

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

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

Jennifer Lynne Caris, M.D.

**Physician's and Surgeon's
Certificate No. C 55549**

Respondent.

Case No. 800-2022-093304

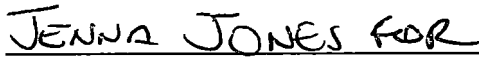
DECISION

**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 August 13, 2024.

IT IS SO ORDERED August 6, 2024.

MEDICAL BOARD OF CALIFORNIA


**Reji Varghese
Executive Director**

1 ROB BONTA
Attorney General of California
2 GREG W. CHAMBERS
Supervising Deputy Attorney General
3 HARRIET NEWMAN
Deputy Attorney General
4 State Bar No. 189784
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (628) 230-7205
6 Facsimile: (415) 703-5480
Attorneys for Complainant
7

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

11 In the Matter of the First Amended Accusation
12 Against:

Case No. 800-2022-093304

13 **JENNIFER LYNNE CARIS, M.D.**
14 **61 VERDOSO AVE.**
LA SELVA BEACH, CA 95076-1750

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

15 **Physician's and Surgeon's Certificate No. C**
16 **55549**

Respondent

17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled
19 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 Harriet Newman, Deputy
24 Attorney General.

25 2. JENNIFER LYNNE CARIS, M.D. (Respondent) is represented in this proceeding by
26 attorney Nicole Valentine, whose address is: 2366 Gold Meadow Way, Suite 200,
27 Gold River, CA 95670-4471.
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3. On or about October 10, 2012, the Board issued Physician's and Surgeon's Certificate No. C 55549 to Respondent. That license was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2022-093304 and will expire on September 30, 2024, unless renewed.

JURISDICTION

4. Accusation No. 800-2022-093304 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 February 29, 2024. Respondent timely filed her Notice of Defense contesting the Accusation. First Amended Accusation 800-2022-093304 was properly served on Respondent on July 23, 2024. A copy of First Amended Accusation No. 800-2022-093304 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. 800-2022-093304. 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.

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1 **CULPABILITY**

2 8. Respondent understands that the charges and allegation in First Amended Accusation
3 No. 800-2022-093304, if proven at hearing, constitute cause for imposing discipline upon her
4 Physician's and Surgeon's Certificate.

5 9. For the purpose of resolving the First Amended Accusation without the expense and
6 uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could
7 establish a factual basis for the charges in the First Amended Accusation and that those charges
8 constitute cause for discipline. Respondent believes she could present evidence disputing the
9 factual basis for the charges in the First Amended Accusation, but she hereby gives up her right to
10 contest that cause for discipline exists based on those charges as she has retired from the practice
11 of medicine.

12 10. Respondent understands that by signing this stipulation she enables the Board to issue
13 an order accepting the surrender of her Physician's and Surgeon's Certificate, No. C 55549,
14 without further process.

15 **CONTINGENCY**

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

19 12. Respondent understands that, by signing this stipulation, she enables the Executive
20 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of her
21 Physician's and Surgeon's Certificate No. C 55549 without further notice to, or opportunity to be
22 heard by, Respondent.

23 13. This Stipulation Surrender of License and Disciplinary Order shall be subject to
24 approval by the Executive Director on behalf of the Board. The parties agree that this Stipulated
25 Surrender of License and Disciplinary Order shall be submitted to the Executive Director for his
26 consideration in the above-entitled matter and, further, that the Executive Director shall have a
27 reasonable period of time in which to consider and act on this Stipulated Surrender of License and
28 Disciplinary Order after receiving it. By signing this stipulation, Respondent fully understands

1 and agrees that she may not withdraw her agreement or seek to rescind this stipulation prior to the
2 time the Executive Director, on behalf of the Medical Board, considers and acts upon it.

3 14. The parties agree that this Stipulated Surrender of License and Disciplinary Order
4 shall be null and void and not binding upon the parties unless approved and adopted by the
5 Executive Director on behalf of the Board, except for this paragraph, which shall remain in full
6 force and effect. Respondent fully understands and agrees that in deciding whether or not to
7 approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Executive
8 Director and/or the Board may receive oral and written communications from its staff and/or the
9 Attorney General's Office. Communications pursuant to this paragraph shall not disqualify the
10 Executive Director, the Board, any member thereof, and/or any other person from future
11 participation in this or any other matter affecting or involving respondent. In the event that the
12 Executive Director on behalf of the Board does not, in his discretion, approve and adopt this
13 Stipulated Surrender of License and Disciplinary Order, with the exception of this paragraph, it
14 shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied
15 upon or introduced in any disciplinary action by either party hereto. Respondent further agrees
16 that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason
17 by the Executive Director on behalf of the Board, Respondent will assert no claim that the
18 Executive Director, the Board, or any member thereof, was prejudiced by its/his/her review,
19 discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or
20 of any matter or matters related hereto.

21 **ADDITIONAL PROVISIONS**

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

25 16. The parties agree that copies of this Stipulated Surrender of License and Disciplinary
26 Order, including copies of the signatures of the parties, may be used in lieu of original documents
27 and signatures and, further, that such copies shall have the same force and effect as originals.
28

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:

ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. C 55549, issued to Respondent JENNIFER LYNNE CARIS, M.D., is surrendered and accepted by the Board.

1. The surrender of Respondent's Physician 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 First Amended Accusation No. 800-2022-093304 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 \$9,333.75 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 First Amended Accusation No. 800-2022-093304 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.

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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 Nicole Valentine. I understand the stipulation and the effect it will
4 have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of License
5 and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and
6 Order of the Medical Board of California.

7
8 DATED: Jul 25, 2024

JL
jen caris (Jul 25, 2024 17:08 PDT)

JENNIFER LYNNE CARIS, M.D.
Respondent

9
10 I have read and fully discussed with Respondent JENNIFER LYNNE CARIS, M.D. the
11 terms and conditions and other matters contained in this Stipulated Surrender of License and
12 Order. I approve its form and content.

13 DATED: July 23, 2024

Nicole Valentine
NICOLE VALENTINE
Attorney for Respondent

14
15
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: July 29, 2024

Respectfully submitted,

20 ROB BONTA
Attorney General of California
21 GREG W. CHAMBERS
Supervising Deputy Attorney General
22 Harriet Newman

23
24 HARRIET NEWMAN
Deputy Attorney General
25 *Attorneys for Complainant*
26
27
28

Exhibit A

First Amended Accusation No. 800-2022-093304

1 ROB BONTA
Attorney General of California
2 GREG W. CHAMBERS
Supervising Deputy Attorney General
3 HARRIET NEWMAN
Deputy Attorney General
4 State Bar No. 189784
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (628) 230-7205
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8 **BEFORE THE**
9 **MEDICAL BOARD OF CALIFORNIA**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 Case No. 800-2022-093304

13 In the Matter of the First Amended Accusation
14 Against:

FIRST AMENDED ACCUSATION

15 **JENNIFER LYNNE CARIS, M.D.**
16 **61 VERDOSO AVE**
LA SELVA BEACH CA 95076-1750

17 **Physician's and Surgeon's Certificate**
18 **No. C 55549**

19 Respondent.

20 **PARTIES**

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

24 2. On or about October 10, 2012, the Board issued Physician's and Surgeon's Certificate
25 Number C 55549 to Jennifer Lynne Caris, M.D. (Respondent). The Physician's and Surgeon's
26 Certificate was in full force and effect at all times relevant to the charges brought herein and will
27 expire on September 30, 2024, unless renewed.

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1 shall be considered to be substantially related to the qualifications, functions or duties of
2 a person holding a license, certificate or permit under the Medical Practice Act if to a
3 substantial degree it evidences present or potential unfitness of a person holding a
4 license, certificate or permit to perform the functions authorized by the license,
5 certificate or permit in a manner consistent with the public health, safety or welfare.
6 Such crimes or acts shall include but not be limited to the following: Violating or
7 attempting to violate, directly or indirectly, or assisting in or abetting the violation of, or
8 conspiring to violate any provision of the Medical Practice Act.

9 (b) In making the substantial relationship determination required under subdivision (a)
10 for a crime, the Board shall consider the following criteria:

11 (1) The nature and gravity of the offense

12 (2) The number of years that have elapsed since the date of the offense

13 (3) How the offense relates to the nature and duties of a physician and surgeon

14 (c) For purposes of subdivision (a), substantially related crimes, professional
15 misconduct, or acts shall include, but are not limited to, the following:

16 (1) Any violation of Article 6, Chapter 1, Division 2 of the Code;

17 (2) Any violation of the provision of the Osteopathic Act or the Medical Practice
18 Act

19 8. Section 821 of the Code provides that the licentiate's failure to comply with an order
20 issued under section 820 shall constitute grounds for the suspension or revocation of the
21 licentiate's certificate or license.

22 COST RECOVERY

23 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
24 administrative law judge to direct a licensee found to have committed a violation or violations of
25 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
26 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
27 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
28 included in a stipulated settlement.

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct; Criminal Conviction)**

3 10. Respondent subjected her Physician's and Surgeon's Certificate No. C55549 to
4 disciplinary action under sections 2234 [unprofessional conduct] and 2236 [criminal conviction]
5 of the Code, and California Code of Regulations, Title 16, section 1360, in that Respondent was
6 convicted of an offense substantially related to the qualifications, functions or duties of a
7 physician and surgeon, as more particularly alleged hereinafter.

8 11. On or about November 5, 2022, Santa Cruz Sheriff's Department officers responded
9 to the scene of a DUI involving Respondent. The officers found Respondent's car parked on the
10 side of the road. Officers approached Respondent outside of the car. Respondent denied to
11 officers that she had been drinking alcohol and declined to perform field sobriety tests. After
12 being transported to the hospital, Respondent underwent a breath test, yielding results of .25%
13 and .26% blood-alcohol levels.

14 12. On or about September 27, 2023, in the matter of the *People of the State of California*
15 *v. Jennifer Caris*, Case No. 22CR05172, in Santa Cruz County Superior Court, Respondent was
16 convicted of violating Vehicle Code sections 23152(b), driving under the influence of alcohol,
17 and 23578, having a blood alcohol content of higher than .15%. The Court sentenced Respondent
18 to three years' probation with various terms and conditions.

19 **SECOND CAUSE FOR DISCIPLINE**

20 **(Unprofessional Conduct)**

21 13. Respondent subjected her Physician's and Surgeon's Certificate No. C55549 to
22 disciplinary action under sections 2234 [unprofessional conduct]. The circumstances are as
23 follows:

24 14. On or about May 9, 2024, California Highway Patrol Officers responded to the scene
25 of a solo vehicle head on crash with a tree. When the officers arrived at the scene, they observed a
26 vehicle stuck between a fence and mailboxes. Respondent was asleep in the drivers' seat of the
27 vehicle with the ignition running. After waking her, Respondent was uncooperative, refusing to
28 provide the officers her name and refusing tests. One of the officers stated he observed the

1 following: Respondent's slow and slurred speech, Respondent's yellow eyes, the strong odor of
2 an alcoholic beverage coming from her breath and person, and an open bottle of whiskey on the
3 front passenger side floor. Respondent continued to ignore officers' commands and refused to
4 exit the vehicle. Three officers brought Respondent out of the vehicle. An officer told Respondent
5 he would be evaluating her sobriety and she stated, "fuck you," and continued to refuse all tests.
6 Respondent continued to be uncooperative and yelled at the officers as the officers were trying to
7 remove her from her vehicle. Respondent refused both the Chemical Breath Test and the
8 Chemical Blood Test. The officers drove Respondent to the hospital. Due to Respondent's lack of
9 cooperation and refusal to exit the vehicle upon arrival at the hospital, officers forcefully removed
10 Respondent from the vehicle and placed her in a wheelchair. Respondent placed her feet on the
11 pavement to prevent the wheelchair from moving. A blood test was completed at the hospital
12 resulting in a .23% blood alcohol content.

13 **THIRD CAUSE FOR DISCIPLINE**

14 **(Failure to Comply with Order)**

15 15. Respondent is subject to disciplinary action under Code section 821 in that
16 Respondent failed to comply with an order issued under Code section 820. The circumstances are
17 as follows:

18 16. Respondent fell asleep during a staff meeting in December 2022. On another
19 occasion, on or about December 14, 2022, when Respondent did not report to work, a co-worker
20 went to her residence for a welfare check. The co-worker rang the doorbell, but Respondent failed
21 to answer the door. The co-worker looked through the window and noticed Respondent on the
22 couch, unresponsive. The co-worker entered the house and found Respondent shaky, unfocused
23 and unaware of her surroundings. Respondent never followed up with her colleagues for her
24 failure to show up for her shift.

25 17. On or about January 5, 2023, Respondent neglected to call in a prescription for a
26 patient and failed to note the prescription in the patient chart. On or about January 13, 2023,
27 Respondent arrived to work impaired, was slurring her speech and appeared incoherent.
28

1 Respondent's movements and speech were slow. Respondent was having trouble writing notes,
2 and was asking repetitive questions.

3 18. On or about July 11, 2023, based on the allegations in paragraphs 10 through 17
4 above, the Board issued an Order Compelling Mental and Physical Examination with Drug
5 Testing, under Business and Professions Code Section 820 (Exhibit A). On or about August 21,
6 2023, Respondent, through her attorney, communicated that she is not well enough to attend a
7 scheduled mental and physical examination.

8 PRAYER

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

11 1. Revoking or suspending Physician's and Surgeon's Certificate Number C 55549,
12 issued to Respondent Jennifer Lynne Caris, M.D.;

13 2. Revoking, suspending or denying approval of Respondent Jennifer Lynne Caris,
14 M.D.'s authority to supervise physician assistants and advanced practice nurses;

15 3. Ordering Respondent Jennifer Lynne Caris, M.D. to pay the Board the costs of the
16 investigation and enforcement of this case, and if placed on probation, the costs of probation
17 monitoring; and

18 4. Taking such other and further action as deemed necessary and proper.
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22 DATED: JUL 23 2024



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