

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

In the Matter of the Statement of Issues
Against:

File No. 800-2023-102482

Yasaman Jaladat

Applicant.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby accepted and 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 6, 2025**, although the probation will not commence until the applicant completes any remaining requirements for licensure and the license is issued.

ORDERED: December 19, 2024

MEDICAL BOARD OF CALIFORNIA

By: Michelle A. Bholat, MD
Michelle A. Bholat, M.D., Chair
Panel A

1 ROB BONTA
Attorney General of California
2 MATTHEW M. DAVIS
Supervising Deputy Attorney General
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8 *Attorneys for Complainant*

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

13
14 In the Matter of the Statement of Issues
Against:

15 **YASAMAN JALADAT**
11234 Anderson St., #MC-2516
16 Loma Linda, CA 92354-2804

17
18 Applicant.

Case No. 800-2023-102482

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

19
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 Jason J. Ahn, Deputy
26 Attorney General.

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2. Applicant Yasaman Jaladat (Applicant) is represented in this proceeding by attorney Emily L. Brinkman, whose address is: 44 Montgomery Street, Ste 3500, San Francisco, CA 94104.

3. On or about March 6, 2024, Applicant filed an application dated March 6, 2024, with the Medical Board of California to obtain a Physician's and Surgeon's Certificate.

JURISDICTION

4. On June 20, 2024, Statement of Issues No. 800-2023-102482 was filed before the Board, and is currently pending against Applicant. The Statement of Issues and all other statutorily required documents were properly served on Applicant on or about June 20, 2024.

5 A copy of Statement of Issues No. 800-2023-102482 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Applicant has carefully read, fully discussed with counsel, and fully understands the charges and allegations in Statement of Issues No. 800-2023-102482. Applicant has also carefully read, fully discussed with her counsel, and fully understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Applicant is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Statement of Issues; 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.

8. Applicant voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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1 **CULPABILITY**

2 9. Applicant understands and agrees that the charges and allegations contained in
3 Statement of Issues No. 800-2023-102482, if proven at a hearing, constitute cause for denying
4 application for a physician's and surgeon's certificate. Applicant fully agrees that, at a hearing,
5 Complainant could establish a prima facie case or factual basis for the charges in the Statement of
6 Issues, and that Applicant hereby gives up her right to contest those charges.

7 10. Applicant agrees that her application for a physician's and surgeon's certificate is
8 subject to denial and agrees to be bound by the Board's probationary terms and conditions as set
9 forth in the Disciplinary Order below.

10 **CONTINGENCY**

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

21 12. Applicant agrees that if she ever petitions for early termination or modification of
22 probation, or if an accusation and/or petition to revoke probation is filed against her before the
23 Board, all of the charges and allegations contained in Statement of Issues No. 800-2023-102482
24 shall be deemed true, correct and fully admitted by Applicant for purposes of any such
25 proceeding or any other licensing proceeding involving Applicant in the State of California.

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1 personal relationship with Applicant, or other relationship that could reasonably be expected to
2 compromise the ability of the monitor to render fair and unbiased reports to the Board, including
3 but not limited to any form of bartering, shall be in Applicant's field of practice, and must agree
4 to serve as Applicant's monitor. Applicant shall pay all monitoring costs.

5 The Board or its designee shall provide the approved monitor with copies of the Decision(s)
6 and Accusation(s), and a proposed monitoring plan. Within 15 calendar days of receipt of the
7 Decision(s), Accusation(s), and proposed monitoring plan, the monitor shall submit a signed
8 statement that the monitor has read the Decision(s) and Accusation(s), fully understands the role
9 of a monitor, and agrees or disagrees with the proposed monitoring plan. If the monitor disagrees
10 with the proposed monitoring plan, the monitor shall submit a revised monitoring plan with the
11 signed statement for approval by the Board or its designee.

12 Within 60 calendar days of the effective date of this Decision, and continuing throughout
13 probation, Applicant's practice shall be monitored by the approved monitor. Applicant shall
14 make all records available for immediate inspection and copying on the premises by the monitor
15 at all times during business hours and shall retain the records for the entire term of probation.

16 If Applicant fails to obtain approval of a monitor within 60 calendar days of the effective
17 date of this Decision, Applicant shall receive a notification from the Board or its designee to
18 cease the practice of medicine within three (3) calendar days after being so notified. Applicant
19 shall cease the practice of medicine until a monitor is approved to provide monitoring
20 responsibility.

21 The monitor(s) shall submit a quarterly written report to the Board or its designee which
22 includes an evaluation of Applicant's performance, indicating whether Applicant's practices are
23 within the standards of practice of medicine, and whether Applicant is practicing medicine safely,
24 billing appropriately or both. It shall be the sole responsibility of Applicant to ensure that the
25 monitor submits the quarterly written reports to the Board or its designee within 10 calendar days
26 after the end of the preceding quarter.

27 If the monitor resigns or is no longer available, Applicant shall, within 5 calendar days of
28 such resignation or unavailability, submit to the Board or its designee, for prior approval, the

1 name and qualifications of a replacement monitor who will be assuming that responsibility within
2 15 calendar days. If Applicant fails to obtain approval of a replacement monitor within 60
3 calendar days of the resignation or unavailability of the monitor, Applicant shall receive a
4 notification from the Board or its designee to cease the practice of medicine within three (3)
5 calendar days after being so notified. Applicant shall cease the practice of medicine until a
6 replacement monitor is approved and assumes monitoring responsibility.

7 In lieu of a monitor, Applicant may participate in a professional enhancement program
8 approved in advance by the Board or its designee that includes, at minimum, quarterly chart
9 review, semi-annual practice assessment, and semi-annual review of professional growth and
10 education. Applicant shall participate in the professional enhancement program at Applicant's
11 expense during the term of probation.

12 3. SOLO PRACTICE PROHIBITION. Applicant is prohibited from engaging in the
13 solo practice of medicine. Prohibited solo practice includes, but is not limited to, a practice
14 where: 1) Applicant merely shares office space with another physician but is not affiliated for
15 purposes of providing patient care, or 2) Applicant is the sole physician practitioner at that
16 location.

17 If Applicant fails to establish a practice with another physician or secure employment in an
18 appropriate practice setting within 60 calendar days of the effective date of this Decision,
19 Applicant shall receive a notification from the Board or its designee to cease the practice of
20 medicine within three (3) calendar days after being so notified. The Applicant shall not resume
21 practice until an appropriate practice setting is established.

22 If, during the course of the probation, the Applicant's practice setting changes and the
23 Applicant is no longer practicing in a setting in compliance with this Decision, the Applicant shall
24 notify the Board or its designee within five (5) calendar days of the practice setting change. If
25 Applicant fails to establish a practice with another physician or secure employment in an
26 appropriate practice setting within 60 calendar days of the practice setting change, Applicant shall
27 receive a notification from the Board or its designee to cease the practice of medicine within three
28 (3) calendar days after being so notified. The Applicant shall not resume practice until an

appropriate practice setting is established.

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

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

5. SUPERVISION OF PHYSICIAN ASSISTANTS AND ADVANCED PRACTICE NURSES. During probation, Applicant is prohibited from supervising physician assistants and advanced practice nurses.

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

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

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

8. GENERAL PROBATION REQUIREMENTS.

Compliance with Probation Unit

Applicant shall comply with the Board's probation unit.

Address Changes

Applicant shall, at all times, keep the Board informed of Applicant's business and residence addresses, email address (if available), and telephone number. Changes of such addresses shall be immediately communicated in writing to the Board or its designee. Under no circumstances shall a post office box serve as an address of record, except as allowed by Business and

1 Professions Code section 2021, subdivision (b).

2 Place of Practice

3 Applicant shall not engage in the practice of medicine in Applicant's or patient's place of
4 residence, unless the patient resides in a skilled nursing facility or other similar licensed facility.

5 License Renewal

6 Applicant shall maintain a current and renewed California physician's and surgeon's
7 license.

8 Travel or Residence Outside California

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

12 In the event Applicant should leave the State of California to reside or to practice Applicant
13 shall notify the Board or its designee in writing 30 calendar days prior to the dates of departure
14 and return.

15 9. INTERVIEW WITH THE BOARD OR ITS DESIGNEE. Applicant shall be
16 available in person upon request for interviews either at Applicant's place of business or at the
17 probation unit office, with or without prior notice throughout the term of probation.

18 10. NON-PRACTICE WHILE ON PROBATION. Applicant shall notify the Board or its
19 designee in writing within 15 calendar days of any periods of non-practice lasting more than 30
20 calendar days and within 15 calendar days of Applicant's return to practice. Non-practice is
21 defined as any period of time Applicant is not practicing medicine as defined in Business and
22 Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month in direct
23 patient care, clinical activity or teaching, or other activity as approved by the Board. If Applicant
24 resides in California and is considered to be in non-practice, Applicant shall comply with all
25 terms and conditions of probation. All time spent in an intensive training program which has
26 been approved by the Board or its designee shall not be considered non-practice and does not
27 relieve Applicant from complying with all the terms and conditions of probation. Practicing
28 medicine in another state of the United States or Federal jurisdiction while on probation with the

1 medical licensing authority of that state or jurisdiction shall not be considered non-practice. A
2 Board-ordered suspension of practice shall not be considered as a period of non-practice.

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

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

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

10 Periods of non-practice for a Applicant residing outside of California will relieve Applicant
11 of the responsibility to comply with the probationary terms and conditions with the exception of
12 this condition and the following terms and conditions of probation: Obey All Laws; General
13 Probation Requirements; Quarterly Declarations.

14 11. COMPLETION OF PROBATION. Applicant shall comply with all financial
15 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
16 completion of probation. This term does not include cost recovery, which is due within 30
17 calendar days of the effective date of the Order, or by a payment plan approved by the Medical
18 Board and timely satisfied. Upon successful completion of probation, Applicant's certificate
19 shall be fully restored.

20 12. VIOLATION OF PROBATION. Failure to fully comply with any term or condition
21 of probation is a violation of probation. If Applicant violates probation in any respect, the Board,
22 after giving Applicant notice and the opportunity to be heard, may revoke probation and carry out
23 the disciplinary order that was stayed. If an Accusation, or Petition to Revoke Probation, or an
24 Interim Suspension Order is filed against Applicant during probation, the Board shall have
25 continuing jurisdiction until the matter is final, and the period of probation shall be extended until
26 the matter is final.

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

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

15 15. FUTURE ADMISSIONS CLAUSE. If Applicant should ever apply or reapply for a
16 new license or certification, or petition for reinstatement of a license, by any other health care
17 licensing action agency in the State of California, all of the charges and allegations contained in
18 Statement of Issues No. 800-2023-102482 shall be deemed to be true, correct, and admitted by
19 Applicant for the purpose of any Statement of Issues or any other proceeding seeking to deny or
20 restrict license.

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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, Emily L. Brinkman. I understand the stipulation and the effect it
4 will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and
5 Disciplinary Order voluntarily, knowingly, and intelligently, and fully agree to be bound by the
6 Decision and Order of the Medical Board of California.

7
8 DATED: 8/2/24

JALADAT
9 YASAMAN JALADAT, PTL
10 Applicant

11
12 I have read and fully discussed with Applicant Yasaman Jaladat, PTL, the terms and
13 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
14 I approve its form and content.

15
16 DATED: August 2, 2024

Emily L. Brinkman
17 EMILY L. BRINKMAN
18 Attorney for Applicant

ENDORSEMENT

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

DATED: August 16, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California
MATTHEW M. DAVIS
Supervising Deputy Attorney General



JASON J. AHN
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Statement of Issues No. 800-2023-102482

1 ROB BONTA
Attorney General of California
2 MATTHEW M. DAVIS
Supervising Deputy Attorney General
3 JASON J. AHN
Deputy Attorney General
4 State Bar No. 253172
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8 *Attorneys for Complainant*

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

13 In the Matter of the Statement of Issues
Against:

Case No. 800-2023-102482

14 **YASAMAN JALADAT**
15 **11234 Anderson St, Rm 2516**
16 **Loma Linda, CA 92354-2804**

STATEMENT OF ISSUES

17 Applicant.

19
20 **PARTIES**

21 1. Reji Varghese (Complainant) brings this Statement of Issues solely in his official
22 capacity as the Executive Director of the Medical Board of California.

23 2. On or about March 6, 2023, the Medical Board of California, Department of
24 Consumer Affairs received an application for a Transition from Postgraduate Training License to
25 a Physician's and Surgeon's License from Yasaman Jaladat (Respondent). On or about March 6,
26 2023, Respondent certified under penalty of perjury to the truthfulness of all statements, answers,
27 and representations in the application. The Board denied the application on March 18, 2024.

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JURISDICTION

3. This Statement of Issues is brought before the Medical Board of California (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 475 of the Code states:

(a) Notwithstanding any other provisions of this code, the provisions of this division shall govern the denial of licenses on the grounds of:

(1) Knowingly making a false statement of material fact, or knowingly omitting to state a material fact, in an application for a license.

(2) Conviction of a crime.

(3) Commission of any act involving dishonesty, fraud or deceit with the intent to substantially benefit himself or another, or substantially injure another.

(4) Commission of any act which, if done by a licensee of the business or profession in question, would be grounds for suspension or revocation of license.

(b) Notwithstanding any other provisions of this code, the provisions of this division shall govern the suspension and revocation of licenses on grounds specified in paragraphs (1) and (2) of subdivision (a).

(c) A license shall not be denied, suspended, or revoked on the grounds of a lack of good moral character or any similar ground relating to an applicant's character, reputation, personality, or habits.

5. Section 480 of the Code states:

"...

(e) A board may deny a license regulated by this code on the ground that the applicant knowingly made a false statement of fact that is required to be revealed in the application for the license. A board shall not deny a license based solely on an applicant's failure to disclose a fact that would not have been cause for denial of the license had it been disclosed.

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1 6. Section 2221 of the Code states:

2 (a) The board may deny a physician's and surgeon's certificate to an applicant
3 guilty of unprofessional conduct or of any cause that would subject a licensee to
4 revocation or suspension of their license. The board, in its sole discretion, may issue a
probationary physician's and surgeon's certificate to an applicant subject to terms and
conditions, including, but not limited to, any of the following conditions of probation:

5 (1) Practice limited to a supervised, structured environment where the
6 licensee's activities shall be supervised by another physician and surgeon.

7 (2) Total or partial restrictions on drug prescribing privileges for controlled
substances.

8 (3) Continuing medical or psychiatric treatment.

9 (4) Ongoing participation in a specified rehabilitation program.

10 (5) Enrollment and successful completion of a clinical training program.

11 (6) Abstention from the use of alcohol or drugs.

12 (7) Restrictions against engaging in certain types of medical practice.

13 (8) Compliance with all provisions of this chapter.

14 (9) Payment of the cost of probation monitoring.

15 (b) The board may modify or terminate the terms and conditions imposed on
16 the probationary certificate upon receipt of a petition from the licensee. The board
may assign the petition to an administrative law judge designated in Section 11371 of
17 the Government Code. After a hearing on the petition, the administrative law judge
shall provide a proposed decision to the board.

18 (c) The board shall deny a physician's and surgeon's certificate to an applicant
19 who is required to register pursuant to Section 290 of the Penal Code. This
subdivision does not apply to an applicant who is required to register as a sex
20 offender pursuant to Section 290 of the Penal Code solely because of a misdemeanor
conviction under Section 314 of the Penal Code.

21 (d) An applicant shall not be eligible to reapply for a physician's and surgeon's
22 certificate for a minimum of three years from the effective date of the denial of his or
her application, except that the board may, in its discretion and for good cause
23 demonstrated, permit reapplication after not less than one year has elapsed from the
effective date of the denial.

24 (e) The board shall disclose a probationary physician's and surgeon's certificate
25 issued pursuant to this section and the operative statement of issues to an inquiring
member of the public and shall post the certificate and statement on the board's
26 internet website for 10 years from issuance.

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1 7. Section 2234 of the Code, states:

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

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

7 (b) Gross negligence.

8 (c) Repeated negligent acts. To be repeated, there must be two or more
9 negligent acts or omissions. An initial negligent act or omission followed by a
10 separate and distinct departure from the applicable standard of care shall constitute
11 repeated negligent acts.

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

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

20 (d) Incompetence.

21 (e) The commission of any act involving dishonesty or corruption that is
22 substantially related to the qualifications, functions, or duties of a physician and
23 surgeon.

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

25 (g) The failure by a certificate holder, in the absence of good cause, to attend
26 and participate in an interview by the board no later than 30 calendar days after being
27 notified by the board. This subdivision shall only apply to a certificate holder who is
28 the subject of an investigation by the board.

 (h) Any action of the licensee, or another person acting on behalf of the
licensee, intended to cause their patient or their patient's authorized representative to
rescind consent to release the patient's medical records to the board or the
Department of Consumer Affairs, Health Quality Investigation Unit.

 (i) Dissuading, intimidating, or tampering with a patient, witness, or any person
in an attempt to prevent them from reporting or testifying about a licensee.

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1 8. Unprofessional conduct under Business and Professions Code section 2234 is conduct
2 which breaches the rules or ethical code of the medical profession, or conduct which is
3 unbecoming a member in good standing of the medical profession, and which demonstrates an
4 unfitness to practice medicine. (*Shea v. Board of Medical Examiners* (1978) 81 Cal.App.3d 564,
5 575.)

6 9. Section 2234 of the Code requires the Board to take action against any licensee
7 charged with unprofessional conduct.

8 **FIRST CAUSE FOR DENIAL OF APPLICATION**

9 **(Incompetence)**

10 10. Applicant's application is subject to denial under section 475, subdivision (a)(4), and
11 section 2234, subdivision (d), of the Code, in that Applicant demonstrated incompetence, as more
12 particularly alleged hereinafter:

13 11. Between on or about September 1, 1995 through September 1, 2002, Applicant
14 completed her undergraduate medical school education in a foreign country.

15 12. On or about February 25, 2016, Applicant passed USMLE¹ Step 1 Examination² on
16 her first attempt with a score of 201. A passing score was 192 or higher.

17 13. On or about June 6, 2018, Applicant failed USMLE Step 2 CK Examination³ on her
18 first attempt with a score of 200. A passing score was 209 or higher.

19 14. On or about July 13, 2018, Applicant passed USMLE Step 2 CS examination⁴ on her
20 first attempt.

21 _____
22 ¹ The United States Medical Licensing Examination (USMLE) is a three-step examination
for medical licensure in the United States of America.

23 ² Step 1 of the USMLE examination assesses whether an examinee understands and can
24 apply important concepts of the sciences basic to the practice of medicine, with special emphasis
on principles and mechanisms underlying health, disease, and modes of therapy.

25 ³ USMLE Step 2 CK assesses an examinee's ability to apply medical knowledge, skills,
26 and understanding of clinical science essential for the provision of patient care under supervision
and includes emphasis on health promotion and disease prevention.

27 ⁴ USMLE Step 2 CS (Clinical Skills) exam was on hold starting May 2020, and has now
28 been canceled permanently.

1 15. On or about September 30, 2020, Applicant passed USMLE Step 2 CK Examination
2 on her second attempt with a score of 229. A passing score was 209 or higher.

3 16. On or about June 2, 2021, Applicant passed USMLE Step 3 Examination⁵ on her first
4 attempt with a score of 214. A passing score was 198.

5 17. From on or about July 1, 2021 through June 30, 2022, Applicant completed PGY 1⁶
6 resident year in Livingston, New Jersey. Applicant's mid-year and year-end summary
7 evaluations rated Applicant at Level 1, the lowest possible rating, for all twenty-seven (27)
8 milestones in pathology.⁷ Comments from Applicant's end of year summary evaluation from
9 Applicant's program director include, "Dr. Jaladat [Applicant] has not performed well. She is not
10 a team player. Does not follow up on cases. Attendance is a big issue. Pathology knowledge is
11 far below expected first year level at this point." A comment from Applicant's multisource / 360
12 evaluation⁸ states, "She [Applicant] is sometimes overbearing and can be rude and argumentative.
13 Needs to improve how she interacts with staff."

14 18. On or about August 1, 2022, Applicant transferred to a Residency Program in Loma
15 Linda, California, as a PGY 2 resident. A milestone summary evaluation during Applicant's first
16 six (6) months included comments such as, "Yasaman [Applicant] is below the expected level of
17 a PGY 2 regarding clinical pathologic correlation, accurate diagnoses, and accurate reporting of
18 findings." Another comment reads, "Based upon several issues encountered upon [Applicant's]
19 arrival at our training program, it was quickly apparent that she [Applicant] was not prepared to
20 function as a PGY 2 . . . Based upon these issues a performance improvement plan (PIP) was
21 initiated . . . there were interpersonal communication and professionalism issues that have also

22 ⁵ USMLE Step 3 assesses whether an examinee can apply medical knowledge and
23 understanding of biomedical and clinical science essential for the unsupervised practice of
24 medicine.

25 ⁶ PGY stands for postgraduate year. PGY 1 is the first year of postgraduate year of
training.

26 ⁷ Pathology is a branch of medical science that is focused on the study and diagnosis of
27 disease.

28 ⁸ Multisource feedback (MSF); also called 360-degree assessment, is one form of
assessment used in postgraduate training.

1 been addressed.” Another comment reads, “Subsequently a serious mistake pertaining to the
2 independent handling of partial mastectomy and additional margins was made by Dr. Jaladat
3 [Applicant], leading to further concern over her safety in performing tasks independently.” After
4 six (6) months, Applicant completed the PIP, but concerns remained. A comment from a faculty
5 member states, “While Yasaman [Applicant] showed some interval improvement upon
6 completion of her performance improvement plan, upon return to the non-modified rotation,
7 additional errors and significant events occurred . . . demonstrating very poor clinical judgment /
8 reasoning. As such, there remains serious concern for patient safety in the absence of an increased
9 level of supervision than what is expected for her level.”

10 19. On or about January 17, 2023, Applicant was placed on academic probation for
11 deficiencies in patient care, medical knowledge, practiced-based learning and improvement, and
12 professionalism. Specifically, Applicant’s primary areas of deficiency were as follows:

- 13 a. An inadequate fund of knowledge with regard to fundamental concepts in
14 surgical pathology, both in terms of gross pathology⁹ and histopathology,¹⁰ as well as
15 hematopathology,¹¹ and blood banking¹²;
- 16 b. Inaccurate interpretations of normal and abnormal histology¹³;
- 17 c. 5th percentile score on the pathology Resident In-Service Exam (RISE)¹⁴;

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20 ⁹ Gross pathology refers to macroscopic assessment of disease in organs, tissues, and body
cavities.

21 ¹⁰ Histopathology is the diagnosis and study of diseases of the tissues, and involves
22 examining tissues and or cells under a microscope.

23 ¹¹ Hematopathology refers to study of diseases of the cells that make up our blood.

24 ¹² Blood banking is the process that takes place in the lab to make sure that the donated
25 blood, or blood products, are safe before they are used in blood transfusions and other medical
procedures.

26 ¹³ Histology is the study of the microanatomy of cells, tissues, and organs as seen through
a microscope.

27 ¹⁴ Resident in-Service Examination (RISE) is an evaluation tool that can be used to assess
28 progress in Anatomic Pathology, Clinical Pathology, Molecular Pathology, and Laboratory
Administration.

1 d. The lowest observed score by a resident on the pre-test knowledge assessment
2 for blood banking;

3 e. An inability to use sound judgment to independently assess clinical situations
4 and formulate appropriate plans for creating a comprehensive pathology report;

5 f. An inability to recognize the gap between your perceived performance with
6 actual performance and demonstrate appropriate insight in addition to not fully addressing a
7 way to narrow these gaps;

8 g. Inconsistently taking responsibility for lapses and/or errors.

9 20. Applicant's academic probation described in paragraph 19, above, included a seven-
10 step plan of correction with specific goals and remediation plans, including meeting every two (2)
11 weeks with Applicant's program director to receive specific feedback.

12 21. On or about May 15, 2023, the Clinical Competence Committee, responsible for
13 assessing Applicant's progress and lifting of Applicant's academic probation, described in
14 paragraph 19, above, met in a meeting and cited multiple concerns regarding Applicant's
15 performance. The comments from the Clinical Competence Committee's May 15, 2023 meeting
16 include:

17 a. Yasaman [Applicant] has made some technical improvements but is still not at
18 the expected level of training. She remains significantly behind in medical and diagnostic
19 knowledge. Yasaman depends on instruction from those around her, rather than learning
20 from references, and she continues to struggle with implementation of information and
21 feedback, as well as in fund of knowledge and recognition and workup of pathologic
22 processes.

23 b. Very weak in Practice-based learning. Poor memory / retention so time wasted
24 repeating many items repeatedly. Needs much supervision and teaching compared to PGY
25 I residents;

26 c. Yasaman [Applicant] has shown improvement in a few areas, but major
27 concerns persist on anatomic pathology rotations. RISE [Resident In-Service Exam]
28 scores need substantial improvement, and do not show positive trajectory in medical

1 knowledge; and

2 d. The committee remains concerned about her [Applicant's] poor performance in
3 multiple competencies, particularly within anatomic pathology. If the slope of
4 improvement does not increase significantly, it is difficult to see how she can attain
5 competence in anatomic pathology by a reasonable length of additional training.

6 22. On or about June 1, 2023, Applicant was removed from academic probation described
7 in paragraph 19, above.

8 23. On or about March 6, 2023, Applicant submitted an application for a Transition from
9 Postgraduate Training License to a Physician's and Surgeon's License (Application) to the Board.
10 As part of the Application, Respondent certified under penalty of perjury to the truthfulness of all
11 statements, answers, and representations in the application.

12 24. One of the questions in the Application states, "Since the date you submitted your
13 PTL application have you ever been placed on probation for any reason?" Applicant replied
14 "No," even though she knew that this was false.

15 25. Another question in the Application states, "Since the date you submitted your
16 application for a PTL have you ever had any limitations or special requirements placed upon you
17 for clinical performance, professionalism, medical knowledge, discipline, or for any other reason,
18 which may include, but is not limited to, a corrective action plan, performance improvement plan,
19 remediation plan, individual development plan, and any type of informal or progressive
20 disciplinary or non-disciplinary action?" Applicant replied "No," even though she knew that this
21 was false.

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1 **SECOND CAUSE FOR DENIAL OF APPLICATION**

2 **(Dishonesty, Fraud or Deceit and/or Dishonest or Corrupt Act)**

3 26. Applicant's application is subject to denial under section 475, subdivisions (a)(3) and
4 (a)(4), and section 2234, subdivision (e), of the Code, in that Applicant committed act(s)
5 involving dishonesty, fraud or deceit with the intent to substantially benefit herself and/or
6 committed dishonest or corrupt act(s) that is substantially related to the qualifications, functions,
7 or duties of a physician and surgeon, as more particularly alleged hereinafter:

8 27. Paragraphs 10 through 25, above, are hereby incorporated by reference and realleged
9 as if fully set forth herein.

10 **THIRD CAUSE FOR DENIAL OF APPLICATION**

11 **(False Statement(s) of Fact in the Application)**

12 28. Applicant's application is subject to denial under section 475, subdivision (a)(1), and
13 section 480, subdivision (e), of the Code, in that Applicant knowingly made false statement(s) of
14 material fact(s) that is required to be revealed in the application for the physician's and surgeon's
15 license, as more particularly alleged hereinafter:

16 29. Paragraphs 10 through 25, above, are hereby incorporated by reference and realleged
17 as if fully set forth herein.

18 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

19 **(Unprofessional Conduct)**

20 30. Applicant's application for a physician's and surgeon's certificate is subject to
21 denial under section 2221, subdivision (a) (license may be denied for unprofessional conduct),
22 and section 2234 (general unprofessional conduct), of the Code, for unprofessional conduct as
23 demonstrated by Applicant's false statement of material facts in the Application and/or dishonest
24 / corrupt act(s) and/or incompetence, as described in paragraphs 10 through 29, above.

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1 PRAYER

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

- 4 1. Denying the application of Applicant Yasaman Jaladat, PTL, for a physician's and
5 surgeon's license certificate;
- 6 2. If issued a probationary license, ordering Applicant Yasaman Jaladat, PTL, to pay the
7 Board the costs of probation monitoring;
- 8 3. If placed on probation, revoking, suspending, or denying the approval of Applicant
9 Yasaman Jaladat, PTL, to supervise physician assistants and advanced practice nurses; and
- 10 4. Taking such other and further action as deemed necessary and proper.

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12 DATED: JUN 20 2024

13 
14 REJI VARGHESE
15 Executive Director
16 Medical Board of California
17 Department of Consumer Affairs
18 State of California
19 Complainant