

copy

1 Emergency Medical Services Authority  
2 D. RAE DELONG  
3 Staff Counsel  
4 State Bar No. 213282  
5 1930 9<sup>th</sup> Street  
6 Sacramento, CA 95814  
7 Tel: (916) 322-4336  
8 Fax: (916) 445-0300  
9 Attorney for Complainant

10 BEFORE THE  
11 EMERGENCY MEDICAL SERVICES AUTHORITY  
12 STATE OF CALIFORNIA

<p>13 In the Matter of the Emergency Medical 14 Technician - Paramedic License Held by:</p> <p>15 <b>CHRISTOPHER M. FREEMAN</b> 16 P21082</p> <p>17 Respondent.</p>	<p>18 No. 04-246</p> <p>19 <b><u>ORDER FOR TEMPORARY</u></b> 20 <b><u>SUSPENSION PENDING</u></b> 21 <b><u>HEARING / ACCUSATION</u></b></p>
---	--

22 A. I, MAUREEN MCNEIL, Chief Emergency Medical Services Division of the  
23 State of California (EMS Authority), have been apprised of the facts and circumstances  
24 surrounding your submission of a fraudulent Riverside Community College (RCC)  
25 paramedic course completion record to the EMS Authority on or about April 14, 2004, in  
26 order to obtain your paramedic license which was issued on or about April 16, 2004. The  
27 specific allegations are:

1. You committed fraud in the procurement of your paramedic license by submitting a fraudulent RCC course completion certificate on or about April 14, 2004, in order to receive a paramedic license, in violation of Health and Safety Code section 1798.200(c)(1).

///

1           2. You committed fraudulent, dishonest, or corrupt acts when you  
2 submitted a fraudulent RCC course completion certificate on or about April 14, 2004, in  
3 order to receive a paramedic license, in violation of Health and Safety Code section  
4 1798.200(c)(5)

5           3. You committed fraudulent, dishonest, or corrupt acts by representing that  
6 you had a valid paramedic license and had completed the paramedic course at RCC, in an  
7 attempt to gain employment as a paramedic with Emergency Ambulance in Brea,  
8 California, in or about October 2004, in violation of Health and Safety Code section  
9 1798.200(c)(5).

10           4. You violated or attempted to violate directly or indirectly regulations  
11 adopted by the EMS Authority pertaining to prehospital personnel by failing to comply  
12 with California Code of Regulations, title 22, section 100164(a)(1), which provides that  
13 an applicant for initial paramedic licensure shall provide a course completion record from  
14 an approved paramedic training program, in violation of Health and Safety Code section  
15 1798.200(c)(7).

16           4. Your failure to demonstrate qualifications from an approved paramedic  
17 training program, as required by California Code of Regulations, title 22, section  
18 100164(a)(1), represents an imminent threat to public health or safety.

19           B. Health and Safety Code section 1798.202 provides that "the EMS Authority,  
20 after consultation with the relevant employer, may temporarily suspend, prior to hearing,  
21 any EMT-P license upon determination that: (1) the licensee has engaged in acts or  
22 omissions that constitute grounds for revocation of the EMT-P license; and (2) permitting  
23 the licensee to continue to engage in the licensed activity without restriction, would  
24 present an imminent threat to the public health or safety."

25           C. Based on the above, I find that:

26           1. If these allegations are true, such conduct constitutes grounds for  
27 revocation of your EMT-P license; and


1           2. Permitting you to maintain possession of the EMT-P license issued to  
2 you under fraudulent representations would present an imminent threat to the public  
3 health or safety.

4           3. Therefore, it is necessary to issue a temporary suspension order pursuant  
5 to Health and Safety Code section 1798.202.

6           YOUR EMT-P LICENSE IS SUSPENDED EFFECTIVE IMMEDIATELY.

7           4. Pursuant to Health and Safety Code section 1798.202, a hearing shall be  
8 held within 30 days of your filing a Notice of Defense. The temporary suspension will  
9 remain in effect through the holding of a hearing on the Accusation and until such time as  
10 the Director has made a final determination on the merits. However, the Temporary  
11 Suspension Order is deemed vacated if a final determination is not made within 15 days  
12 after the administrative law judge renders the proposed decision.

13  
14           Dated this 26th day of October, 2004.

15  
16             
17           MAUREEN MCNEIL  
18           Chief, Emergency Medical Services Division  
19           Emergency Medical Services Authority  
20           State of California

21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
Complainant