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

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In the Matter of the Accusation Against:

Adelina Vorperian, M.D. 7341 Foothill Blvd., Suite 203 Tuiunga, CA 91042-2720

Physician's and Surgeon's Certificate No. C 50390

Respondent.

Case No. 800-2018-042937

AGREEMENT FOR SURRENDER OF LICENSE

TO ALL PARTIES:

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

- 1. Complainant, Reji Varghese, is the Executive Director of the Medical Board of California, Department of Consumer Affairs: ("Board").
- 2. Adelina Vorperian, M.D. ("Respondent") has carefully read and fully understands the effect of this Agreement.
- 3. Respondent understands that by signing this Agreement she is enabling the Board to issue this order accepting the surrender of license without further process. Respondent understands and agrees that Board staff and counsel for complainant may communicate directly with the Board regarding this Agreement, without notice to or participation by Respondent. The Board will not be disqualified from further action in this matter by virtue of its consideration of this Agreement.
- 4. Respondent acknowledges there is current disciplinary action against her license, that on January 25, 2021, an Accusation was filed against her and on April 8, 2022, a Decision was rendered wherein her license was revoked, with the

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revocation stayed, and placed on three years' probation with various standard terms and conditions.

- 5. The current disciplinary action provides in pertinent part, "Following the effective date of this Decision, if Respondent ceases practicing due to retirement, health reasons, or is otherwise unable to satisfy the terms and conditions of probation, Respondent may request voluntary surrender of Respondent's license." (Condition #17).
- 6. Upon acceptance of the Agreement by the Board, Respondent understands she will no longer be permitted to practice as a physician and surgeon in California, and also agrees to surrender her wallet certificate, wall license and any D.E.A. Certificate(s) for an address in California.
- 7. Respondent fully understands and agrees that if Respondent ever files an application for relicensure or reinstatement in the State of California, the Board shall treat it as a Petition for Reinstatement of a revoked license in effect at the time the Petition is filed. In addition, any Medical Board Investigation Report(s), including all referenced documents and other exhibits, upon which the Board is predicated, and any such Investigation Report(s), attachments, and other exhibits, that may be generated subsequent to the filing of this Agreement for Surrender of License, shall be admissible as direct evidence, and any time-based defenses, such as laches or any applicable statute of limitations, shall be waived when the Board determines whether to grant or deny the Petition.

ACCEPTANCE

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Adelina Yorperián, M.D.	Date
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Reji Varghese	Date
Executive Director	
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