

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

In the Matter of the Accusation  
Against:

Alexis Paula Rojas, PTCN

Physician's and Surgeon's  
Certificate No. PTCN 1176

Respondent.

Case No. 800-2022-089556

DECISION

The attached Default Decision 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 21,  
2024. IT IS SO ORDERED July 22, 2024.

MEDICAL BOARD OF CALIFORNIA



Reji Varghese  
Executive Director

1 ROB BONTA  
Attorney General of California  
2 MICHAEL C. BRUMMEL  
Supervising Deputy Attorney General  
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Deputy Attorney General  
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8 *Attorneys for Complainant*

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10

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

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In the Matter of the Accusation Against:

Case No. 800-2022-089556

15

**ALEXIS PAULA ROJAS, PTCN**  
4777 Grouse Run Dr. Apt. 164  
Stockton, CA 95207-5380

**DEFAULT DECISION  
AND ORDER**

16

17

Polysomnographic Technologist License  
No. PTCN 1176

[Gov. Code, §11520]

18

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Respondent.

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**FINDINGS OF FACT**

23

1. On or about February 29, 2024, Complainant Reji Varghese, in his official capacity as  
24 the Executive Director of the Medical Board of California, Department of Consumer Affairs  
25 (“Board”), filed Accusation No. 800-2022-089556 against Alexis Paula Rojas, PTCN  
26 (“Respondent”) before the Medical Board of California.

27

2. On or about May 28, 2020, the Board issued Polysomnographic Technologist License  
28 No. PTCN 1176 to Respondent. The Polysomnographic Technologist License expired on May

1 31, 2022, and has not been renewed. A copy of the Certificate of Licensure is attached as **Exhibit**  
2 **F**.

3 3. On or about February 29, 2024, Samuel Guardado, an employee of the Complainant  
4 Agency, served by Certified and First Class Mail a copy of the Accusation No. 800-2022-089556,  
5 Statement to Respondent, Notice of Defense, Request for Discovery, and Government Code  
6 sections 11507.5, 11507.6, and 11507.7 to Respondent's address of record with the Board, which  
7 was and is:

8 4777 Grouse Run Dr. Apt. 164  
9 Stockton, CA 95207-5380.

10 A copy of the Accusation, the related documents, and Declaration of Service are attached as  
11 **Exhibit A**, and are incorporated herein by reference.

12 4. Service of the Accusation was effective as a matter of law under the provisions of  
13 Government Code section 11505, subdivision (c).

14 5. On or about March 18, 2024, the aforementioned documents were returned by the  
15 U.S. Postal Service marked "Return to Sender, Unable to Forward." A copy of the envelope  
16 returned by the post office to the Board is attached as **Exhibit B**, and is incorporated herein by  
17 reference.

18 On or about March 20, 2024, Logan Blaylock, an employee of the Department of  
19 Justice, served by Certified and First Class Mail a Courtesy Notice of Default, including a copy of  
20 the February 29, 2024 Accusation and accompanying documents, to Respondent's address of  
21 record with the Board, which was and is:

22 4777 Grouse Run Dr. Apt. 164  
23 Stockton, CA 95207-5380.

24 A copy of the Courtesy Notice of Default, including the accompanying documents,  
25 and Declaration of Service are attached as **Exhibit E**, and incorporated herein by reference. On  
26 April 15, 2024 the Department of Justice received the Courtesy Notice of Default packet  
27 previously served by Certified Mail from the Post Office. The Post Office documented the  
28 following: "Return to Sender, Unable to Forward" and returned the Courtesy Default packet. A

1 copy of the return envelopes for the Courtesy Notice of Default are included in **Exhibit C** and  
2 **Exhibit D**, both the copy sent by regular mail and the copy sent by certified mail.

3 6. Business and Professions Code section 118 states, in pertinent part:

4 (b) The suspension, expiration, or forfeiture by operation of law of a license  
5 issued by a board in the department, or its suspension, forfeiture, or cancellation by  
6 order of the board or by order of a court of law, or its surrender without the written  
7 consent of the board, shall not, during any period in which it may be renewed,  
8 restored, reissued, or reinstated, deprive the board of its authority to institute or  
9 continue a disciplinary proceeding against the licensee upon any ground provided by  
10 law or to enter an order suspending or revoking the license or otherwise taking  
11 disciplinary action against the license on any such ground.

12 7. Government Code section 11506 states, in pertinent part:

13 (c) The respondent shall be entitled to a hearing on the merits if the respondent  
14 files a notice of defense, and the notice shall be deemed a specific denial of all parts  
15 of the accusation not expressly admitted. Failure to file a notice of defense shall  
16 constitute a waiver of respondent's right to a hearing, but the agency in its discretion  
17 may nevertheless grant a hearing.

18 Respondent failed to file a Notice of Defense within 15 days after service upon her of the  
19 Accusation, and therefore waived her right to a hearing on the merits of Accusation No. 800-  
20 2022-089556. Respondent's failure to file a Notice of Defense is further set forth in **Exhibit G**,  
21 Declaration of DAG John S. Gatschet.

22 8. California Government Code section 11520 states, in pertinent part:

23 (a) If the respondent either fails to file a notice of defense or to appear at the  
24 hearing, the agency may take action based upon the respondent's express admissions  
25 or upon other evidence and affidavits may be used as evidence without any notice to  
26 respondent.

27 9. Business and Professions Code section 125.3 states, in pertinent part:

28 (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.

10 Pursuant to its authority under Government Code section 11520, the Board finds  
11 Respondent is in default. The Board will take action without further hearing and, based on  
12 Respondent's express admissions by way of default and the evidence before it, contained in

1 Exhibits A, B, C, D, E, F, G, H, and I, finds that the allegations in Accusation No. 800-2022-  
2 089556 are true.

3 **DETERMINATION OF ISSUES**

4 1. Based on the foregoing findings of fact, Respondent Alexis Paula Rojas, PTCN has  
5 subjected her Polysomnographic Technologist License No. PTCN 1176 to discipline.

6 2. A copy of the Accusation and the related documents and Declaration of Service are  
7 attached here as Exhibit A, B, C, D, E, F, G, H, and I.

8 3. The Board has jurisdiction to adjudicate this case by default.

9 4. Pursuant to Business and Professions Code section 125.3, the Board is authorized to  
10 order Respondent to pay the Board the reasonable costs of investigation and enforcement of the  
11 case prayed for in the Accusation total \$ **8,819.75** based on the Certification of Costs attached as  
12 **Exhibit H** in the Exhibit Package.

13 5. The Medical Board of California is authorized to revoke Respondent's  
14 Polysomnographic Technologist License based upon the following violations alleged in the  
15 Accusation:

16 6 On November 20, 2021, at approximately 1:00 a.m., two California Highway Patrol  
17 Officers ("Officers") received a broadcast of a collision occurring on southbound Interstate 5 in  
18 Stockton, California. The Officers responded to the site of the collision at 1:28 a.m. The Officers  
19 observed a silver 2017 Chevrolet Cruze ("Cruze") parked on the west shoulder of Interstate 5 and  
20 Respondent standing outside the vehicle. Respondent identified herself as the driver and sole  
21 occupant of the Cruze. Respondent stated that she was unsure, but thought she might have hit the  
22 rear of a semi-truck while driving. The Officers observed that the Cruze had suffered damage to  
23 the hood of the vehicle consistent with colliding with the rear of a semi-truck trailer. The airbags  
24 in the Cruze were deployed. The semi-truck trailer was not on scene when the officers arrived  
25 and there was no evidence to assist in identifying the trailer that Respondent had hit.

26 7 The Officers observed that Respondent's eyes were red and watery, her speech was  
27 slurred, and there was an odor of an alcoholic beverage on her breath and person. As Respondent  
28 had self-admitted that she had hit the back of a semi-truck trailer while operating a vehicle, the

1 Officers performed a driving under the influence investigation. Respondent stated she had one  
2 hard seltzer at 7:00 p.m. before law enforcement made contact with her. The Officers had  
3 Respondent perform field sobriety tests as part of their investigation. During the Horizontal Gaze  
4 Nystagmus test, the Officers observed a lack of smooth pursuit with distinct sustained nystagmus  
5 at maximum deviation, and an early on-set of sustained nystagmus. During the One Leg Stand  
6 test, the Officers observed Respondent pick up her left foot up and set it down four times during  
7 the test and that she held her arms out more than six inches from her sides. During the Walk and  
8 Turn test, Respondent used her arms for balance, stepped off the line, and on the turn, Respondent  
9 incorrectly turned 90 degrees and started walking towards the lanes of traffic. The Officers  
10 stopped the test to prevent Respondent from walking out into traffic. Finally, Respondent  
11 declined to take a preliminary alcohol screening device test. The Officers placed Respondent  
12 under arrest for driving under the influence.

13       8 Pursuant to implied consent law, Respondent opted to take a breath alcohol test. At  
14 approximately 2:00 a.m., Respondent provided a blood alcohol content sample of .12% and .11%.  
15 On January 28, 2022, the San Joaquin County District Attorney's Office filed a misdemeanor  
16 criminal complaint in *The People of the State of California vs. Alexis Paula Rojas*, Case No.  
17 STK-CR-MDUI-2022-0001110. The complaint alleged that Respondent operated a motor vehicle  
18 on or about November 20, 2021, while under the influence of alcohol in violation of misdemeanor  
19 Vehicle Code section 23152, subdivisions (a) and (b). On June 27, 2022, Respondent pled no  
20 contest to a misdemeanor violation of Vehicle Code 23152, subdivision (b), in the above-entitled  
21 criminal case. That same day, Respondent was sentenced to three years' informal probation,  
22 ordered to obey all laws, ordered to serve two days in custody with custody for time served, pay  
23 fines and fees, and ordered to complete a 3-month DMV approved alcohol program. A copy of  
24 the certified conviction documents are attached as **Exhibit I**.

25       9 On August 30, 2023, a Board investigator interviewed Respondent. Respondent  
26 stated she consumed six hard seltzers and three shots of tequila at a friend's house before driving  
27 on November 20, 2021. Respondent stated she began drinking at 6:00 p.m. on November 19,  
28 2021, and stopped drinking at 10:30 pm on November 19, 2021.

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Use of Alcoholic Beverages to the Extent, or in a Manner, as to be Dangerous to**  
3 **Respondent, Another Person or the Public)**

4 10 Respondent has subjected her license to disciplinary action under section 2227, as  
5 defined by section 2234, subdivision (a), 2239, 2529.1, and 3576 of the Code, in that she used  
6 alcoholic beverages to the extent, or in such a manner, as to be dangerous or injurious to herself,  
7 another person, or the public, as more particularly alleged in paragraphs 12 through 15, which are  
8 hereby incorporated by reference and re-alleged as if fully set forth herein.

9 **SECOND CAUSE FOR DISCIPLINE**

10 **(Conviction of a Crime Substantially Related to the Qualifications, Functions, or Duties of a**  
11 **Polysomnographic Technician)**

12 11. Respondent has subjected her license to disciplinary action under section 2227, as  
13 defined by sections 2234, subdivision (a), 2236, and 3576 of the Code in that she was convicted  
14 of a crime of an offense substantially related to the qualifications, functions, and duties of a  
15 polysomnographic technician, as more particularly alleged in paragraphs 12 through 15, which  
16 are hereby incorporated by reference and re-alleged as if set forth herein.

17  
18 **ORDER**

19 IT IS SO ORDERED that Polysomnographic Technologist License No. PTCN 1176,  
20 heretofore issued to Respondent Alexis Paula Rojas, PTCN, is revoked. Respondent Alexis Paula  
21 Rojas, PTCN is ordered to pay the Board the costs of the investigation and enforcement of this  
22 case in the amount of \$ 8,819.75.

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1 ROB BONTA  
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7 Facsimile: (916) 327-2247

8 *Attorneys for Complainant*

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

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14 In the Matter of the Accusation Against:

Case No. 800-2022-089556

15

**Alexis P. Rojas  
4777 Grouse Run Dr. Apt. 164  
Stockton, CA 95207-5380**

**ACCUSATION**

16

17

**Polysomnographic Technician License  
No. PTCN 1176,**

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Respondent.

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**PARTIES**

22

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

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2. On or about May 28, 2020, the Medical Board issued Polysomnographic Technologist License No. PTCN 1176 to Alexis P. Rojas ("Respondent"). The Polysomnographic Technologist License expired on May 31, 2022. Respondent has failed to pay her registration renewal fee, the license is delinquent, and no practice is permitted at this time.

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28

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 118, subdivision (b), of the Code provides, in pertinent part, that the  
6 expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary  
7 action during the period within which the license may be renewed, restored, reissued or  
8 reinstated.

9 STATUTORY PROVISIONS

10 5. Section 2227 of the Code provides, in pertinent part, that a licensee who is found  
11 guilty under the Medical Practice Act may have his or her license revoked, suspended for a period  
12 not to exceed one year, placed on probation and required to pay the costs of probation monitoring,  
13 or such other action taken in relation to discipline as the Board deems proper.

14 6. Section 3576 of the Code states, in pertinent part:

15 (a) A registration under this chapter may be denied, suspended, revoked, placed  
16 on probation, or otherwise subjected to discipline for any of the following by the  
holder:

17 ...

18 (3) Committing any act or being convicted of a crime constituting grounds for  
denial of licensure or registration under Section 480.

19 (4) Violating or attempting to violate this chapter or any regulation adopted  
20 under this chapter.

21 (b) Proceedings under this section shall be conducted in accordance with  
22 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the  
Government Code, and the board shall have all powers granted therein.

23 7. Section 2529.1 of the Code states:

24 (a) The use of any controlled substance or the use of any of the dangerous drugs  
25 specified in Section 4022, or of alcoholic beverages, to the extent, or in such a  
26 manner as to be dangerous or injurious to the registrant, or to any other person or to  
the public, or to the extent that this use impairs the ability of the registrant to practice  
27 safely or more than one misdemeanor or any felony conviction involving the use,  
consumption, or self-administration of any of the substances referred to in this  
28 section, or any combination thereof, constitutes unprofessional conduct. The record of  
the conviction is conclusive evidence of this unprofessional conduct.

1 (b) A plea or verdict of guilty or a conviction following a plea of nolo  
2 contendere is deemed to be a conviction within the meaning of this section. The board  
3 may order discipline of the registrant in accordance with Section 2227 or may order  
4 the denial of the registration when the time for appeal has elapsed or the judgment of  
5 conviction has been affirmed on appeal or when an order granting probation is made  
6 suspending imposition of sentence, irrespective of a subsequent order under the  
7 provisions of Section 1203.4 of the Penal Code allowing this person to withdraw his  
8 or her plea of guilty and to enter a plea of not guilty, or setting aside the verdict of  
9 guilty, or dismissing the accusation, complaint, information, or indictment.

10 8. Section 2234 of the Code, states:

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

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

16 ...

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

18 ...

19 9. Section 2236 of the Code states:

20 (a) The conviction of any offense substantially related to the qualifications,  
21 functions, or duties of a physician and surgeon constitutes unprofessional conduct  
22 within the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record  
23 of conviction shall be conclusive evidence only of the fact that the conviction  
24 occurred.

25 (b) The district attorney, city attorney, or other prosecuting agency shall notify  
26 the Medical Board of the pendency of an action against a licensee charging a felony  
27 or misdemeanor immediately upon obtaining information that the defendant is a  
28 licensee. The notice shall identify the licensee and describe the crimes charged and  
the facts alleged. The prosecuting agency shall also notify the clerk of the court in  
which the action is pending that the defendant is a licensee, and the clerk shall record  
prominently in the file that the defendant holds a license as a physician and surgeon.

(c) The clerk of the court in which a licensee is convicted of a crime shall,  
within 48 hours after the conviction, transmit a certified copy of the record of  
conviction to the board. The division may inquire into the circumstances surrounding  
the commission of a crime in order to fix the degree of discipline or to determine if  
the conviction is of an offense substantially related to the qualifications, functions, or  
duties of a physician and surgeon.

(d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is  
deemed to be a conviction within the meaning of this section and Section 2236.1.  
The record of conviction shall be conclusive evidence of the fact that the conviction  
occurred.

10. Section 2239 of the Code states:

(a) The use or prescribing for or administering to himself or herself, of any

1 controlled substance; or the use of any of the dangerous drugs specified in Section  
2 4022, or of alcoholic beverages, to the extent, or in such a manner as to be dangerous  
3 or injurious to the licensee, or to any other person or to the public, or to the extent that  
4 such use impairs the ability of the licensee to practice medicine safely or more than  
5 one misdemeanor or any felony involving the use, consumption, or  
6 self-administration of any of the substances referred to in this section, or any  
7 combination thereof, constitutes unprofessional conduct. The record of the  
8 conviction is conclusive evidence of such unprofessional conduct.

9 (b) A plea or verdict of guilty or a conviction following a plea of nolo  
10 contendere is deemed to be a conviction within the meaning of this section. The  
11 Medical Board may order discipline of the licensee in accordance with Section 2227  
12 or the Medical Board may order the denial of the license when the time for appeal has  
13 elapsed or the judgment of conviction has been affirmed on appeal or when an order  
14 granting probation is made suspending imposition of sentence, irrespective of a  
15 subsequent order under the provisions of Section 1203.4 of the Penal Code allowing  
16 such person to withdraw his or her plea of guilty and to enter a plea of not guilty, or  
17 setting aside the verdict of guilty, or dismissing the accusation, complaint,  
18 information, or indictment.

### 19 COST RECOVERY

20 11. Section 125.3 of the Code states:

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

27 (b) In the case of a disciplined licensee that is a corporation or a partnership, the  
28 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.

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

3 (2) Notwithstanding paragraph (1), the board may, in its discretion,  
conditionally renew or reinstate for a maximum of one year the license of any  
4 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  
5 costs.

6 (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  
7 to be available upon appropriation by the Legislature.

8 (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.

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

#### 11 FACTUAL ALLEGATIONS

12 12. On November 20, 2021, at approximately 1:00 a.m., two California Highway Patrol  
13 Officers ("Officers") received a broadcast of a collision occurring on southbound Interstate 5 in  
14 Stockton, California. The Officers responded to the site of the collision at 1:28 a.m. The Officers  
15 observed a silver 2017 Chevrolet Cruze ("Cruze") parked on the west shoulder of Interstate 5 and  
16 Respondent standing outside the vehicle. Respondent identified herself as the driver and sole  
17 occupant of the Cruze. Respondent stated that she was unsure, but thought she might have hit the  
18 rear of a semi-truck while driving. The Officers observed that the Cruze had suffered damage to  
19 the hood of the vehicle consistent with colliding with the rear of a semi-truck trailer. The airbags  
20 in the Cruze were deployed. The semi-truck trailer was not on scene when the officers arrived  
21 and there was no evidence to assist in identifying the trailer that Respondent had hit.

22 13. The Officers observed that Respondent's eyes were red and watery, her speech was  
23 slurred, and there was an odor of an alcoholic beverage on her breath and person. As Respondent  
24 had self-admitted that she had hit the back of a semi-truck trailer while operating a vehicle, the  
25 Officers performed a driving under the influence investigation. Respondent stated she had one  
26 hard seltzer at 7:00 p.m. before law enforcement made contact with her. The Officers had  
27 Respondent perform field sobriety tests as part of their investigation. During the Horizontal Gaze  
28 Nystagmus test, the Officers observed a lack of smooth pursuit with distinct sustained nystagmus

1 at maximum deviation, and an early on-set of sustained nystagmus. During the One Leg Stand  
2 test, the Officers observed Respondent pick up her left foot and set it down four times during the  
3 test and that she held her arms out more than six inches from her sides. During the Walk and  
4 Turn test, Respondent used her arms for balance, stepped off the line, and on the turn, Respondent  
5 incorrectly turned 90 degrees and started walking towards the lanes of traffic. The Officers  
6 stopped the test to prevent Respondent from walking out into traffic. Finally, Respondent  
7 declined to take a preliminary alcohol screening device test. The Officers placed Respondent  
8 under arrest for driving under the influence.

9 14. Pursuant to implied consent law, Respondent opted to take a breath alcohol test. At  
10 approximately 2:00 a.m., Respondent provided a blood alcohol content sample of .12% and .11%.  
11 On January 28, 2022, the San Joaquin County District Attorney's Office filed a misdemeanor  
12 criminal complaint in *The People of the State of California vs. Alexis Paula Rojas*, Case No.  
13 STK-CR-MDUI-2022-0001110. The complaint alleged that Respondent operated a motor vehicle  
14 on or about November 20, 2021, while under the influence of alcohol in violation of misdemeanor  
15 Vehicle Code section 23152, subdivisions (a) and (b). On June 27, 2022, Respondent pled no  
16 contest to a misdemeanor violation of Vehicle Code 23152, subdivision (b), in the above-entitled  
17 criminal case. That same day, Respondent was sentenced to three years' informal probation,  
18 ordered to obey all laws, ordered to serve two days in custody with custody for time served, pay  
19 fines and fees, and ordered to complete a 3-month DMV approved alcohol program.

20 15. On August 30, 2023, a Board investigator interviewed Respondent. Respondent  
21 stated she consumed six hard seltzers and three shots of tequila at a friend's house before driving  
22 on November 20, 2021. Respondent stated she began drinking at 6:00 p.m. on November 19,  
23 2021, and stopped drinking at 10:30 pm on November 19, 2021.

24 **FIRST CAUSE FOR DISCIPLINE**

25 **(Use of Alcoholic Beverages to the Extent, or in a Manner, as to be Dangerous to**  
26 **Respondent, Another Person or the Public)**

27 16. Respondent has subjected her license to disciplinary action under section 2227, as  
28 defined by sections 2234, subdivision (a), 2239, 2529.1, and 3576 of the Code, in that she used

1 alcoholic beverages to the extent, or in such a manner, as to be dangerous or injurious to herself,  
2 another person, or the public, as more particularly alleged in paragraphs 12 through 15, which are  
3 hereby incorporated by reference and re-alleged as if fully set forth herein.

4 **SECOND CAUSE FOR DISCIPLINE**

5 **(Conviction of a Crime Substantially Related to the Qualifications, Functions, or Duties of a**  
6 **Polysomnographic Technician)**

7 17. Respondent has subjected her license to disciplinary action under section 2227, as  
8 defined by sections 2234, subdivision (a), 2236, and 3576 of the Code in that she was convicted  
9 of a crime substantially related to the qualifications, functions, and duties of a polysomnographic  
10 technician, as more particularly alleged in paragraphs 12 through 15, which are hereby  
11 incorporated by reference and re-alleged as if set forth herein.

12 **PRAYER**


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

15 1. Revoking or suspending Polysomnographic Technician License No. PTCN 1176,  
16 issued to Respondent Alexis P. Rojas;

17 2. Ordering Respondent Alexis P. Rojas to pay the Board the costs of the investigation  
18 and enforcement of this case, and if placed on probation, to pay the Board the costs of probation  
19 monitoring; and

20 3. Taking such other and further action as deemed necessary and proper.

21  
22 DATED: FEB 29 2024

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

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