

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

In the Matter of the Accusation  
Against:

Fares Jeries Rabadi, M.D.

Physician's and Surgeon's  
Certificate No. A 66578

Case No.: 800-2017-037241

Respondent.

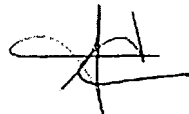
DECISION

The attached Stipulated Settlement and Disciplinary Order 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 September 30, 2021.

IT IS SO ORDERED: August 31, 2021.

MEDICAL BOARD OF CALIFORNIA



---

Alejandra Campoverdi, Vice Chair  
Panel B

1 MATTHEW RODRIQUEZ  
Acting Attorney General of California  
2 E. A. JONES III  
Supervising Deputy Attorney General  
3 JOSHUA M. TEMPLET  
Deputy Attorney General  
4 State Bar No. 267098  
California Department of Justice  
5 300 So. Spring Street, Suite 1702  
Los Angeles, CA 90013  
6 Telephone: (213) 269-6688  
Facsimile: (916) 731-2117  
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

13 **FARES JERIES RABADI, M.D.**  
14 **18350 Roscoe Blvd., Suite 514**  
**Northridge, CA 91325**

15 **Physician's and Surgeon's Certificate**  
16 **No. A 66578,**

17 Respondent.

Case No. 800-2017-037241

OAH No. 2020100884

**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER**

18  
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
20 entitled proceedings that the following matters are true:

21 **PARTIES**

22 1. William Prasifka (Complainant) is the Executive Director of the Medical Board of  
23 California (Board). He brought this action solely in his official capacity and is represented in this  
24 matter by Matthew Rodriguez, Acting Attorney General of the State of California, by Joshua M.  
25 Templet, Deputy Attorney General.

26 2. Respondent Fares Jeries Rabadi, M.D. (Respondent) is represented in this proceeding  
27 by attorney Albert J. Garcia, whose address is 2000 Powell Street, Suite 1290, Emeryville, CA  
28 94608.



1 10. Respondent agrees that, at a hearing, Complainant could establish a factual basis for  
2 the charges in the Accusation, and Respondent hereby gives up his right to contest those charges.

3 11. Respondent agrees that his Physician's and Surgeon's Certificate is subject to  
4 discipline and he agrees to be bound by the Board's probationary terms as set forth in the  
5 Disciplinary Order below.

6 **CONTINGENCY**

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

16 13. Respondent agrees that if he ever petitions for early termination or modification of  
17 probation, or if an accusation and/or petition to revoke probation is filed against him before the  
18 Board, all of the charges and allegations contained in the Accusation shall be deemed true,  
19 correct, and fully admitted by respondent for purposes of any such proceeding or any other  
20 licensing proceeding involving Respondent in the State of California.

21 14. This Stipulated Settlement and Disciplinary Order is intended by the parties herein to  
22 be an integrated writing representing the complete, final, and exclusive embodiment of the  
23 agreements of the parties in the above-entitled matter.

24 15. The parties understand and agree that Portable Document Format (PDF) and facsimile  
25 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile  
26 signatures thereto, shall have the same force and effect as the originals.

27 ///

28 ///



1 Respondent shall participate in and successfully complete the classroom component of the course  
2 not later than six (6) months after Respondent's initial enrollment. Respondent shall successfully  
3 complete any other component of the course within one (1) year of enrollment. The medical  
4 record keeping course shall be at Respondent's expense and shall be in addition to the Continuing  
5 Medical Education (CME) requirements for renewal of licensure.

6 A medical record keeping course taken after the acts that gave rise to the charges in the  
7 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board  
8 or its designee, be accepted towards the fulfillment of this condition if the course would have  
9 been approved by the Board or its designee had the course been taken after the effective date of  
10 this Decision.

11 Respondent shall submit a certification of successful completion to the Board or its  
12 designee not later than 15 calendar days after successfully completing the course, or not later than  
13 15 calendar days after the effective date of the Decision, whichever is later.

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

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

23 4. SUPERVISION OF PHYSICIAN ASSISTANTS AND ADVANCED PRACTICE  
24 NURSES. During probation, Respondent is prohibited from supervising physician assistants and  
25 advanced practice nurses.

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

1           6.    QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations  
2 under penalty of perjury on forms provided by the Board, stating whether there has been  
3 compliance with all the conditions of probation.

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

6           7.    GENERAL PROBATION REQUIREMENTS.

7           Compliance with Probation Unit

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

9           Address Changes

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

15          Place of Practice

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

19          License Renewal

20          Respondent shall maintain a current and renewed California physician's and surgeon's  
21 license.

22          Travel or Residence Outside California

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

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

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

4 9. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or  
5 its designee in writing within 15 calendar days of any periods of non-practice lasting more than  
6 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is  
7 defined as any period of time Respondent is not practicing medicine as defined in Business and  
8 Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month in direct  
9 patient care, clinical activity or teaching, or other activity as approved by the Board. If  
10 Respondent resides in California and is considered to be in non-practice, Respondent shall  
11 comply with all terms and conditions of probation. All time spent in an intensive training program  
12 which has been approved by the Board or its designee shall not be considered non-practice and  
13 does not relieve Respondent from complying with all the terms and conditions of probation.  
14 Practicing medicine in another state of the United States or Federal jurisdiction while on  
15 probation with the medical licensing authority of that state or jurisdiction shall not be considered  
16 non-practice. A Board-ordered suspension of practice shall not be considered as a period of non-  
17 practice.

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

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

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

25 Periods of non-practice for a Respondent residing outside of California will relieve  
26 Respondent of the responsibility to comply with the probationary terms and conditions with the  
27 exception of this condition and the following terms and conditions of probation: Obey All Laws;  
28 General Probation Requirements; and Quarterly Declarations.



1           10. COMPLETION OF PROBATION. Respondent shall comply with all financial  
2 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the  
3 completion of probation. Upon successful completion of probation, Respondent's certificate shall  
4 be fully restored.

5           11. VIOLATION OF PROBATION. Failure to fully comply with any term or condition  
6 of probation is a violation of probation. If Respondent violates probation in any respect, the  
7 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and  
8 carry out the disciplinary order that was stayed. If an Accusation, or Petition to Revoke Probation,  
9 or an Interim Suspension Order is filed against Respondent during probation, the Board shall have  
10 continuing jurisdiction until the matter is final, and the period of probation shall be extended until  
11 the matter is final.

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

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

27           14. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for  
28 a new license or certification, or petition for reinstatement of a license, by any other health care

1 licensing action agency in the State of California, all of the charges and allegations contained in  
2 the Accusation shall be deemed to be true, correct, and admitted by Respondent for the purpose of  
3 any Statement of Issues or any other proceeding seeking to deny or restrict license.

4 **ACCEPTANCE**


5 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
6 discussed it with my attorney, Albert J. Garcia. I understand the stipulation and the effect it will  
7 have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and  
8 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
9 Decision and Order of the Medical Board of California.

10  
11 DATED: 4/22/2021

  
12 FARES JERIES RABADI, M.D.  
Respondent

13 I have read and fully discussed with Respondent Fares Jeries Rabadi, M.D. the terms and  
14 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.  
15 I approve its form and content.

16 DATED: April 22, 2021

  
17 ALBERT J. GARCIA  
Attorney for Respondent

18  
19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

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

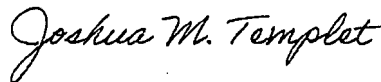
**ENDORSEMENT**

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

DATED: April 23, 2021

Respectfully submitted,

MATTHEW RODRIQUEZ  
Acting Attorney General of California  
E. A. JONES III  
Supervising Deputy Attorney General



JOSHUA M. TEMPLET  
Deputy Attorney General  
*Attorneys for Complainant*

LA2020601868  
35036436

**Exhibit A**

**Accusation No. 800-2017-037241**

1 XAVIER BECERRA  
Attorney General of California  
2 E. A. JONES III  
Supervising Deputy Attorney General  
3 JOSHUA M. TEMPLET  
Deputy Attorney General  
4 State Bar No. 267098  
California Department of Justice  
5 300 So. Spring Street, Suite 1702  
Los Angeles, CA 90013  
6 Telephone: (213) 269-6688  
Facsimile: (916) 731-2117  
7 E-mail: Joshua.Templet@doj.ca.gov  
*Attorneys for Complainant*  
8

9  
10 **BEFORE THE**  
**MEDICAL BOARD OF CALIFORNIA**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**  
12

13 In the Matter of the Accusation Against:

Case No. 800-2017-037241

14 **Fares Jeries Rabadi, M.D.**  
18350 Roscoe Blvd., Suite 514  
15 Northridge, CA 91325

**A C C U S A T I O N**

16 **Physician's and Surgeon's Certificate**  
17 **No. A 66578,**

Respondent.  
18

19  
20 **PARTIES**

21 1. William Prasifka (Complainant) brings this Accusation solely in his official capacity  
22 as the Executive Director of the Medical Board of California, Department of Consumer Affairs  
23 (Board).

24 2. On September 25, 1998, the Board issued Physician's and Surgeon's Certificate  
25 Number A 66578 to Fares Jeries Rabadi, M.D. (Respondent). The Physician's and Surgeon's  
26 Certificate was in full force and effect at all times relevant to the charges brought herein and will  
27 expire on May 31, 2022, unless renewed.

28 ///

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 2004 of the Code provides that the Board shall have the responsibility for the  
6 enforcement of the disciplinary and criminal provisions of the Medical Practice Act.

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

11 6. At all times relevant to this matter, Respondent was licensed and practicing medicine  
12 in California.

13 **STATUTORY PROVISIONS**

14 7. Section 2234 of the Code states:

15 The board shall take action against any licensee who is charged with unprofessional  
16 conduct. In addition to other provisions of this article, unprofessional conduct  
includes, but is not limited to, the following:

17 (a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the  
18 violation of, or conspiring to violate any provision of this chapter.

19 (b) Gross negligence.

20 (c) Repeated negligent acts. To be repeated, there must be two or more negligent acts  
21 or omissions. An initial negligent act or omission followed by a separate and distinct  
departure from the applicable standard of care shall constitute repeated negligent acts.

22 (1) An initial negligent diagnosis followed by an act or omission medically  
appropriate for that negligent diagnosis of the patient shall constitute a single  
23 negligent act.

24 (2) When the standard of care requires a change in the diagnosis, act, or omission that  
constitutes the negligent act described in paragraph (1), including, but not limited to,  
25 a reevaluation of the diagnosis or a change in treatment, and the licensee's conduct  
departs from the applicable standard of care, each departure constitutes a separate and  
26 distinct breach of the standard of care.

27 ...

1 8. Section 2266 of the Code states that the failure of a physician to maintain adequate  
2 and accurate records relating to the provision of services to his patients constitutes unprofessional  
3 conduct.

4 **FACTUAL ALLEGATIONS**

5 9. Respondent practices internal medicine as a primary care physician.

6 **Patient P-1**

7 10. Patient P-1<sup>1</sup> was 39-years old when Respondent began treating him, in July 2008.  
8 Respondent saw P-1 on an almost monthly basis from January 2014 through December 2017 and  
9 treated him for chronic neck and low back pain and generalized anxiety disorder. Respondent also  
10 diagnosed P-1 with opioid dependency.

11 11. Respondent's treatment records for P-1 are handwritten and barely legible, with  
12 minimal information. The only vital sign that Respondent documented is blood pressure, and the  
13 only physical examination he documented is of the patient's lungs, heart, and sometimes  
14 abdomen. In his records for each of the patient's visits, Respondent documented "refusing detox"  
15 and continuing to prescribe the patient Norco<sup>2</sup>® tablets to be taken every six hours or as needed  
16 for his chronic neck and low back pain, and Xanax<sup>3</sup>® 2 mg tablets to be taken every eight hours  
17 or as needed for his generalized anxiety disorder.

18  
19 <sup>1</sup> The patients are designated in this document as P-1 and P-2 to protect their privacy. Respondent  
20 knows the names of the patients and can confirm their identities through discovery.

21 <sup>2</sup> Norco® is a trade name of hydrocodone-acetaminophen, a combination of two pain  
22 medications: hydrocodone bitartrate, a semisynthetic narcotic, and acetaminophen (trade names  
23 of which include Tylenol®). The tablets that Respondent prescribed P-1 contained 10 mg of  
24 hydrocodone bitartrate and 325 mg of acetaminophen. Effective October 6, 2014, the Drug  
25 Enforcement Administration (DEA) placed hydrocodone-acetaminophen on Schedule II of the  
26 Controlled Substances Act pursuant to title 21 of the Code of Federal Regulations, section  
27 1308.12, subdivision (b)(1)(vi). The DEA had previously classified it as a Schedule III controlled  
28 substance. Hydrocodone-acetaminophen is a dangerous drug as defined in Code section 4022, and  
a Schedule III controlled substance pursuant to Health and Safety Code section 11056,  
subdivision (e).

<sup>3</sup> Xanax® is a trade name of alprazolam, a benzodiazepine. It is a psychotropic drug used to treat  
anxiety and panic disorders. The DEA placed it on Schedule IV of the Controlled Substances Act  
pursuant to title 21 of the Code of Federal Regulations, section 1308.14, subdivision (c)(2).  
Alprazolam is a dangerous drug as defined in section 4022, and a Schedule IV controlled  
substance pursuant to Health and Safety Code section 11057, subdivision (d)(1).

1 12. Prescribing records apart from those maintained by Respondent confirm that each  
2 month he prescribed 100 Norco® tablets and 90 Xanax® 2 mg tablets to P-1.

3 **Patient P-2**

4 13. Patient P-2 was 59-years old when Respondent began treating her, in approximately  
5 August 2009. According to Respondent's records of his treatment of P-2 between December 2013  
6 and December 2017, he treated her for chronic neck and low back pain, generalized anxiety  
7 disorder, and chronic insomnia, among other conditions.

8 14. Respondent's treatment records for P-2 are handwritten and barely legible, with  
9 minimal information. The only vital sign that Respondent documented is blood pressure, and the  
10 only physical examination he documented is of the patient's lungs, heart, and sometimes  
11 abdomen. Respondent documented regularly prescribing the patient, for years, Xanax® 0.25 mg  
12 tablets to be taken daily or as needed for her generalized anxiety disorder, and two Dalmane<sup>4</sup>® 15  
13 mg tablets every evening or as needed for her chronic insomnia.

14 **FIRST CAUSE FOR DISCIPLINE**

15 **(Gross Negligence)**

16 15. Respondent is subject to disciplinary action under section 2234, subdivision (b), of  
17 the Code, because he engaged in the following acts of gross negligence in the care and treatment  
18 of patients P-1 and P-2, as alleged above:

19 A. Respondent's continued prescribing of controlled substances to P-1, whom he  
20 diagnosed with opioid dependency, without a plan to taper him off controlled  
21 substances, without monitoring his compliance with the tapering plan through  
22 toxicology screening and by checking CURES<sup>5</sup>, and without referring the patient to and

23 <sup>4</sup> Dalmane® is a trade name of flurazepam, a benzodiazepine. It is a psychotropic drug used to  
24 treat insomnia. The DEA placed it on Schedule IV of the Controlled Substances Act pursuant to  
25 title 21 of the Code of Federal Regulations, section 1308.14, subdivision (c)(25). Flurazepam is a  
26 dangerous drug as defined in section 4022, and a Schedule IV controlled substance pursuant to  
27 Health and Safety Code section 11057, subdivision (d)(14).

28 <sup>5</sup> The Controlled Substance Utilization Review and Evaluation System (CURES) is a database of  
scheduled controlled substance prescriptions meant to reduce prescription drug abuse and  
diversion by making a patient's prescribing information accessible by each of his health care  
providers. Among other information, CURES shows each prescription written for and filled by a  
patient.



1 confirming his treatment by a pain management physician, was an extreme departure  
2 from the standard of care.

3 B. Respondent's failure to document the following elements of his treatment of P-1 was an  
4 extreme departure from the standard of care:

- 5 a. Clinical indications and potential contraindications for the controlled substances  
6 that he prescribed to P-1;
- 7 b. P-1's clinical response to the prescribed medications;
- 8 c. P-1's history of controlled substance use, including prior failed trials and  
9 contraindications;
- 10 d. P-1's history of alternative and complementary treatment, including  
11 psychotherapy, cognitive behavioral therapy, stress reduction techniques,  
12 meditation, exercise, physical therapy, use of a TENS unit, acupuncture, trigger  
13 point injections, epidural steroid injections, or other non-medication-based pain  
14 management modalities; and
- 15 e. Respondent's routine monitoring of the patient's use of controlled substances as  
16 prescribed, including through toxicology screening and by checking CURES.

17 C. Respondent's long term prescribing of narcotics and benzodiazepines to P-1, the  
18 combination of which results in a high risk of profound sedation, respiratory depression,  
19 coma, and even death, was an extreme departure from the standard of care.

20 D. Respondent's failure to document the following elements of his treatment of P-2 was an  
21 extreme departure from the standard of care:

- 22 a. Clinical indications and potential contraindications for the controlled substances  
23 that he prescribed to P-2;
- 24 b. P-2's clinical response to the prescribed medications;
- 25 c. P-2's history of controlled substance use, including prior failed trials and  
26 contraindications;
- 27 d. P-2's history of alternative and complementary treatment, including  
28 psychotherapy, cognitive behavioral therapy, stress reduction techniques,

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

meditation, exercise, physical therapy, use of a TENS unit, acupuncture, trigger point injections, epidural steroid injections, or other non-medication-based pain management modalities; and

e. Respondent's routine monitoring of the patient's use of controlled substances as prescribed, including through toxicology screening and by checking CURES.

**SECOND CAUSE FOR DISCIPLINE**

**(Repeated Negligent Acts)**

16. Respondent is subject to disciplinary action under section 2234, subdivision (c), of the Code, because he engaged in repeated negligent acts in his care and treatment of patients P-1 and P-2. These acts include those alleged in the First Cause for Discipline.

**THIRD CAUSE FOR DISCIPLINE**

**(Inadequate Records)**

17. Respondent is subject to disciplinary action under section 2266 of the Code, because he failed to maintain adequate records of the medical services that he provided to patients P-1 and P-2, as alleged above.

**PRAYER**

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

1. Revoking or suspending Physician's and Surgeon's Certificate Number A 66578, issued to Fares Jeries Rabadi, M.D.;
2. Revoking, suspending, or denying approval of Fares Jeries Rabadi, M.D.'s authority to supervise physician assistants and advanced practice nurses;

///  
///  
///  
///  
///

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

3. Ordering Fares Jeries Rabadi, M.D., if placed on probation, to pay the Board the costs of probation monitoring; and

4. Taking such other and further action as deemed necessary and proper.

DATED: SEP 29 2020



\_\_\_\_\_  
WILLIAM PRASIFKA  
Executive Director  
Medical Board of California  
Department of Consumer Affairs  
State of California  
*Complainant*

LA2020601868  
63619660.docx