

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

In the Matter of the Accusation Against:

Case No. 800-2018-040046

**Martin Chan-Hoi Leung, M.D.  
598 Bosworth Street, Suite 2  
San Francisco, CA 94131**

**AGREEMENT FOR  
SURRENDER OF LICENSE**

**Physician's and Surgeon's  
Certificate No. G 39648**

Respondent.

**TO ALL PARTIES:**

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

1. Complainant, Reji Varghese, is the Executive Director of the Medical Board of California, Department of Consumer Affairs ("Board").
2. Martin Chan-Hoi Leung, M.D. ("Respondent") has carefully read and fully understands the effect of this Agreement.
3. Respondent understands that by signing this Agreement he is enabling the Board to issue this order accepting the surrender of license without further process. Respondent understands and agrees that Board staff and counsel for complainant may communicate directly with the Board regarding this Agreement, without notice to or participation by Respondent. The Board will not be disqualified from further action in this matter by virtue of its consideration of this Agreement.
4. Respondent acknowledges there is current disciplinary action against his license, that on February 20, 2024, a Decision after Superior Court Remand became effective wherein he was issued a probationary license for a period of five (5) years with various terms and conditions.

1 5. The current disciplinary action provides in pertinent part, "Following the effective  
2 date of this Decision, if Respondent ceases practicing due to retirement or health reasons or is  
3 otherwise unable to satisfy the terms and conditions of probation, Respondent may request to  
4 surrender his Certificate." (Condition #10).

5 6. Upon acceptance of the Agreement by the Board, Respondent understands he will no  
6 longer be permitted to practice as a physician and surgeon in California, and also agrees to  
7 surrender his wallet certificate, wall license and any D.E.A. Certificate(s) for an address in  
8 California.

9 7. Respondent fully understands and agrees that if Respondent ever files an application  
10 for re-licensure or reinstatement in the State of California, the Board shall treat it as a Petition for  
11 Reinstatement of a revoked license in effect at the time the Petition is filed. In addition, any  
12 Medical Board Investigation Report(s), including all referenced documents and other exhibits,  
13 upon which the Board is predicated, and any such Investigation Report(s), attachments, and other  
14 exhibits, that may be generated subsequent to the filing of this Agreement for Surrender of  
15 License, shall be admissible as direct evidence, and any time-based defenses, such as laches or  
16 any applicable statute of limitations, shall be waived when the Board determines whether to grant  
17 or deny the Petition.

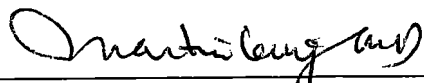
18 8. Respondent shall pay the agency its costs of investigation and enforcement in the  
19 amount of \$12,178.75 prior to issuance of a new or reinstated license.  
20

21 **ACCEPTANCE**

22 I, Martin Chan-Hoi Leung, M.D., have carefully read the above Agreement and enter into it  
23 freely and voluntarily, with the optional advice of counsel, and with full knowledge of its force  
24 and effect, do hereby surrender Physician's and Surgeon's Certificate No. G 39648, to the  
25 Medical Board of California for its acceptance. By signing this Agreement for Surrender of  
26 License, I recognize that upon its formal acceptance by the Board, I will lose all rights and  
27 privileges to practice as a Physician and Surgeon in the State of California and that I have  
28 //

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

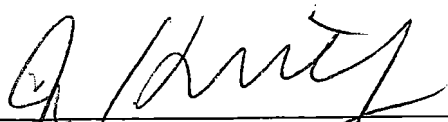
delivered to the Board my wallet certificate and wall license.



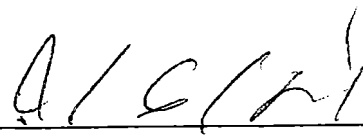
MARTIN CHAN-HOI LEUNG, M.D.  
Respondent

8/22/2024

Date



Attorney or Witness  
*J. B. Kraut*



Date



REJI VARGHESE  
Executive Director  
Medical Board of California  
Complainant

SEP 26 2024

Date

SF2020400779  
Leung Surrender While on Probation.docx