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

In the Matter of the First Amended Accusation Against:	
Anjana Sailesh Sura, M.D.	Case No. 800-2021-074965
Physician's and Surgeon's Certificate No. A 30390	
Respondent.	

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 4, 2024.

IT IS SO ORDERED December 28, 2023.

MEDICAL BOARD OF CALIFORNIA

Reji Varghese
Executive Director

ROB BONTA
Attorney General of California
ROBERT MCKIM BELL
Supervising Deputy Attorney General
VLADIMIR SHALKEVICH
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State Bar No. 173955
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Attorneys for Complainant

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

In the Matter of the Accusation Against: **ANJANA SAILESH SURA, M.D.** 17695 Arrow Blvd. Fontana, CA 92335-4041 Physician's and Surgeon's Certificate No. A 30390 Respondents.	Case No. 800-2021-074965 OAH No. 2023030788 **STIPULATED SURRENDER OF LICENSE AND ORDER**

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

PARTIES

1. Reji Varghese (Complainant) is the Executive Director of the Medical Board of California (Board). He brought this action solely in his official capacity and is represented in this matter by Rob Bonta, Attorney General of the State of California, by Vladimir Shalkevich, Deputy Attorney General.

2. Anjana Sailesh Sura, M.D. (Respondent) is represented in this proceeding by attorney Daniel V. Behesnilian, whose address is 8484 Wilshire Blvd., Suite 700, Beverly Hills, California 90211.

3. On August 24, 1976, the Board issued Physician's and Surgeon's Certificate No. A 30390 to Respondent. That license was in full force and effect at all times relevant to the charges brought in First Amended Accusation No. 800-2021-074965 and will expire on November 30, 2025, unless renewed.

JURISDICTION

4. A First Amended Accusation No. 800-2021-074965 was filed before the Board, and is currently pending against Respondent. The First Amended Accusation and all other statutorily required documents were properly served on Respondent on November 17, 2022. Respondent timely filed her Notice of Defense contesting the First Amended Accusation. A copy of First Amended Accusation No. 800-2021-074965 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 First Amended Accusation No. 800-2021-074965. 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 her legal rights in this matter, including the right to a hearing on the charges and allegations in the First Amended Accusation; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her 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 understands that the charges and allegations in First Amended Accusation No. 800-2021-074965, if proven at a hearing, constitute cause for imposing discipline upon her Physician's and Surgeon's Certificate.

9. For the purpose of resolving the First Amended Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the charges in the First Amended Accusation and that those charges constitute cause for discipline. Respondent hereby gives up her right to contest that cause for discipline exists based on those charges.

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

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 her Physician's and Surgeon's Certificate No. A 30390 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 her 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

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

ADDITIONAL PROVISIONS

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

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

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

ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 30390, issued to Respondent Anjana Sailesh Sura, M.D., is surrendered and accepted by the Board, effective on January 1, 2024.

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 her pocket license and, if one was issued, her 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. 800-2021-074965 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. 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. 800-2021-074965 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.

6. Respondent shall pay the agency a fine of $10,000 for her violation of Business and Professions Code section 2225.5, as well as the agency's costs of investigation and enforcement in this matter, in the amount of $ 27,795.25, a total of $ 37,795.25, prior to issuance of a new or reinstated license.

7. 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 First Amended Accusation No. Medical Board of California 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.

ACCEPTANCE

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

DATED: 10/31/2023

ANJANA SAILESH SURA, M.D.
Respondent

I have read and fully discussed with Respondent ANJANA SAILESH SURA, M.D. the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: 10/31/2023

DANIEL V. BEHESNILIAN.
Attorney for Respondent

ENDORSEMENT

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

DATED: _____

Respectfully submitted,

ROB BONTA
Attorney General of California
ROBERT MCKIM BELL
Supervising Deputy Attorney General

VLADIMIR SHALKEVICH
Deputy Attorney General
Attorneys for Complainant

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ACCEPTANCE

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

DATED: _____

ANJANA SAILESH SURA, M.D.
Respondent

I have read and fully discussed with Respondent ANJANA SAILESH SURA, M.D. the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: _____

DANIEL V. BEHESNILIAN.
Attorney for Respondent

ENDORSEMENT

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

DATED: November 1, 2023

Respectfully submitted,

ROB BONTA
Attorney General of California
ROBERT MCKIM BELL
Supervising Deputy Attorney General

Electronically signed

VLADIMIR SHALKEVICH
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

First Amended Accusation No. 800-2021-074965

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

In the Matter of the First Amended Accusation Against: **ANJANA SAILESH SURA, M.D.** 17695 Arrow Blvd. Fontana, CA 92335-4041 Physician's and Surgeon's Certificate No. A 30390, Respondent.	Case No. 800-2021-074965 **FIRST AMENDED ACCUSATION**

PARTIES

1. William Prasifka (Complainant) brings this First Amended Accusation solely in his official capacity as the Executive Director of the Medical Board of California (Board).

2. On August 24, 1976, the Board issued Physician's and Surgeon's Certificate Number A 30390 to Anjana Sailesh Sura, M.D. (Respondent). That license was in full force and effect at all times relevant to the charges brought herein and will expire on November 30, 2023, unless renewed.

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JURISDICTION

3. This First Amended 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 2225.5 of the Code states:

> (a) (1) A licensee who fails or refuses to comply with a request for the certified medical records of a patient, that is accompanied by that patient's written authorization for release of records to the board, within 15 days of receiving the request and authorization, shall pay to the board a civil penalty of one thousand dollars ($1,000) per day for each day that the documents have not been produced after the 15th day, up to ten thousand dollars ($10,000), unless the licensee is unable to provide the documents within this time period for good cause.

6. 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.

7. Section 2052 of the Code states:

(a) Notwithstanding Section 146, any person who practices or attempts to practice, or who advertises or holds himself or herself out as practicing, any system or mode of treating the sick or afflicted in this state, or who diagnoses, treats, operates for, or prescribes for any ailment, blemish, deformity, disease, disfigurement, disorder, injury, or other physical or mental condition of any person, without having at the time of so doing a valid, unrevoked, or unsuspended certificate as provided in this chapter [Chapter 5, the Medical Practice Act], or without being authorized to perform the act pursuant to a certificate obtained in accordance with some other provision of law, is guilty of a public offense, punishable by a fine not exceeding ten thousand dollars ($10,000), by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code, by imprisonment in a county jail not exceeding one year, or by both the fine and either imprisonment.

(b) Any person who conspires with or aids or abets another to commit any act described in subdivision (a) is guilty of a public offense, subject to the punishment described in that subdivision.

(c) The remedy provided in this section shall not preclude any other remedy provided by law.

8. Section 2064 of the Code states:

The employing, directly or indirectly, the aiding, or the abetting of any unlicensed person or any suspended, revoked, or unlicensed practitioner to engage in the practice of medicine or any other mode of treating the sick or afflicted which requires a license to practice constitutes unprofessional conduct.

9. 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.

FACTUAL ALLEGATIONS

Patient 1

10. On or about July 1, 2019, the Board received a complaint from Patient 1, a woman who had responded to an advertisement in a Spanish-language publication. According to the complaint, Patient 1 went to Ecologica Organic Spa (hereafter, Ecologica) in October 2018, where she spoke to an individual named "Fatima" about a "butt augmentation" treatment offered by Ecologica. The person to whom Patient 1 spoke was Fatima Ranjbar (hereafter, Ranjbar), an individual who holds no healthcare license in the State of California. Ranjbar offered Patient 1 a "non-invasive" treatment whereby blood drawn from the patient would be spun and then injected to the patient's buttock area. The cost of the treatment was to be $1,600. The patient agreed. She was photographed and underwent the procedure that lasted eight or nine hours. The patient was sent home alone in an Uber car.

11. Following the procedure, the patient suffered some pain and approximately two weeks after the procedure called Ecologica to speak to the individual who treated her. She was told by Ecologica staff that they did not know who treated her. The patient then physically went to the Ecologica location. Once again, the staff at Ecologica told her they did not know who performed the procedure on her. The patient asked to speak to Ranjbar, but Ranjbar was not available. The patient was given a massage, but ended up going home with no information.

12. After speaking with Board investigators, and providing them with a signed authorization for her medical records from Ecologica, the Patient returned to Ecologica on or about August 27, 2019, to request her records. She was introduced to Respondent. Respondent was apologetic and agreed to release her medical records to Patient 1. Respondent referred the patient to Ranjbar. The Patient then spoke to Ranjbar and asked for her medical records. Ranjbar

told the patient that she could not find her records and to return in six days. Ranjbar refunded the money the patient previously paid and offered Patient 1 a free facial, which the patient declined. The records were not provided to the patient, six days after the visit or at any time.

13. On December 17, 2019, Board investigator sent, via certified mail return receipt requested, a formal request for Patient 1's certified medical records from Respondent. The request was accompanied by Patient 1's signed authorization. The request was received and a return receipt was returned to the Board investigator by the U.S. Post Office. The requested records were not produced within 15 days.

14. The Board investigators next issued a subpoena for the records, which was delivered to Respondent's attorney, after he agreed to accept it, on September 14, 2020. On September 16, 2020, Respondent's attorney provided Patient 1's uncertified medical records to the Board's investigators.

15. The medical records provided by Respondent on September 16, 2020, contain the original request for her records, dated August 27, 2019, as well as a receipt for the refund issued to the patient on that date. The receipt is signed by the patient and by Ranjbar. The medical records also contain a comprehensive client consultation form in Spanish, dated October 23, 2018. It contains the patient's address and minimal history, indicating the use of a body scrub, that the patient smokes, does not drink alcohol, consumes eight bottles of water per day and sleeps eight hours per night. Most of the "client consultation" form is blank and the form is not signed. On the same date, there is a price quotation sheet for one session of "Latin Butt Lift" for $1,600. It also indicates, in Spanish, that three sessions are recommended and the duration of the result is questionable due to the patient's smoking. This price quotation is also unsigned and indicates that the payment was collected as follows: $1,000 on October 23, 2018 and $600 on October 24, 2018. Both payments were made in cash. The patient's driver's license was also copied. Patient 1's records also contain an Initial Consultation Consent form in English that is signed by the patient and dated October 23, 2018. This document is also signed by Ranjbar and Respondent. The Patient's treatment sheet shows that a "Latin Butt" was performed on October 23, 2018, and "Electros Gluteos" on October 30, 2018. There is also a body diagram with

buttocks circled and other illegible entries that purports to be a record of the procedure. This document is unsigned. Patient 1's medical record contains a Pre-Procedure History and Physical, which is dated August 27, 2019, more than ten months after the patient's procedure, that is signed by Respondent. The medical record does not contain a procedure note for the cosmetic procedure performed on Patient 1, or the photographs of the patient that were taken on the day of her procedure.

16. Respondent was interviewed by the Board's investigators on or about October 22, 2020. During this interview, Respondent reviewed the medical records provided by her attorney in response to the subpoena, and signed a certification for the medical records. Respondent explained that she is a pediatrician and owns a medical practice called Delta Medical Center, doing business as Ecologica Medical Spa. Respondent also explained that Ranjbar owned Ecological Organic Spa, a non-medical aesthetic business at the same physical location as Respondent's clinic. The signage at the location indicates that the business is Ecological Medical Spa.

17. During the interview, Respondent stated that Ranjbar was not supposed to be performing patient consultations, but that Ranjbar had access to Respondent's patient charts "if it was a skin treatment." Respondent stated that she does not have the keys to the room where the medical records are kept. When asked if Ranjbar ever performed teachings or consultations to Respondent's patients, Respondent stated: "I don't know what she was doing for my patients." When asked why Ranjbar signed Patient 1's Initial Consultation Consent form on October 23, 2018, which Respondent co-signed as well, Respondent stated: "As I said, what she was doing on my patients, I don't know. And I hadn't given her the authority to do anything." Respondent stated that Ranjbar signed the Initial Consultation Consent Form because she acted as an interpreter, but when asked whether she saw the patient that day, Respondent stated that she did not remember. When asked who provided the treatment to Patient 1, Respondent replied that she did not know.

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Patient 2

18. On August 26, 2020, the Board received a complaint from Patient 2, who went to Ecologica on August 1, 2020 for a PDO[1] facelift with threads. According to her complaint, she was seen by a "Dr. Alfredo" whose last name she did not know, had a Zoom consult with a female doctor whose name she did not know, and was seen also by "Fatima" (Ranjbar) who quoted her fees for packages that included cosmetic surgical procedures, ranging from $4,000 - $6,000. Patient 2 told Ranjbar she did not have time for multiple treatments and was quoted $1,900 for a thread lift treatment. After the patient paid, "Dr. Alfredo" used numbing medication and placed threads in her face and then told her she would have to come back to complete the treatment in two weeks. Patient 2 then had trouble making a return appointment, but eventually she returned to the office location and asked to speak to "Dr. Alfredo." Her request was refused.

19. Patient 2 asked for her medical records, the doctor's last name and license, and was refused. She was given a refund of $800. According to a typed note, dated August 20, 2020, that was signed by Patient 2, the refund was given because Patient 2 "did not inform in the original consultation of some medication that she's currently taking, and it could interfere with the result expected." This explanation for the patient's refund was false.

20. Patient 2 went to a different facility and saw a nurse, who called for the records from Ecologica, and was told they could not FAX the record and it would be 30 days before records could be provided.

21. When the Board began its investigation, and obtained Patient 2's certified medical records from Ecologica, there was a note written on "Delta Medical Group" letterhead pertaining to the treatment dated August 1, 2002, describing Viola threads that were placed in Patient 2' s nasolabial folds. There are additional medical records on the letterhead of "Delta Medical Group, Anjana Sura, M.D." detailing the thread lift treatment recommended and signed by Alfredo Rodriguez, R.N. and Theresa Cooley, N.P.

[1] PDO thread lift is a cosmetic medical procedure. The "threads" are absorbable sutures made of polydioxanone (PDO) which contain small hooks. The hooks are imbedded under the patient's skin through a cannula and are secured inside of the patient's skin to "lift" facial features.

22. During her interview with the Board's investigators, Respondent explained that Ranjbar is not a licensed physician, and had no authority to quote fees for procedures and packages, that Ranjbar was a public relations person who speaks Spanish and worked as such in Respondent's clinic, but that Respondent did not pay Ranjbar to work there. During the same interview Respondent also stated that Ranjbar hired her to act as a "medical director" of the Ecologica Medical Spa.

Ranjbar Conviction

23. On or about August 25, 2021, in a Superior Court case number BA476906[2], entitled *People of the State of California vs. Fatima Ranjbar*, upon a plea of nolo contendere, Ranjbar was convicted of a violation of Business and Professions Code 2052, subdivision (a), unlicensed medical practice, a felony. This conviction was based on investigation of Ranjbar's activities at Ecologica, located at 1200A W. Beverly Boulevard, Montebello, CA 90640, the same location where Patients 1 and 2 received medical care described herein.

FIRST CAUSE FOR DISCIPLINE

(Aiding or Abetting Unlicensed Practice of Medicine)

24. Respondent Anjana Sailesh Sura, M.D. is subject to disciplinary action under section 2234, 2252 and 2264 of the Code in that she aided or abetted unlicensed practice of medicine. The circumstances are as follows:

25. The allegations of paragraphs 10 through 23 are incorporated here by reference.

SECOND CAUSE FOR DISCIPLINE

(Gross Negligence)

26. Respondent Anjana Sailesh Sura, M.D. is subject to disciplinary action under section 2234, subdivision (b) of the Code in that she was grossly negligent in the care and treatment of two patients. The circumstances are as follows:

27. The allegations of paragraphs 10 through 23 are incorporated here by reference.

28. Aiding or abetting unlicensed practice was an extreme departure from the standard of care.

[2] Medical Board of California Investigation Number 800-2016-019936

THIRD CAUSE FOR DISCIPLINE

(Repeated Negligent Acts)

29. Respondent Anjana Sailesh Sura, M.D. is subject to disciplinary action under section 2234, subdivision (c) of the Code, in that she committed repeated negligent acts in the care and treatment of two patients. The circumstances are as follows:

30. The allegations of paragraphs 10 through 23 are incorporated here by reference.

31. Each of the following was a departure from the standard of care:

a.) The manner in which Respondent maintained Patient 1's medical records was a departure from the standard of care.

b.) Respondent's failure to timely provide Patient 1's certified medical records to the Board was a departure from the standard of care.

c.) Respondent's aiding and abetting unlicensed practice of medicine in providing care and treatment of Patient 1 was a departure from the standard of care.

d.) Respondent's supervision of performance of medical procedure on Patient 1, which she does not do herself was a departure from the standard of care.

e.) Respondent's employment as a Medical Director at an entity owned by a lay person was a departure from the standard of care.

f.) Respondent's aiding or abetting unlicensed practice of medicine in providing care and treatment to Patient 2 was a departure from the standard of care.

FOURTH CAUSE FOR DISCIPLINE

(Failure to Provide Medical Records)

32. Respondent Anjana Sailesh Sura, M.D. is subject to disciplinary action under section 2225.5 of the Code in that she failed to provide Patient 1's certified medical records to the Board despite receiving a request accompanied by the patient's authorization. The circumstances are as follows:

33. The allegations of paragraphs 10 through 17 are incorporated here by reference.

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FOURTH CAUSE FOR DISCIPLINE

(Inadequate and Inaccurate Record Keeping)

34. Respondent Anjana Sailesh Sura, M.D. is subject to disciplinary action under section 2266 of the Code, in that she failed to maintain complete and accurate records of the care and treatment rendered to Patients 1 and 2. The circumstances are as follows:

35. The allegations of paragraphs 10 through 23 are incorporated here by reference.

DISCIPLINARY CONSIDERATIONS

36. To determine the degree of discipline, if any, to be imposed on Respondent Anjana Sailesh Sura, M.D., Complainant alleges that on or about August 20, 2008, in a prior disciplinary action titled *In the Matter of the Accusation Against Anjana Sailesh Sura, M.D.* before the Medical Board of California, in Case Number 11-2004-162151, Respondent's license was revoked, but the revocation was stayed and she was placed on probation for a period of 35 months, with various terms and conditions. In resolving that matter, Respondent admitted committing repeated negligent acts and failure to maintain adequate and accurate medical records in the care and treatment of five patients. That decision is now final and is incorporated by reference as if fully set forth herein.

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 30390, issued to Anjana Sailesh Sura, M.D.;

2. Revoking, suspending or denying approval of her authority to supervise physician assistants and advanced practice nurses;

3. Ordering her to pay the Board a civil penalty in the amount of $10,000 for failure to timely provide to the Board complete certified medical records upon request accompanied by a patient's authorization.

4. Ordering her 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

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

DATED: NOV 17 2022

WILLIAM PRASIFKA
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California

Complainant

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