

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

**In the Matter of the Accusation
Against:**

Marsha Funderburk Granese, M.D.

**Physician's and Surgeon's
Certificate No. A 83534**

Respondent.

Case No.: 800-2022-085066

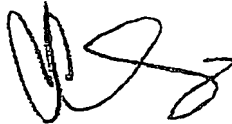
DECISION

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 May 23, 2024.

IT IS SO ORDERED: April 23, 2024.

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 ROBERT W. LINCOLN
Deputy Attorney General
4 State Bar No. 316290
California Department of Justice
5 600 West Broadway, Suite 1800
San Diego, CA 92101
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8 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:
14 **MARSHA FUNDERBURK GRANESE,**
M.D.
15 **26800 Crown Valley Pkwy, Ste 545**
Mission Viejo, CA 92691-6384
16
17 **Physician's and Surgeon's Certificate No.**
A 83534
18
19 Respondent.

Case No. 800-2022-085066

OAH No. 2023070895

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

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

22 **PARTIES**

23 1. Reji Varghese (Complainant) is the Executive Director of the Medical Board of
24 California (Board). He brought this action solely in his official capacity and is represented in this
25 matter by Rob Bonta, Attorney General of the State of California, by Robert W. Lincoln, Deputy
26 Attorney General.

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1 CULPABILITY

2 9. Respondent does not contest that, at an administrative hearing, Complainant could
3 establish a *prima facie* case with respect to the charges and allegations in Accusation No. 800-
4 2022-085066, and that he has thereby subjected her Physician's and Surgeon's Certificate No. A
5 83534 to disciplinary action.

6 10. Respondent agrees that her Physician's and Surgeon's Certificate is subject to
7 discipline and she agrees to be bound by the Board's probationary terms as set forth in the
8 Disciplinary Order below.

9 CONTINGENCY

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

20 12. Respondent agrees that if she ever petitions for early termination or modification of
21 probation, or if an accusation and/or petition to revoke probation is filed against her before the
22 Board, all of the charges and allegations contained in Accusation No. 800-2022-085066 shall be
23 deemed true, correct and fully admitted by respondent for purposes of any such proceeding or any
24 other licensing proceeding involving Respondent in the State of California.

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

1 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board
2 or its designee, be accepted towards the fulfillment of this condition if the course would have
3 been approved by the Board or its designee had the course been taken after the effective date of
4 this Decision.

5 Respondent shall submit a certification of successful completion to the Board or its
6 designee not later than 15 calendar days after successfully completing the course, or not later than
7 15 calendar days after the effective date of the Decision, whichever is later.

8 3. CLINICAL COMPETENCE ASSESSMENT PROGRAM. Within 60 calendar days
9 of the effective date of this Decision, Respondent shall enroll in a clinical competence assessment
10 program approved in advance by the Board or its designee. Respondent shall successfully
11 complete the program not later than six (6) months after Respondent's initial enrollment unless
12 the Board or its designee agrees in writing to an extension of that time.

13 The program shall consist of a comprehensive assessment of Respondent's physical and
14 mental health and the six general domains of clinical competence as defined by the Accreditation
15 Council on Graduate Medical Education and American Board of Medical Specialties pertaining to
16 Respondent's current or intended area of practice. The program shall take into account data
17 obtained from the pre-assessment, self-report forms and interview, and the Decision(s),
18 Accusation(s), and any other information that the Board or its designee deems relevant. The
19 program shall require Respondent's on-site participation as determined by the program for the
20 assessment and clinical education and evaluation. Respondent shall pay all expenses associated
21 with the clinical competence assessment program.

22 At the end of the evaluation, the program will submit a report to the Board or its designee
23 which unequivocally states whether the Respondent has demonstrated the ability to practice
24 safely and independently. Based on Respondent's performance on the clinical competence
25 assessment, the program will advise the Board or its designee of its recommendation(s) for the
26 scope and length of any additional educational or clinical training, evaluation or treatment for any
27 medical condition or psychological condition, or anything else affecting Respondent's practice of
28 medicine. Respondent shall comply with the program's recommendations.

1 Determination as to whether Respondent successfully completed the clinical competence
2 assessment program is solely within the program's jurisdiction.

3 If Respondent fails to enroll, participate in, or successfully complete the clinical
4 competence assessment program within the designated time period, Respondent shall receive a
5 notification from the Board or its designee to cease the practice of medicine within three (3)
6 calendar days after being so notified. The Respondent shall not resume the practice of medicine
7 until enrollment or participation in the outstanding portions of the clinical competence assessment
8 program have been completed. If the Respondent did not successfully complete the clinical
9 competence assessment program, the Respondent shall not resume the practice of medicine until a
10 final decision has been rendered on the accusation and/or a petition to revoke probation. The
11 cessation of practice shall not apply to the reduction of the probationary time period.

12 Within 60 days after Respondent has successfully completed the clinical competence
13 assessment program, Respondent shall participate in a professional enhancement program
14 approved in advance by the Board or its designee, which shall include quarterly chart review,
15 semi-annual practice assessment, and semi-annual review of professional growth and education.
16 Respondent shall participate in the professional enhancement program at Respondent's expense
17 during the term of probation, or until the Board or its designee determines that further
18 participation is no longer necessary.

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

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

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1 5. SUPERVISION OF PHYSICIAN ASSISTANTS AND ADVANCED PRACTICE
2 NURSES. During probation, Respondent is not prohibited from supervising physician assistants
3 and advanced practice nurses.

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

7 7. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby
8 ordered to reimburse the Board its costs of investigation and enforcement, including, but not
9 limited to, expert review, amended accusations, legal reviews, investigation(s), and subpoena
10 enforcement, as applicable, in the amount of \$25,241.50 (twenty-five thousand two hundred
11 forty-one dollars and fifty cents). Costs shall be payable to the Medical Board of California.
12 Failure to pay such costs shall be considered a violation of probation.

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

17 The filing of bankruptcy by respondent shall not relieve respondent of the responsibility to
18 repay investigation and enforcement costs, including expert review costs (if applicable).

19 8. QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations
20 under penalty of perjury on forms provided by the Board, stating whether there has been
21 compliance with all the conditions of probation.

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

24 9. GENERAL PROBATION REQUIREMENTS.

25 Compliance with Probation Unit

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

27 Address Changes

28 Respondent shall, at all times, keep the Board informed of Respondent's business and

1 residence addresses, email address (if available), and telephone number. Changes of such
2 addresses shall be immediately communicated in writing to the Board or its designee. Under no
3 circumstances shall a post office box serve as an address of record, except as allowed by Business
4 and Professions Code section 2021, subdivision (b).

5 Place of Practice

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

9 License Renewal

10 Respondent shall maintain a current and renewed California physician's and surgeon's
11 license.

12 Travel or Residence Outside California

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

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

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

22 11. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or
23 its designee in writing within 15 calendar days of any periods of non-practice lasting more than
24 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is
25 defined as any period of time Respondent is not practicing medicine as defined in Business and
26 Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month in direct
27 patient care, clinical activity or teaching, or other activity as approved by the Board. If
28 Respondent resides in California and is considered to be in non-practice, Respondent shall

1 comply with all terms and conditions of probation. All time spent in an intensive training
2 program which has been approved by the Board or its designee shall not be considered non-
3 practice and does not relieve Respondent from complying with all the terms and conditions of
4 probation. Practicing medicine in another state of the United States or Federal jurisdiction while
5 on probation with the medical licensing authority of that state or jurisdiction shall not be
6 considered non-practice. A Board-ordered suspension of practice shall not be considered as a
7 period of non-practice.

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

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

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

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

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

26 13. VIOLATION OF PROBATION. Failure to fully comply with any term or condition
27 of probation is a violation of probation. If Respondent violates probation in any respect, the
28 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and

1 carry out the disciplinary order that was stayed. If an Accusation, or Petition to Revoke Probation,
2 or an Interim Suspension Order is filed against Respondent during probation, the Board shall have
3 continuing jurisdiction until the matter is final, and the period of probation shall be extended until
4 the matter is final.

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

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

20 16. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for
21 a new license or certification, or petition for reinstatement of a license, by any other health care
22 licensing action agency in the State of California, all of the charges and allegations contained in
23 Accusation No. 800-2022-085066 shall be deemed to be true, correct, and admitted by
24 Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or
25 restrict license.

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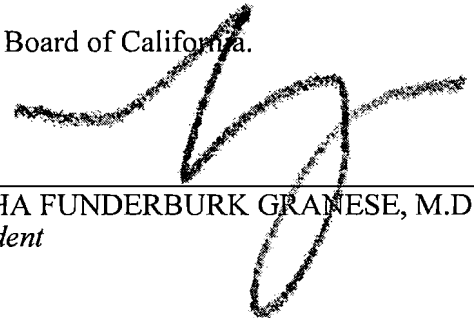
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1 ACCEPTANCE

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

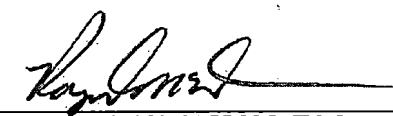
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8 DATED: 3/15/24



9 MARSHA FUNDERBURK GRANESE, M.D.
10 *Respondent*

11 I have read and fully discussed with Respondent Marsha Funderburk Graneese, M.D., the
12 terms and conditions and other matters contained in the above Stipulated Settlement and
13 Disciplinary Order. I approve its form and content.

14
15 DATED: March 15, 2024



16 RAYMOND J. MCMAHON, ESQ.
17 *Attorney for Respondent*

18 ENDORSEMENT

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

21 DATED: 3/15/2023

22 Respectfully submitted,

23 ROB BONTA
24 Attorney General of California
25 ALEXANDRA M. ALVAREZ
26 Supervising Deputy Attorney General

27 /s. Robert W. Lincoln
28 ROBERT W. LINCOLN
29 Deputy Attorney General
30 *Attorneys for Complainant*

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Exhibit A

Accusation No. 800-2022-085066

1 ROB BONTA
Attorney General of California
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3 ROBERT W. LINCOLN
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8 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:

Case No. 800-2022-085066

14 **Marsha Funderburk Granese, M.D.**
26800 Crown Valley Pkwy, Ste 545
15 Mission Viejo, CA 92691

A C C U S A T I O N

16 **Physician's and Surgeon's Certificate**
No. A 83534,
17

Respondent.
18

19
20 **PARTIES**

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

24 2. On or about June 11, 2003, the Medical Board issued Physician's and Surgeon's
25 Certificate No. A 83534 to Marsha Funderburk Granese, M.D. (Respondent). The Physician's
26 and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
27 herein and will expire on August 31, 2024, unless renewed.

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1 JURISDICTION

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

5 4. Section 2227 of the Code states:

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

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

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

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

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

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

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

27 STATUTORY PROVISIONS

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

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

9 ...

10 6. Section 2266 of the Code states: The failure of a physician and surgeon to maintain
11 adequate and accurate records relating to the provision of services to their patients constitutes
12 unprofessional conduct.

13 COST RECOVERY

14 7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
15 administrative law judge to direct a licensee found to have committed a violation or violations of
16 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
17 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
18 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
19 included in a stipulated settlement.

20 FIRST CAUSE FOR DISCIPLINE

21 (Gross Negligence)

22 8. Respondent has subjected her Physician's and Surgeon's Certificate No. A 83534 to
23 disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (b), of
24 the Code, in that she was grossly negligent in her care and treatment of Patient A,¹ as more
25 particularly alleged hereafter:

26 9. On or about October 23, 2019, Patient A first presented to respondent related to pain
27 with intercourse. Respondent diagnosed a hymenal remnant as the cause and recommended
28 conservative management techniques prior to considering a surgical approach.

¹ To protect the privacy of the patient involved, the patient's name has been withheld in
this pleading. Respondent is aware of the identity of the patient referred herein.

1 10. On or about July 13, 2020, Patient A returned to Respondent with continued
2 complaints of pain. Respondent scheduled Patient A for a hymenectomy² on August 13, 2020.

3 11. On or about August 13, 2020, Patient A presented to Respondent for a scheduled
4 hymenectomy. Instead, Respondent performed a bilateral labiaplasty/simple vulvectomy.³ Soon
5 after the surgery, Patient A learned that the more invasive surgery was performed. Patient A
6 sought a second opinion from J.K., M.D. (Dr. J.K.).⁴ Dr. J.K. confirmed a bilateral
7 labiaplasty/simple vulvectomy was performed on Patient A.

8 12. There is no documentation in Respondent's records for the August 13, 2020, surgery
9 date that includes a signed informed consent for the surgery on Patient A, and there is no
10 adequate complaint history in Patient A's records. Additionally, there is no documentation of
11 Respondent using universal protocol procedures before performing the surgery and performing
12 the incorrect surgery on Patient A. Finally, there are no records for Patient A's surgery detailing
13 the amount or concentration of topical anesthetic administered during the surgical procedure.

14 13. Respondent was negligent in her treatment of Patient A because she failed to verify
15 the correct procedure for the correct patient at the correct site. Additionally, Respondent was
16 negligent in her treatment of Patient A because she violated the standard of care by failing to
17 provide informed consent materials and signed forms, have a current history and physical of
18 Patient A, and maintain a medication administration log during the procedure.

19 14. On or about August 18, 2020, Patient A confronted Respondent and informed her
20 during a post-operative appointment that she performed an incorrect procedure. Respondent
21 acknowledged she performed the incorrect procedure and apologized.

22 15. Respondent committed gross negligence in the care and treatment of Patient A by
23 performing the incorrect surgical procedure on Patient A.

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25 _____
26 ² Hymenectomy is a procedure that is done to remove extra tissue from the hymen that
partly or totally covers a female's vagina.

27 ³ Vulvectomy is a gynecological procedure in which the vulva is partly or completely
removed. The procedure is usually performed as a last resort in certain cases of cancer, vulva
28 dysplasia, or as part of female genital mutilation.

⁴ The name of the health care provider is withheld for privacy reasons.

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SECOND CAUSE FOR DISCIPLINE

(Repeated Negligent Acts)

16. Respondent has further subjected her Physician's and Surgeon's Certificate No. A 83534 to disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (c), of the Code, in that she committed repeated negligent acts in her care and treatment of Patient A, as more particularly alleged in paragraphs 8 through 15, above, which are hereby incorporated by reference and realleged as if fully set forth herein, and for the following:

- A. Failing to verify the correct procedure for the correct patient at the correct site;
- B. Failing to provide informed consent materials and signed forms;
- C. Failing to have a current history and physical of Patient A; and
- D. Failing to maintain a medication administration log during the procedure.

THIRD CAUSE FOR DISCIPLINE

(Failure to Maintain Adequate and Accurate Medical Records)

17. Respondent has further subjected her Physician's and Surgeon's Certificate No. A 83534 to disciplinary action under section 2227 and 2234 as defined by section 2266, of the Code, in that Respondent failed to maintain adequate and accurate records regarding her care and treatment of Patient A, as more particularly alleged in paragraphs 8 through 16, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

FOURTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

18. Respondent has further subjected her Physician's and Surgeon's Certificate No. A 83534 to disciplinary action under sections 2227 and 2234 of the Code, in that she has engaged in conduct which breaches the rules or ethical code of the medical profession, or conduct which is unbecoming a member in good standing of the medical profession, and which demonstrates an unfitness to practice medicine, as more particularly alleged in paragraphs 8 through 17, above, which are hereby incorporated by references and realleged as if fully set forth herein.

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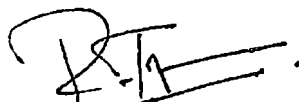
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PRAYER

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 No. A 83534, issued to Marsha Funderburk Granese, M.D.;
2. Revoking, suspending or denying approval of Marsha Funderburk Granese, M.D.'s authority to supervise physician assistants and advanced practice nurses;
3. Ordering Marsha Funderburk Granese, 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: JUL 07 2023



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

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