

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

In the Matter of the First Amended
Accusation Against:

Youmna M. Abdulhadi, M.D.

Physician's and Surgeon's
Certificate No. C 55715

Respondent.

Case No.: 800-2022-085470

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 1, 2023.

IT IS SO ORDERED: August 3, 2023.

MEDICAL BOARD OF CALIFORNIA



Laurie Rose Lubiano, J.D., Chair
Panel A

1 ROB BONTA
Attorney General of California
2 ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
3 KEITH C. SHAW
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8 *Attorneys for Complainant*

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

14 In the Matter of the First Amended Accusation
Against:
15 **YOUNNA M. ABDULHADI, M.D.**
16 **140 Boomer Pl, #307**
Chula Vista, CA 91910
17 **Physician's and Surgeon's Certificate No. C**
18 **55715**
19 Respondent.

Case No. 800-2022-085470
OAH No. 2022120567
**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

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

23 **PARTIES**

24 1. William Prasifka (Complainant) was the Executive Director of the Medical Board of
25 California (Board) and brought this action solely in his official capacity. Reji Varghese is
26 presently the Interim Executive Director of the Medical Board of California and is represented in
27 this matter by Rob Bonta, Attorney General of the State of California, by Keith C. Shaw, Deputy
28 Attorney General.

1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. C 55715 issued
3 to Respondent Youmna M. Abdulhadi, M.D., is revoked. However, the revocation is stayed and
4 Respondent is placed on probation for seven (7) years from the effective date of the Decision on
5 the following terms and conditions:

6 1. **PSYCHIATRIC EVALUATION.** Within 30 calendar days of the effective date of
7 this Decision, and on whatever periodic basis thereafter may be required by the Board or its
8 designee, Respondent shall undergo and complete a psychiatric evaluation (and psychological
9 testing, if deemed necessary) by a Board-appointed, board-certified psychiatrist, who shall
10 consider any information provided by the Board or designee and any other information the
11 psychiatrist deems relevant, and shall furnish a written evaluation report to the Board or its
12 designee. Psychiatric evaluations conducted prior to the effective date of the Decision shall not
13 be accepted towards the fulfillment of this requirement. Respondent shall pay the cost of all
14 psychiatric evaluations and psychological testing.

15 Respondent shall comply with all restrictions or conditions recommended by the evaluating
16 psychiatrist within 15 calendar days after being notified by the Board or its designee.

17 2. **PSYCHIATRIC TREATMENT.** Within 60 calendar days of the effective date of this
18 Decision, Respondent shall submit to the Board or its designee for prior approval the name and
19 qualifications of a California-licensed, board certified psychiatrist. Upon approval, Respondent
20 shall undergo and continue regular psychiatric treatment, including any modifications to the
21 frequency of psychiatric treatment, until the Board or its designee deems that no further
22 psychiatric treatment is necessary.

23 The psychiatrist shall consider any information provided by the Board or its designee and
24 any other information the psychiatrist deems relevant and shall furnish a written evaluation report
25 to the Board or its designee. Respondent shall cooperate in providing the psychiatrist with any
26 information and documents that the psychiatrist may deem pertinent.

27 Respondent shall have the treating psychiatrist submit quarterly status reports to the Board
28 or its designee. The Board or its designee may require Respondent to undergo further psychiatric

1 evaluations by a Board-appointed board certified psychiatrist. If, prior to the completion of
2 probation, Respondent is found to be mentally unfit to resume the practice of medicine without
3 restrictions, the Board shall retain continuing jurisdiction over Respondent's license and the
4 period of probation shall be extended until the Board determines that Respondent is mentally fit
5 to resume the practice of medicine without restrictions.

6 Respondent shall pay the cost of all psychiatric treatment and psychiatric evaluations.

7 3. MONITORING - PRACTICE. Within 30 calendar days of the effective date of this
8 Decision, Respondent shall submit to the Board or its designee for prior approval as a practice
9 monitor, the name and qualifications of one or more licensed physicians and surgeons whose
10 licenses are valid and in good standing, and who are preferably American Board of Medical
11 Specialties (ABMS) certified. A monitor shall have no prior or current business or personal
12 relationship with Respondent, or other relationship that could reasonably be expected to
13 compromise the ability of the monitor to render fair and unbiased reports to the Board, including
14 but not limited to any form of bartering, shall be in Respondent's field of practice, and must agree
15 to serve as Respondent's monitor. Respondent shall pay all monitoring costs.

16 The Board or its designee shall provide the approved monitor with copies of the Decision
17 and First Amended Accusation, and a proposed monitoring plan. Within 15 calendar days of
18 receipt of the Decision, Accusation, and proposed monitoring plan, the monitor shall submit a
19 signed statement that the monitor has read the Decision and First Amended Accusation, fully
20 understands the role of a monitor, and agrees or disagrees with the proposed monitoring plan. If
21 the monitor disagrees with the proposed monitoring plan, the monitor shall submit a revised
22 monitoring plan with the signed statement for approval by the Board or its designee.

23 Within 60 calendar days of the effective date of this Decision, and continuing throughout
24 probation, Respondent's practice shall be monitored by the approved monitor. Respondent shall
25 make all records available for immediate inspection and copying on the premises by the monitor
26 at all times during business hours and shall retain the records for the entire term of probation.

27 If Respondent fails to obtain approval of a monitor within 60 calendar days of the effective
28 date of this Decision, Respondent shall receive a notification from the Board or its designee to

1 cease the practice of medicine within three (3) calendar days after being so notified. Respondent
2 shall cease the practice of medicine until a monitor is approved to provide monitoring
3 responsibility.

4 The monitor shall submit a quarterly written report to the Board or its designee which
5 includes an evaluation of Respondent's performance, indicating whether Respondent's practices
6 are within the standards of practice of medicine and whether Respondent is practicing medicine
7 safely. It shall be the sole responsibility of Respondent to ensure that the monitor submits the
8 quarterly written reports to the Board or its designee within 10 calendar days after the end of the
9 preceding quarter.

10 If the monitor resigns or is no longer available, Respondent shall, within 5 calendar days of
11 such resignation or unavailability, submit to the Board or its designee, for prior approval, the
12 name and qualifications of a replacement monitor who will be assuming that responsibility within
13 15 calendar days. If Respondent fails to obtain approval of a replacement monitor within 60
14 calendar days of the resignation or unavailability of the monitor, Respondent shall receive a
15 notification from the Board or its designee to cease the practice of medicine within three (3)
16 calendar days after being so notified. Respondent shall cease the practice of medicine until a
17 replacement monitor is approved and assumes monitoring responsibility.

18 4. SOLO PRACTICE PROHIBITION. Respondent is prohibited from engaging in the
19 solo practice of medicine. Prohibited solo practice includes, but is not limited to, a practice
20 where: 1) Respondent merely shares office space with another physician but is not affiliated for
21 purposes of providing patient care, or 2) Respondent is the sole physician practitioner at that
22 location.

23 If Respondent fails to establish a practice with another physician or secure employment in
24 an appropriate practice setting within 60 calendar days of the effective date of this Decision,
25 Respondent shall receive a notification from the Board or its designee to cease the practice of
26 medicine within three (3) calendar days after being so notified. The Respondent shall not resume
27 practice until an appropriate practice setting is established.

28 If, during the course of the probation, the Respondent's practice setting changes and the

1 Respondent is no longer practicing in a setting in compliance with this Decision, the Respondent
2 shall notify the Board or its designee within five (5) calendar days of the practice setting change.
3 If Respondent fails to establish a practice with another physician or secure employment in an
4 appropriate practice setting within 60 calendar days of the practice setting change, Respondent
5 shall receive a notification from the Board or its designee to cease the practice of medicine within
6 three (3) calendar days after being so notified. Respondent shall not resume practice until an
7 appropriate practice setting is established.

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

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

17 6. SUPERVISION OF PHYSICIAN ASSISTANTS AND ADVANCED PRACTICE
18 NURSES. During probation, Respondent is prohibited from supervising physician assistants and
19 advanced practice nurses.

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

23 8. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby
24 ordered to reimburse the Board its costs of investigation and enforcement, including, but not
25 limited to, expert review, amended accusations, legal reviews, investigation(s), and subpoena
26 enforcement, as applicable, in the amount of \$26,102.00 (twenty-six thousand one hundred two
27 dollars). Costs shall be payable to the Medical Board of California. Failure to pay such costs
28 shall be considered a violation of probation.

1 Payment must be made in full within 30 calendar days of the effective date of the Order, or
2 by a payment plan approved by the Medical Board of California. Any and all requests for a
3 payment plan shall be submitted in writing by respondent to the Board. Failure to comply with
4 the payment plan shall be considered a violation of probation.

5 The filing of bankruptcy by respondent shall not relieve respondent of the responsibility to
6 repay investigation and enforcement costs, including expert review costs.

7 9. QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations
8 under penalty of perjury on forms provided by the Board, stating whether there has been
9 compliance with all the conditions of probation. Respondent shall submit quarterly declarations
10 not later than 10 calendar days after the end of the preceding quarter.

11 10. GENERAL PROBATION REQUIREMENTS.

12 Compliance with Probation Unit

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

14 Address Changes

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

20 Place of Practice

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

24 License Renewal

25 Respondent shall maintain a current and renewed California physician's and surgeon's
26 license.

27 Travel or Residence Outside California

28 Respondent shall immediately inform the Board or its designee, in writing, of travel to any

1 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than thirty
2 (30) calendar days.

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

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

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

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

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

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

2 Periods of non-practice for a Respondent residing outside of California will relieve
3 Respondent of the responsibility to comply with the probationary terms and conditions with the
4 exception of this condition and the following terms and conditions of probation: Obey All Laws;
5 General Probation Requirements; Quarterly Declarations; Abstain from the Use of Alcohol and/or
6 Controlled Substances; and Biological Fluid Testing..

7 13. COMPLETION OF PROBATION. Respondent shall comply with all financial
8 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
9 completion of probation. This term does not include cost recovery, which is due within 30
10 calendar days of the effective date of the Order, or by a payment plan approved by the Medical
11 Board and timely satisfied. Upon successful completion of probation, Respondent's certificate
12 shall be fully restored.

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

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

1 application shall be treated as a petition for reinstatement of a revoked certificate.


2 16. PROBATION MONITORING COSTS. Respondent shall pay the costs associated
3 with probation monitoring each and every year of probation, as designated by the Board, which
4 may be adjusted on an annual basis. Such costs shall be payable to the Medical Board of
5 California and delivered to the Board or its designee no later than January 31 of each calendar
6 year.

7 17. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for
8 a new license or certification, or petition for reinstatement of a license, by any other health care
9 licensing action agency in the State of California, all of the charges and allegations contained in
10 First Amended Accusation No. 800-2022-085470 shall be deemed to be true, correct, and
11 admitted by Respondent for the purpose of any Statement of Issues or any other proceeding
12 seeking to deny or restrict license.

13 ACCEPTANCE

14 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
15 discussed it with my attorney, Albert W. Arena, Esq. I understand the stipulation and the effect it
16 will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and
17 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
18 Decision and Order of the Medical Board of California.

19 DATED: 5/26/23


Youmna Abdulhadi (May 26, 2023 12:46 PDT)

20 YOUMNA M. ABDULHADI, M.D.
21 *Respondent*

22 I have read and fully discussed with Respondent Youmna M. Abdulhadi, M.D., the terms
23 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
24 Order. I approve its form and content.

25 DATED: May 26, 2023

26 
27 ALBERT W. ARENA, ESQ.
28 *Attorney for Respondent*

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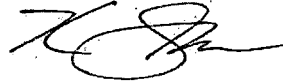
ENDORSEMENT

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

DATED: May 26, 2023

Respectfully submitted,

ROB BONTA
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General



KEITH C. SHAW
Deputy Attorney General
Attorneys for Complainant

SD2022303906

Exhibit A

First Amended Accusation No. 800-2022-085470

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8 *Attorneys for Complainant*

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

14 In the Matter of the First Amended Accusation
Against:

Case No. 800-2022-085470

15 **YOUMNA M. ABDULHADI, M.D.**
16 **140 Boomer Place, #307**
17 **Chula Vista, CA 91910**

FIRST AMENDED ACCUSATION

18 **Physician's and Surgeon's Certificate**
19 **No. C 55715,**

Respondent.

20
21 **PARTIES**

22 1. Reji Varghese (Complainant) brings this First Amended Accusation solely in his
23 official capacity as the Interim Executive Director of the Medical Board of California,
24 Department of Consumer Affairs (Board).

25 2. On or about January 23, 2013, the Medical Board issued Physician's and Surgeon's
26 Certificate No. C 55715 to Youmna M. Abdulhadi, M.D. (Respondent). The Physician's and
27 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
28 herein and will expire on October 31, 2024, unless renewed.

1 **JURISDICTION**

2 3. This First Amended Accusation is brought before the Board, under the authority of
3 the following laws. All section references are to the Business and Professions Code (Code)
4 unless otherwise 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 or her license revoked, suspended for a period not to exceed
7 one 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, states in part:

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

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

15 6. Section 2229 of the Code states that the protection of the public shall be the highest
16 priority for the Board in exercising their disciplinary authority. While attempts to rehabilitate a
17 licensee should be made when possible, Section 2229, subdivision (c), states that when
18 rehabilitation and protection are inconsistent, protection shall be paramount.

19 7. Section 822 of the Code provides that if the Board determines that a licensee's ability
20 to practice his or her profession safely is impaired because the licensee is mentally ill, or
21 physically ill affecting competency, the Board may take action by revoking or suspending the
22 license, placing the licensee on probation, or taking such other action as the Board in its
23 discretion deems proper.

24 **COST RECOVERY**

25 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
26 administrative law judge to direct a licensee found to have committed a violation or violations of
27 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
28 enforcement of the case, with failure of the licensee to comply subjecting the license to not being

1 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
2 included in a stipulated settlement.

3 **CAUSE FOR ACTION**

4 **(Mental or Physical Impairment)**

5 9. Respondent is subject to action pursuant to Section 822 of the Code, in that her ability
6 to practice medicine safely is impaired because she has a mental illness affecting competency.
7 The circumstances are as follows:

8 10. Respondent and Dr. X¹ had previously been colleagues, but were never romantically
9 involved or married. Beginning in approximately January 2022, Respondent began sending Dr. X
10 inappropriate and incoherent emails and text messages that were sexual in nature. Dr. X informed
11 Respondent that he wanted no form of contact with her and blocked her from his contacts.
12 Respondent then sent Dr. X a prenuptial agreement even though there was never any discussion
13 about marriage and Dr. X had repeatedly told Respondent that he wanted nothing to do with her.

14 11. In approximately January 2022, Respondent suddenly appeared at Dr. X's medical
15 office and told office staff that she had married Dr. X and she would be seeing his patients. In
16 response, Dr. X filed a temporary restraining order (TRO) against Respondent, which prohibited
17 Respondent from contacting Dr. X, either directly or indirectly. Despite the TRO, Respondent
18 continued to come to Dr. X's home, office, and message his girlfriend on social media.

19 12. In approximately February 2022, Dr. X obtained a civil harassment order (CHO)
20 against Respondent, which prohibited Respondent from contacting Dr. X directly or indirectly,
21 and required that she stay at least 500 yards away from Dr. X, his home, and his place of work.
22 Around this time, Respondent also informed Dr. X that she had legally changed her last name to
23 his last name.

24 13. On or about March 16, 2022, Respondent was served with the CHO. On or about
25 March 17, 2022, Respondent came into Dr. X's office and demanded to see Dr. X. She forced her
26 way past office staff and barged into Dr. X's office. She exclaimed to Dr. X, "you're my

27 ¹ The individual listed in this document is unnamed to protect his privacy. Respondent
28 knows the name of this individual and can confirm his identity through discovery.

1 husband,” and chased him around the office and began pushing him. Office staff intervened and
2 Dr. X ran into the parking lot, where Respondent followed. Dr. X escaped Respondent by
3 running back into the building and holding the door shut so that Respondent could not gain entry.

4 14. The same day, Respondent was arrested for violating the CHO. She made
5 nonsensical statements to the officers, including that she was a machine, pledging her allegiance
6 to the “CIA and US,” and Dr. X was her husband. Respondent had in her possession proof that
7 she legally changed her last name to Dr. X’s last name on or about February 28, 2022. Following
8 her arrest, Respondent continued to contact Dr. X.

9 15. Respondent was charged in San Diego County Superior Court with three
10 misdemeanor counts of violating the CHO, pursuant to Penal Code section 273.6, subdivision (a).
11 On or about August 15, 2022, Respondent was found to be not mentally competent to stand trial
12 following a competency evaluation. It was determined that Respondent displays symptoms of a
13 severe mental disorder, including delusional beliefs, disorganized thought process, and
14 disorganized speech, with a diagnostic impression of Unspecified Schizophrenia Spectrum and
15 other psychotic disorders. The evaluator noted that Respondent’s judgment is poor and insight
16 into her mental illness is poor.

17 16. In an unrelated incident, on or about February 2, 2022, Respondent returned to a
18 medical clinic that she was previously employed without any notice. Respondent told the office
19 manager that she had purchased the clinic, even though she had not, and that she was not ready to
20 see patients. The police were called and Respondent was escorted from the clinic. She stated
21 upon her departure, “I’ll be back.”

22 17. On or about January 27, 2023, Respondent underwent a voluntary mental evaluation
23 with a Board-appointed psychiatrist. On or about March 28, 2023, the Board expert concluded
24 that Respondent is unsafe to practice medicine as a result of a mental illness affecting
25 competency. The Board expert determined that Respondent has a diagnosis of Bipolar I disorder,
26 with psychotic features, which impairs her ability to safely practice medicine. The expert
27 recommended that due to the serious nature of Respondent’s bipolar disorder, she requires
28

1 ongoing treatment, monitoring, as well as practice restrictions and conditions, to ensure that she
2 can safely return to the practice of medicine.

3 **CAUSE FOR DISCIPLINE**

4 **(Unprofessional Conduct)**

5 18. Respondent is subject to disciplinary action under sections 2227 and 2234, as defined
6 by section 2234, subdivision (a), of the Code, in that she engaged in unprofessional conduct, as
7 more particularly alleged in paragraphs 10 through 16, above, which are hereby incorporated by
8 reference and realleged as if fully set forth herein.

9 **PRAYER**

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

12 1. Revoking or suspending Physician's and Surgeon's Certificate No. C 55715, issued to
13 Youmna M. Abdulhadi, M.D.;

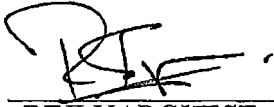
14 2. Revoking, suspending or denying approval of Youmna M. Abdulhadi, M.D.'s
15 authority to supervise physician assistants and advanced practice nurses;

16 3. Ordering Youmna M. Abdulhadi, M.D., to pay the Board the costs of the
17 investigation and enforcement of this case, and if placed on probation, the costs of probation
18 monitoring;

19 4. Taking action as authorized by section 822 of the Code as the Medical Board, in its
20 discretion, deems necessary and proper; and

21 5. Taking such other and further action as deemed necessary and proper.

22
23 DATED: MAY 02 2023

24 
25 _____
26 REJI VARGHESE
27 Interim Executive Director
28 Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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