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6 BEFORE THE
7 EMERGENCY MEDICAL SERVICES AUTHORITY
8 OF THE STATE OF CALIFORNIA

9 In the Matter of the Accusation Against:) Enforcement Matter No.: 05-0319
10 DAVID LANNING)
License No.: P22967) ACCUSATION AND ORDER FOR
11 Respondent.) TEMPORARY SUSPENSION PENDING
HEARING

12 TO: RESPONDENT DAVID LANNING:

13 A. I, Cesar A. Aristeiguieta, M.D., Director of the Emergency Medical Services Authority
14 ("Authority"), have been apprised of the facts and circumstances by which you obtained your
15 EMT-P certificate from surrounding your admission to the addiction of narcotics. I find that:

16 1. On various dates on or about June 8, 2005 through on or about July 29, 2005,
17 while attending North Coast Paramedic Program, you knowingly forged signatures to falsely
18 document your clinical hours required to complete the paramedic course. Each act of forging a
19 signature on the clinical time sheet is a violation of Health and Safety Code Section
20 1798.200(c)(5).
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22 2. On various dates on or about June 8, 2004 through on or about July 29, 2004,
23 you purposely submitted your submitted fraudulent clinical rotation forms to the North Coast
24 Paramedic Program with the desire to obtain a course completion certificate, which was issued to
25 you on or about June 30, 2005. Your submission of the fraudulent document is a violation of
26 Health and Safety Code Section 1798.200(c)(1).

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1 3. On or about November 7, 2005, you submitted your fraudulently obtained
2 paramedic course completion certificate to the Authority to obtain your EMT-P license. You
3 signed the license application below the following statement:

4 "I hereby certify under penalty of perjury that all information on this application is
5 true and correct to the best of my knowledge and belief, and I understand that any
6 falsification or omission of material facts may cause forfeiture on my part of all rights
7 to paramedic licensure in the state of California. I understand all information on this
8 application is subject to verification, and I hereby give my express permission for the
9 EMS Authority to contact any person or agency for information related to my role
10 and function as a paramedic in California."

11 By your submission of the fraudulently obtained paramedic course completion certificate to
12 the Authority you violated Health and Safety Code Section 1798.200(c)(1).

13 4. On or about November 8, 2005, you submitted your fraudulently obtained EMT-P
14 license to the North Coast EMS Agency, with the intent to procure accreditation to work as a
15 paramedic. Your submission of the fraudulently obtained EMT-P license is in violation of Health
16 and Safety Code Section 1798.200(c)(1).

17 5. You have admitted to forging the signatures to fraudulently document about 40
18 hours of clinical time that submitted to obtain your paramedic course completion certificate, in
19 violation of Health and Safety Code sections 1798.200(c)(1) and (c)(5).

20 6. Your failure to complete the required hours of hospital clinical training does not
21 meet the basic requirements for licensure in the state of California, as required by California Code
22 of Regulations, Title 22, section 100164, and represents an imminent threat to the public health or
23 safety.
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25 B. Based on the above, I find that:

26 1. You have engaged in acts that constitute grounds for revocation of your EMT- P
27 license;
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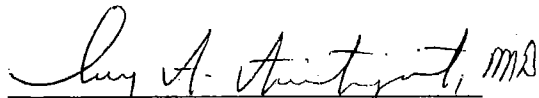
1 2. Permitting you to continue to engage in the licensed activity, would present an
2 imminent threat to the public health or safety.

3 C. Therefore, it is necessary to issue this Temporary Suspension Order pursuant to Health
4 and Safety Code Section 1798.202.

5 YOUR EMT-P LICENSE IS SUSPENDED

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

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13 DATED: December 23, 2005

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15 CESAR A. ARISTEIGUIETA, M.D.
16 Director
17 Emergency Medical Services Authority
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