder, ¹¹ and Neuromag ¹² . (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 27	¹¹ Toxin binders are made up of selected silicates or yeast cells. They are used to reduce mycotoxicosis.		
28	¹² Neuromag is Magnesium L-Threonate. Neuromag supports healthy memory and cognition.		
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Í	(GORDON JOHNSON CROZIER, D.O.) ACCUSATION NO. 900-2021-000624		

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(GORDON JOHNSON CROZIER, D.O.) ACCUSATION NO. 900-2021-000624

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

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

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

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

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III

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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 Crika Calderon	
ERIKA CALDERON Executive Director	
Osteopathic Medical Board of California Department of Consumer Affairs State of California	
Complainant	
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6 (GORDON JOHNSON CROZIER, D.O.) ACCUSATION NO. 900-2021-000624	

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

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

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 Junk

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.

7012 2920 0000 1156 6352

Gordon Johnson Crozier, D.O.7012 2920 0000 1156 6345 and1301 Lake S. International Parkway, Suite 1041First Class MailLake Mary, Florida 32746-1409First Class Mail

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

First Class Mail

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

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