

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

In the Matter of the Accusation
Against:

Chickkiah Padmanabhan, M.D.

Physician's and Surgeon's
Certificate No. A 38887

Respondent.

Case No. 800-2021-077677

DECISION

The attached Stipulated Surrender of License and 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 January 19, 2024.

IT IS SO ORDERED December 21, 2023.

MEDICAL BOARD OF CALIFORNIA

JENNA JONEV KORE
Reji Varghese
Executive Director

1 ROB BONTA
Attorney General of California
2 JUDITH T. ALVARADO
Supervising Deputy Attorney General
3 LATRICE R. HEMPHILL
Deputy Attorney General
4 State Bar No. 285973
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6198
6 Facsimile: (916) 731-2117
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

Case No. 800-2021-077677

13 **CHICKKIAH PADMANABHAN, M.D.**
14 **44215 15th Street West, Suite 207**
15 **Lancaster, CA 93534**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

16 **Physician's and Surgeon's Certificate**
17 **No. A 38887,**

Respondent.

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

20 **PARTIES**

21 1. Reji Varghese (Complainant) is the Executive Director of the Medical Board of
22 California (Board). He brought this action solely in his official capacity and is represented in this
23 matter by Rob Bonta, Attorney General of the State of California, by Latrice R. Hemphill, Deputy
24 Attorney General.

25 2. CHICKKIAH PADMANABHAN, M.D. (Respondent) is represented in this
26 proceeding by attorney Vincent Maeder, Esq., whose address is: 1851 East First Street, Suite
27 750, Santa Ana, CA 92705.

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3. On or about August 2, 1982, the Board issued Physician's and Surgeon's Certificate No. A 38887 to Respondent. That license was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2021-077677 and will expire on July 31, 2024, unless renewed.

JURISDICTION

4. Accusation No. 800-2021-077677 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on September 18, 2023. Respondent filed a Notice of Consideration for Stipulated Surrender in response to the Accusation. A copy of Accusation No. 800-2021-077677 is attached as Exhibit A and incorporated by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2021-077677. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 800-2021-077677, agrees that cause exists for discipline and hereby surrenders his Physician's and Surgeon's Certificate No. A 38887 for the Board's formal acceptance.

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9. Respondent understands that by signing this stipulation he enables the Board to issue an order accepting the surrender of his Physician's and Surgeon's Certificate without further process.

RESERVATION

10. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Medical Board of California or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

CONTINGENCY

11. Business and Professions Code section 2224, subdivision (b), provides, in pertinent part, that the Medical Board “shall delegate to its executive director the authority to adopt a ... stipulation for surrender of a license.”

12. Respondent understands that, by signing this stipulation, he enables the Executive Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his Physician's and Surgeon's Certificate No. A 38887 without further notice to, or opportunity to be heard by, Respondent.

13. This Stipulated Surrender of License and Disciplinary Order shall be subject to the approval of the Executive Director on behalf of the Board. The parties agree that this Stipulated Surrender of License and Disciplinary Order shall be submitted to the Executive Director for his consideration in the above-entitled matter and, further, that the Executive Director shall have a reasonable period of time in which to consider and act on this Stipulated Surrender of License and Disciplinary Order after receiving it. By signing this stipulation, Respondent fully understands and agrees that he may not withdraw his agreement or seek to rescind this stipulation prior to the time the Executive Director, on behalf of the Medical Board, considers and acts upon it.

14. The parties agree that this Stipulated Surrender of License and Disciplinary Order shall be null and void and not binding upon the parties unless approved and adopted by the Executive Director on behalf of the Board, except for this paragraph, which shall remain in full force and effect. Respondent fully understands and agrees that in deciding whether or not to

1 approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Executive
2 Director and/or the Board may receive oral and written communications from its staff and/or the
3 Attorney General's Office. Communications pursuant to this paragraph shall not disqualify the
4 Executive Director, the Board, any member thereof, and/or any other person from future
5 participation in this or any other matter affecting or involving respondent. In the event that the
6 Executive Director on behalf of the Board does not, in his discretion, approve and adopt this
7 Stipulated Surrender of License and Disciplinary Order, with the exception of this paragraph, it
8 shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied
9 upon or introduced in any disciplinary action by either party hereto. Respondent further agrees
10 that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason
11 by the Executive Director on behalf of the Board, Respondent will assert no claim that the
12 Executive Director, the Board, or any member thereof, was prejudiced by its/his/her review,
13 discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or
14 of any matter or matters related hereto.

15 **ADDITIONAL PROVISIONS**

16 15. This Stipulated Surrender of License and Disciplinary Order is intended by the parties
17 herein to be an integrated writing representing the complete, final and exclusive embodiment of
18 the agreements of the parties in the above-entitled matter.

19 16. The parties agree that copies of this Stipulated Surrender of License and Disciplinary
20 Order, including copies of the signatures of the parties, may be used in lieu of original documents
21 and signatures and, further, that such copies shall have the same force and effect as originals.

22 17. In consideration of the foregoing admissions and stipulations, the parties agree the
23 Executive Director of the Board may, without further notice to or opportunity to be heard by
24 Respondent, issue and enter the following Disciplinary Order on behalf of the Board:

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ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 38887, issued to Respondent CHICKKIAH PADMANABHAN, M.D., is surrendered and accepted by the Board.

1. The surrender of Respondent's Physician's and Surgeon's Certificate and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.

2. Respondent shall lose all rights and privileges as a Physician and Surgeon in California as of the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board his pocket license and, if one was issued, his wall certificate on or before the effective date of the Decision and Order.

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked or surrendered license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 800-2021-077677 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. Respondent shall pay the agency its costs of investigation and enforcement in the amount of \$8,828.75 prior to issuance of a new or reinstated license.

6. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 800-2021-077677 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

7. Respondent shall pay the agency its costs of investigation and enforcement in the amount of \$8,828.75 prior to issuance of a new or reinstated license.

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1 ACCEPTANCE

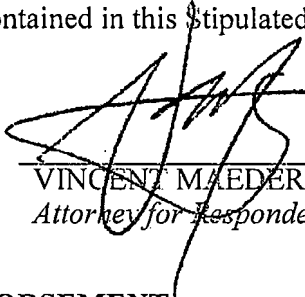
2 I have carefully read the above Stipulated Surrender of License and Order and have fully
3 discussed it with my attorney Vincent Maeder, Esq. I understand the stipulation and the effect it
4 will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of
5 License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the
6 Decision and Order of the Medical Board of California.

7 DATED: 10/11/2023


CHICKKIAH PADMANABHAN, M.D.
Respondent

10 I have read and fully discussed with Respondent CHICKKIAH PADMANABHAN, M.D.
11 the terms and conditions and other matters contained in this Stipulated Surrender of License and
12 Order. I approve its form and content.

13 DATED: 10/11/2023


VINCENT MAEDER, ESQ.
Attorney for Respondent

16 ENDORSEMENT

17 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
18 for consideration by the Medical Board of California of the Department of Consumer Affairs.

19 DATED: _____

Respectfully submitted,

20 ROB BONTA
21 Attorney General of California
22 JUDITH T. ALVARADO
23 Supervising Deputy Attorney General

24 LATRICE R. HEMPHILL
25 Deputy Attorney General
26 Attorneys for Complainant

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1 ACCEPTANCE

2 I have carefully read the above Stipulated Surrender of License and Order and have fully
3 discussed it with my attorney Vincent Maeder, Esq. I understand the stipulation and the effect it
4 will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of
5 License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the
6 Decision and Order of the Medical Board of California.

7 DATED: _____

8 CHICKKIAH PADMANABHAN, M.D.
9 *Respondent*

10 I have read and fully discussed with Respondent CHICKKIAH PADMANABHAN, M.D.
11 the terms and conditions and other matters contained in this Stipulated Surrender of License and
12 Order. I approve its form and content.

13 DATED: _____

14 VINCENT MAEDER, ESQ.
15 *Attorney for Respondent*

16 ENDORSEMENT

17 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
18 for consideration by the Medical Board of California of the Department of Consumer Affairs.

19 DATED: October 11, 2023

Respectfully submitted,

20 ROB BONTA
21 Attorney General of California
22 JUDITH T. ALVARADO
23 Supervising Deputy Attorney General

24 

25 LATRICE R. HEMPHILL
26 Deputy Attorney General
27 *Attorneys for Complainant*

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Exhibit A

Accusation No. 800-2021-077677

1 ROB BONTA
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2 JUDITH T. ALVARADO
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Attorneys for Complainant
7

8 **BEFORE THE**
9 **MEDICAL BOARD OF CALIFORNIA**
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11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 800-2021-077677

13 **CHICKKIAH PADMANABHAN, M.D.**
14 44215 15th Street West, Suite 207
Lancaster, CA 93534

A C C U S A T I O N

15 **Physician's and Surgeon's Certificate**
16 **No. A 38887,**

Respondent.

17
18
19 **PARTIES**

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

23 2. On or about August 2, 1982, the Medical Board issued Physician's and Surgeon's
24 Certificate Number A 38887 to Chickkiah Padmanabhan, M.D. (Respondent). The Physician's
25 and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
26 herein and will expire on July 31, 2024, unless renewed.

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JURISDICTION

3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 2227 of the Code states:

(a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter:

(1) Have his or her license revoked upon order of the board.

(2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.

(3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.

(4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.

(5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.

(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical review or advisory conferences, professional competency examinations, continuing education activities, and cost reimbursement associated therewith that are agreed to with the board and successfully completed by the licensee, or other matters made confidential or privileged by existing law, is deemed public, and shall be made available to the public by the board pursuant to Section 803.1.

5. Section 2234 of the Code, states:

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

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

(b) Gross negligence.

(c) Repeated negligent acts. To be repeated, there must be two or more negligent acts 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.

(1) An initial negligent diagnosis followed by an act or omission medically

appropriate for that negligent diagnosis of the patient shall constitute a single negligent act.

(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, 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 distinct breach of the standard of care.

(d) Incompetence.

(e) The commission of any act involving dishonesty or corruption that is substantially related to the qualifications, functions, or duties of a physician and surgeon.

(f) Any action or conduct that would have warranted the denial of a certificate.

(g) The failure by a certificate holder, in the absence of good cause, to attend and participate in an interview by the board. This subdivision shall only apply to a certificate holder who is the subject of an investigation by the board.

COST RECOVERY

6. Section 125.3 of the Code states:

(a) Except as otherwise provided by law, in any order issued in resolution of a disciplinary proceeding before any board within the department or before the Osteopathic Medical Board, upon request of the entity bringing the proceeding, the administrative law judge may direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

(b) In the case of a disciplined licensee that is a corporation or a partnership, the order may be made against the licensed corporate entity or licensed partnership.

(c) A certified copy of the actual costs, or a good faith estimate of costs where actual costs are not available, signed by the entity bringing the proceeding or its designated representative shall be prima facie evidence of reasonable costs of investigation and prosecution of the case. The costs shall include the amount of investigative and enforcement costs up to the date of the hearing, including, but not limited to, charges imposed by the Attorney General.

(d) The administrative law judge shall make a proposed finding of the amount of reasonable costs of investigation and prosecution of the case when requested pursuant to subdivision (a). The finding of the administrative law judge with regard to costs shall not be reviewable by the board to increase the cost award. The board may reduce or eliminate the cost award, or remand to the administrative law judge if the proposed decision fails to make a finding on costs requested pursuant to subdivision (a).

(e) If an order for recovery of costs is made and timely payment is not made as directed in the board's decision, the board may enforce the order for repayment in any appropriate court. This right of enforcement shall be in addition to any other rights the board may have as to any licensee to pay costs.

(f) In any action for recovery of costs, proof of the board's decision shall be

conclusive proof of the validity of the order of payment and the terms for payment.

(g) (1) Except as provided in paragraph (2), the board shall not renew or reinstate the license of any licensee who has failed to pay all of the costs ordered under this section.

(2) Notwithstanding paragraph (1), the board may, in its discretion, conditionally renew or reinstate for a maximum of one year the license of any licensee who demonstrates financial hardship and who enters into a formal agreement with the board to reimburse the board within that one-year period for the unpaid costs.

(h) All costs recovered under this section shall be considered a reimbursement for costs incurred and shall be deposited in the fund of the board recovering the costs to be available upon appropriation by the Legislature.

(i) Nothing in this section shall preclude a board from including the recovery of the costs of investigation and enforcement of a case in any stipulated settlement.

(j) This section does not apply to any board if a specific statutory provision in that board's licensing act provides for recovery of costs in an administrative disciplinary proceeding.

DEFINITIONS

7. Acidotic is a condition in which there is too much acid in the body fluids. This commonly occurs when the kidneys fail to remove enough acid from your blood or when an individual experiences unmanageable diarrhea.

8. Hypotension (hypotensive) is a decrease in systemic blood pressure below accepted low value. An individual in a hypotensive state can experience dizziness and fainting.

9. A Sigmoidoscopy is a diagnostic test that looks at the rectum and lower part of the large intestine (colon) to diagnose the cause of stomach pain, diarrhea, and constipation, among other things.

10. An exploratory laparotomy is a surgery to open up the abdomen in order to find the cause of problems that testing could not diagnose. This is also used when an abdominal injury needs emergency medical care.

11. An ileostomy is a surgery, which brings a loop of the small intestine to the surface of the skin. This procedure is used to move waste out of the body and is done when the colon or rectum is not working properly.

12. A colectomy is a type of surgery used to treat colon diseases. It is a resection of the large bowel.

FIRST CAUSE FOR DISCIPLINE

(Gross Negligence/Repeated Negligent Acts)

13. Respondent is subject to disciplinary action under section 2234, subdivisions (b) and (c), of the Code in that he was repeatedly and grossly negligent in the care and treatment of Patient A.¹ The circumstances are as follows:

14. Respondent is a surgeon and primary care practitioner, who owns a solo practice in Lancaster, California. In March 2021, Respondent had medical privileges at Antelope Valley Hospital, Antelope Valley Surgical Center, and Palmdale Regional Medical Center.

15. Patient A was a sixty-four (64) year old woman who presented to Antelope Valley Hospital's Emergency Department (ED) on or about March 13, 2021. Patient A complained of abdominal pain, nausea, and vomiting. Dr. P.K., a physician in the ED, completed a consultation with Patient A, documenting her medical history, which included a gastric bypass procedure in 1995, and present symptoms. Dr. P.K. determined that Patient A was acidotic and hypotensive. Patient A was admitted into the Intensive Care Unit (ICU).

16. Patient A was sent for a surgery consult with Respondent. Respondent recommended a gastrointestinal evaluation and a sigmoidoscopy with possible fecal dis-impaction. On or about March 14, 2021, Respondent performed an exploratory laparotomy of the abdomen, along with a colectomy and ileostomy. Following the procedures, Patient A experienced significant postoperative bleeding.

17. On or about March 15, 2021, because of the persistent postoperative bleeding, Respondent performed a secondary exploratory laparotomy surgery on Patient A. During the procedure, Respondent noted that Patient A had hematomas.²

18. Following the procedure, Patient A was putting out significant frank blood from the right drain and required multiple blood transfusions. Another physician on duty, Dr. S.C., discussed Patient A's case with Respondent. Respondent felt that the patient did not require a repeat laparotomy. Respondent reevaluated Patient A in the ICU and stated that the patient does

¹ The patient is identified as "Patient A" in this Accusation to protect her privacy.

² A hematoma is a bruise that forms when an injury causes blood to collect and pool under the skin.

1 not require surgery despite the recurrent blood transfusions and active bleeding from the drain.
2 Respondent felt that the blood loss was expected postoperatively.

3 19. Dr. S.C. requested the assistance of a secondary surgeon and contacted the chief of
4 surgery to discuss Patient A's case. All other physicians, working on Patient A's case, agreed
5 that she needed emergency surgery. Dr. J.B. agreed to perform the surgery and discussed the
6 procedure in detail with Patient A's spouse beforehand.

7 20. On or about March 15, 2021, Dr. J.B. performed a damage control laparotomy on
8 Patient A. During the surgery, Dr. J.B. drained about four to five liters of blood from Patient A's
9 abdominal cavity. Dr. J.B. noted several areas of bleeding, including Patient A's spleen and the
10 left inferior epigastric artery.³ Consequently, Dr. J.B. performed a splenectomy and placed
11 Hemoclips⁴ on the artery to control the bleeding. Dr. J.B. also found that about 10 centimeters of
12 the left ureter⁵ was missing, and the proximal and distal end of the ureter seemed to be
13 coagulated. After an intraoperative consultation with another physician, Dr. J.B. was instructed
14 to Hemoclip the proximal and distal end of the severed left ureter to prevent any leakage of urine.

15 21. Patient A underwent at least two more laparotomies, on or about March 17 and March
16 23, 2021. Patient A developed multiple organ dysfunction and abnormal liver function. Patient
17 A was eventually transferred to another hospital for continued care.

18 22. The standard of care requires a physician to thoroughly search and identify all sources
19 of bleeding when performing a secondary exploratory laparotomy.

20 23. When Respondent performed the secondary laparotomy, he noted the hematomas but
21 did not determine the source of Patient A's bleeding. On the contrary, Respondent indicated that
22 the blood loss was expected. However, when Dr. J.B. performed an additional laparotomy, he
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26 ³ The left inferior epigastric artery is an artery that supplies blood to your abdominal
27 muscles

28 ⁴ Hemoclips are metallic devices that are firmly attached to the tissue around a bleeding
point to seal bleeding vessels.

⁵ Ureter is the duct through which urine passes from the kidney to the bladder.

1 found that Patient A had a iatrogenic laceration⁶ of the spleen with active bleeding, and
2 hypovolemic shock,⁷ which was secondary to the bleeding.

3 24. Respondent failed to identify the bleeding from the spleen and the epigastric artery,
4 which he should have searched for and identified during the secondary laparotomy. This
5 constitutes an extreme departure from the standard of care.

6 25. The standard of care also requires that the ureter be surgically exposed and identified
7 to avoid injury during a surgery. The degree of injury that caused such a large segment avulsion
8 should have been recognized by Respondent during the colectomy and the secondary exploratory
9 laparotomy. However, this was not discovered until the third laparotomy was performed by Dr.
10 J.B.

11 26. Respondent's failure to recognize a significant iatrogenic ureter injury on Patient A
12 constitutes an extreme departure from the standard of care.

13 SECOND CAUSE FOR DISCIPLINE

14 (Unprofessional Conduct)

15 27. Respondent is subject to disciplinary action under section 2234, subdivision (a) of the
16 Code in that he engaged in unprofessional conduct. The circumstances are as follows:

17 28. The allegations in the First Cause for Discipline, in paragraphs 13 through 26, above,
18 are incorporated herein by reference as if fully set forth.

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27 ⁶ A iatrogenic laceration refers to tissue or organ damage that is caused by necessary
medical treatment or the application of medical devices.

28 ⁷ Hypovolemic shock is an emergency condition in which severe blood or other fluid loss
makes the heart unable to pump enough blood to the body.

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 38887, issued to Respondent Chickkiah Padmanabhan, M.D.;

2. Revoking, suspending or denying approval of Respondent Chickkiah Padmanabhan, M.D.'s authority to supervise physician assistants and advanced practice nurses;

3. Ordering Respondent Chickkiah Padmanabhan, M.D., to pay the Board the costs of the investigation and enforcement of this case, and if placed on probation, the costs of probation monitoring; and

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

DATED: SEP 18 2023


REJI VARGHESE
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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