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

In the Matter of the	Accusation Against:
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Reno K. Ahuja, M.D.

Physician's & Surgeon's Certificate No. C 141861

Respondent.

Case No. 800-2021-081475

#### **DECISION**

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on March 3, 2025.

IT IS SO ORDERED: January 31, 2025.

MEDICAL BOARD OF CALIFORNIA

Michelle A. Bholat, MD

Michelle Anne Bholat, M.D., Chair Panel A

1	ROB BONTA							
2	Attorney General of California MACHAELA M. MINGARDI	•						
3	Supervising Deputy Attorney General C. HAY-MIE CHO							
4	Deputy Attorney General State Bar No. 282259							
5	455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102-7004							
6	Telephone: (415) 510-4433 Facsimile: (415) 703-5480							
7	E-mail: Haymie.Cho@doj.ca.gov  Attorneys for Complainant							
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9	BEFORE THE MEDICAL BOARD OF CALIFORNIA							
10	DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA							
11	In the Matter of the Accusation Against:	Case No. 800-2021-081475						
	RENO K. AHUJA, M.D.	OAH No. 2024100283						
12	1435 Bradford Lane							
13	Carbondale, IL 62902-6237	STIPULATED SETTLEMENT AND DISCIPLINARY ORDER						
14	Physician's and Surgeon's Certificate No. C 141861,							
15	Respondent.							
16								
17	· ·	<b>REED</b> by and between the parties to the above-						
18	entitled proceedings that the following matters are							
19	PART	<u>ries</u>						
20	1. Reji Varghese (Complainant) is the Executive Director of the Medical Board of							
21	California (Board). He brought this action solely in his official capacity and is represented in this							
22	matter by Rob Bonta, Attorney General of the State of California, by C. Hay-Mie Cho, Deputy							
23	Attorney General.							
24	2. Respondent Reno K. Ahuja, M.D. (Re	espondent) is represented in this proceeding by						
25	attorney Raymond J. McMahon, Esq., 5440 Trabi	uco Road, Irvine, CA 92620.						
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3. On April 12, 2016, the Board issued Physician's and Surgeon's Certificate No. C 141861 to Reno K. Ahuja, M.D. (Respondent). That license was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2021-081475, and will expire on June 30, 2025, unless renewed.

#### <u>JURISDICTION</u>

- 4. Accusation No. 800-2021-081475 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 April 18, 2024. Respondent timely filed a Notice of Defense contesting the Accusation.
- 5. A copy of Accusation No. 800-2021-081475 is attached as Exhibit A and is incorporated herein by reference.

#### ADVISEMENT AND WAIVERS

- 6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2021-081475. Respondent has also carefully read, fully discussed with her counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.
- 7. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the 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.
- 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

#### **CULPABILITY**

9. Respondent understands and agrees that the charges and allegations in Accusation No. 800-2021-081475, if proven at a hearing, constitute cause for imposing discipline upon her Physician's and Surgeon's Certificate.

- 10. Respondent does not contest that, at an administrative hearing, complainant could establish a prima facie case with respect to the charges and allegations in Accusation No. 800-2021-081475, a copy of which is attached hereto as Exhibit A, and that she has thereby subjected her Physician's and Surgeon's Certificate No. C 141861 to disciplinary action.
- 11. Respondent agrees that her Physician's and Surgeon's Certificate is subject to discipline, and she agrees to be bound by the Board's terms as set forth in the Disciplinary Order below.

#### **CONTINGENCY**

- 12. This stipulation shall be subject to approval by the Medical Board of California. Respondent understands and agrees that counsel for Complainant and the staff of the Medical Board of California may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.
- 13. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.
- 14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or opportunity to be heard by Respondent, issue and enter the following Disciplinary Order:

#### DISCIPLINARY ORDER

#### A: PUBLIC REPRIMAND

IT IS HEREBY ORDERED THAT Physician's and Surgeon's Certificate No. C 141861, issued to Respondent shall be and is hereby publicly reprimanded pursuant to California Business

and Professions Code section 2227, subdivision (a)(4). This public reprimand is issued because Respondent was disciplined by the Illinois Department of Financial and Professional Regulation for prescribing while maintaining her DEA license but failing to review her Illinois Controlled Substance License and for her failure to meet the standard of care in her treatment of a psychiatric patient, as set forth in Accusation No. 800-2021-081475.

#### **B: REMEDIAL EDUCATION**

1. PROFESSIONALISM PROGRAM (ETHICS COURSE). Respondent is ordered to complete a Professionalism Program (Ethics Course) within one year of the effective date of this Decision. Within 60 calendar days of the effective date of this Decision, Respondent shall enroll in a professionalism program, that meets the requirements of Title 16, California Code of Regulations (CCR) section 1358.1. Respondent shall participate in and successfully complete that program. Respondent shall provide any information and documents that the program may deem pertinent. Respondent shall successfully complete the classroom component of the program not later than six (6) months after Respondent's initial enrollment, and the longitudinal component of the program not later than the time specified by the program, but no later than one (1) year after attending the classroom component. The professionalism program shall be at Respondent's expense and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

A professionalism program taken after the acts that gave rise to the charges in the Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board or its designee, be accepted towards the fulfillment of this condition if the program would have been approved by the Board or its designee had the program been taken after the effective date of this Decision.

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

Failure to timely complete the Professionalism Program shall constitute unprofessional conduct in violation of Business and Professions Code section 2234 and may subject Respondent

to further disciplinary action. 1 C: COST RECOVERY 2 Respondent is hereby ordered to reimburse the Board its costs of investigation and 3 enforcement in the amount of \$10,636.31.1 Costs shall be payable to the Medical Board of 4 California. Failure to pay such costs shall be considered unprofessional conduct in violation of 5 Business and Professions Code section 2234 and may subject Respondent to further disciplinary 6 action. 7 **D: FUTURE ADMISSIONS CLAUSE** 8 If Respondent should ever apply or reapply for a new license or certification, or petition for 9 reinstatement of a license, by any other health care licensing action agency in the State of 10 California, all of the charges and allegations contained in Accusation No. 800-2021-081475 shall 11 be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of 12 Issues or any other proceeding seeking to deny or restrict license. 13 **ACCEPTANCE** 14 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully 15 discussed it with my attorney, Raymond J. McMahon, Esq. I understand the stipulation and the 16 17 effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated 18 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be 19 bound by the Decision and Order of the Medical Board of California. 20 12/20/24 DATED: 21 RENOK, AHUJA, M.D 22 Respondent 23 // 24 // 25 //

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<sup>&</sup>lt;sup>1</sup> This amount represents a 25% reduction and is subject to change, due to the pending nature of this matter.

1	1	read and fully di								,
2	*	nd other matters		in the ab	ove Stipu	lated Settlem	ient and D	isciplina	iry Ord	ier.
3	DATED:	form and content 12/20/2024	ı <b>.</b> .		7/1	and				
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## **ENDORSEMENT** The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California. DATED: December 20, 2024 Respectfully submitted, ROB BONTA Attorney General of California MACHAELA M. MINGARDI Supervising Deputy Attorney General C. HAY-MIE CHO Deputy Attorney General Attorneys for Complainant SF2024400807 44447184.docx

# Exhibit A Accusation No. 800-2021-081475

1 2 3 4 5 6	ROB BONTA Attorney General of California GREG W. CHAMBERS Supervising Deputy Attorney General State Bar No. 237509 455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102-7004 Telephone: (415) 510-3382 Facsimile: (415) 703-5480 Attorneys for Complainant					
7	BEFOR					
8	MEDICAL BOARD DEPARTMENT OF C	ONSUMER AFFAIRS				
9	STATE OF C.	ALIFORNIA				
10						
11	In the Matter of the Accusation Against:	Case No. 800-2021-081475				
12	Reno K. Ahuja, M.D. 1435 Bradford Ln.	ACCUSATION				
13	Carbondale, IL 62902-6237					
14	Physician's and Surgeon's Certificate No. C 141861,					
15	Respondent.					
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18	PAR	<del></del>				
19	Reji Varghese (Complainant) brings t	his Accusation solely in his official capacity as				
20	the Executive Director of the Medical Board of C	alifornia, Department of Consumer Affairs				
21	(Board).					
22	2. On or about April 12, 2016, the Medical Board issued Physician's and Surgeon's					
23	Certificate Number C 141861 to Reno K. Ahuja, M.D. (Respondent). The Physician's and					
24	Surgeon's Certificate was in full force and effect at all times relevant to the charges brought					
25	herein and will expire on June 30, 2025, unless renewed.					
26	<i>III</i>					
27	m e e e e e e e e e e e e e e e e e e e					
28	///					
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	(RENO K.	AHUJA, M.D.) ACCUSATION NO. 800-2021-081475				

#### **JURISDICTION**

- 3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.
  - 4. Section 141 of the Code states:
- (a) For any licensee holding a license issued by a board under the jurisdiction of the department, a disciplinary action taken by another state, by any agency of the federal government, or by another country for any act substantially related to the practice regulated by the California license, may be a ground for disciplinary action by the respective state licensing board. A certified copy of the record of the disciplinary action taken against the licensee by another state, an agency of the federal government, or another country shall be conclusive evidence of the events related therein.
- (b) Nothing in this section shall preclude a board from applying a specific statutory provision in the licensing act administered by that board that provides for discipline based upon a disciplinary action taken against the licensee by another state, an agency of the federal government, or another country.
- 5. Section 2227 of the Code provides that a licensee who is found guilty under the Medical Practice Act may have his or her license revoked, suspended for a period not to exceed one year, placed on probation and required to pay the costs of probation monitoring, or such other action taken in relation to discipline as the Board deems proper.
  - 6. Section 2305 of the Code states:

The revocation, suspension, or other discipline, restriction or limitation imposed by another state upon a license or certificate to practice medicine issued by that state, or the revocation, suspension, or restriction of the authority to practice medicine by any agency of the federal government, that would have been grounds for discipline in California of a licensee under this chapter [Chapter 5, the Medical Practice Act] shall constitute grounds for disciplinary action for unprofessional conduct against the licensee in this state.

#### COST RECOVERY

7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to 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, with failure of the licensee to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

#### FACTUAL ALLEGATIONS

8. On or about August 23, 2021, the Illinois Department of Financial and Professional Regulation (IDFPR) issued a Consent Order in Case No. 2017-02069, subsequent to allegations Respondent prescribed controlled substances without renewing her Illinois Controlled Substance License; and failed to appropriately evaluate and treat a patient of her practice while the patient was experiencing an acute psychiatric episode. Under the terms of the Consent Order, Respondent was placed on indefinite probation for a minimum of one (1) year; required to have a practice monitor; and pay a fine, among other terms and conditions. A copy of the Consent Order is attached hereto as Exhibit 1.

#### **CAUSE FOR DISCIPLINE**

### (Discipline, Restriction, or Limitation Imposed by Another State)

- 9. Paragraph 8 is incorporated by reference as if fully set forth.
- 10. Respondent Reno K. Ahuja, M.D., is subject to disciplinary action under sections 141 and 2305 of the Code in that the action taken by IDFPR, by and through its Consent Order, regarding Respondent's Illinois license to practice medicine, as set forth above, constitutes cause for disciplinary action and/or unprofessional conduct within the meaning of sections 141 and 2305 of the Code. Therefore, cause for discipline exists.

#### PRAYER

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

(RENO K. AHUJA, M.D.) ACCUSATION NO. 800-2021-081475

## EXHIBIT 1

#### STATE OF ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION DIVISION OF PROFESSIONAL REGULATION

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION		<b>)</b>
of the State of Illinois.	Complainant,	)
V.		) No. 2017-02069
Reno Ahuja, M.D.,		)
License No. 036-128348,	Respondent.	3

#### CONSENT ORDER

The Department of Financial and Professional Regulation, Division of Professional Regulation, of the State of Illinois, by Vladimir Lozovskiy, one of its attorneys. (hereinafter the "Department") and Reno Ahuja, M.D. (hereinafter the "Respondent"), through Scott D. Hammer, her attorney, hereby agree to the following:

#### STIPULATIONS

Reno Ahuja, M.D. is licensed as a Physician and Surgeon in the State of Illinois, holding. Illinois Physician and Surgeon License No. 036-128348. Said license is in Active status. At all times material to the matter(s) set forth in this Consent Order, the Department of Financial and Professional Regulation, Division of Professional Regulation, of the State of Illinois had jurisdiction over the subject matter and parties herein.

Information has come to the attention of the Department that alleges that Respondent prescribed Controlled Substances without renewing her Illinois Controlled Substance License. While this matter was pending, the Department also received information that Respondent failed to appropriately evaluate and treat a patient of her practice while the patient was experiencing acute psychiatric cpisode. The allegation(s) as set forth herein, if proven to be true, would constitute grounds for suspending, revoking or other discipline of Respondent's license as a

Physician and Surgeon, on the authority 325 Illinois Compiled Statutes, Paragraph 60/22(A)(5) and (33).

Subsequently, the Department held an informal conference in this matter on November 6,2019. Karen O'Mara, D.O. and Shami Goval. M.D. were present on behalf of the Medical Disciplinary Board and Vladimir Lozovskiy, regular staff attorney, appeared on behalf of the Department. Respondent appeared along with her attorney Scott D. Hammer. During informal conference, Respondent provided information regarding her educational background and experience and explained the issues that led to her failure to renew Illinois Controlled Substance License. In addition, Respondent described her care, treatment and evaluation of the patient-inquestion.

For purposes of this Consent Order, Respondent neither admits nor denies the allegations, but she acknowledges that should this matter proceed to a contested hearing, the Illinois Medical Disciplinary Board (the "Board") could find a violation of the Medical Practice Act. Respondent has been advised of the right to a hearing, the right to contest any charges brought, and the right to administrative review of this Consent Order. Respondent knowingly waives each of these rights. Such waiver ceases if this Consent Order is rejected by either the Medical Disciplinary Board or the Director of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation.

Respondent and the Department have agreed, in order to resolve this matter, that Respondent, Reno Ahuja, M.D., be permitted to enter into a Consent Order with the Department, providing for the imposition of disciplinary measures which are that and equitable under the circumstances and which are consistent with the best interests of the people of the State of Illinois.

#### CONDITIONS

WHEREFORE, the Department, through Vladimir Lozovskiy, its regular staff attorney, and Reno Ahuja, M.D., Respondent, through Scott D. Hammer, her attorney, agree:

A. Illinois Physician and Surgeon License of Reno Ahuja, M.D., License No. 036-128348, is hereby placed on indefinite probation for minimum of one (1) year; B. During a period of Probation, Respondent shall provide the Department with quarterly reports which include: (i) current residential address and contact telephone number as well as current practice location address and contact telephone number; (ii) address and contact information for each healthcare entity where Respondent has admitting privileges and/or employed; (iii) names of all the subordinates that are employed and/or supervised by Respondent during the reporting quarter; (iv) description of job duties, responsibilities and name of immediate supervisor and/or Department's Chairperson; (v) copy of any and all incident reports within the prior quarter filled against Respondent; and (vi) information, regarding any arrests, criminal, or civil actions filed, including DUI and/or other similar offenses against the Respondent; (vii) Respondent shall notify the Bepartment of any adverse action taken against her related to the practice of medicine by another entity including but not limited to licensing authorities, insurance companies, and state and federal agencies, within ten (10) days of said adverse action; and (viii) Respondent shall notify the Department when she is the subject of any investigation initiated by another entity, including but not limited to licensing authorities, insurance companies, and state and federal agencies, within ten (10) days of said investigation; C. During a period of Probation. Respondent shall notify the Department's Chief of Probation Investigations in writing of any change in employment and/or home address and/or telephone number within ten (10) days;

- D. During a period of Probation, Respondent shall request the designated person from every healthcare entity, where she is practicing medicine/utilizing her Physician and Surgeon License, to submit quarterly reports to the Department regarding any issues arising out of her employment and practice of medicine:
- E. Within 60 days of the final approval of this Consent Order, Respondent shall obtain a practice monitor, who is a licensed Physician and Surgeon in the State of Illinois. Said practice monitor cannot be affiliated with Respondent's practice. Said practice monitor shall have an unrestricted Illinois Physician and Surgeon License that has never been disciplined by any state and/or federal agencies. The practice monitor shall be hired at the expense of Respondent and shall be pre-approved by the Chief Medical Coordinator of the Department. Respondent shall request that her practice monitor submit quarterly reports about scope and performance appraisals. On a quarterly basis the practice monitor shall meet with Respondent and randomly select and review ten (10) charts of patients who have been seen by Respondent during the quarter. The practice monitor shall review the charts of those patients and submit independent quarterly reports to the Department evaluating the scope, appropriateness, and quality of medical care rendered by Respondent;
- F. During a period of Probation, the practice monitor shall agree to inform the Department immediately if there is evidence of inappropriate behavior, professional misconduct, a violation of Respondent's probation or any violation of the laws and rules governing the practice of medicine:
- G. During a period of Probation. Respondent shall notify the Department's Probation Unit within 10 (ten) days should her relationship with any practice monitor cease. Respondent

shall submit to the Department's Chief Medical Coordinator a name of a new practice monitor within 30 days from the date of the initial Notice:

- H. Respondent is required to submit a proof of completion of ten (10) Category I

  CMBs in the area of psychiatric emergencies and ten (10) Category I CMEs in the area of
  professional responsibility. Said CME credits are not allowed to be counted towards
  regularly required CME credits pursuant to the Illinois Medical Practice Act;
- L. Respondent shall pay a Fine in the amount of \$5,000.00 (five thousand dollars) being due within twelve (12) months of the effective date of this Consent Order.

  Respondent shall submit a check payable to: the Illinois Department of Financial and Professional Regulation. Said fine shall be mailed to Illinois Dept. of Financial and Professional Regulation, Attention: CMU/Accounts Receivable Fine Payments, 320 W. Washington St., 3<sup>rd</sup> Floor, Springfield, Illinois 62786;
- J. Respondent shall ensure that all the reports required to be submitted under the terms of this Probation shall be filed with the Department no later than 1/10, 4/10, 7/10 and 10/10 of each year during the full term of the Probation:
- K. Respondent agrees that a violation of the terms and conditions of this Consent Order or a violation of the terms of probation is a violation of 225 ILCS 60/22(A)(15);
- L. Respondent shall not violate the Illinois Medical Practice Act of 1987, any other federal and state laws related to the practice of medicine as well as any other federal and state laws;
- M. If Respondent violates any of the terms and conditions of this Order, the Director of the Division of Professional Regulation may issue an Order forthwith mandating the automatic, immediate, indefinite suspension of Respondent's Illinois Physician License for a minimum of twelve (12) months. This indefinite suspension shall not

preclude the Department from taking any other disciplinary or other actions it deems appropriate. In the event Respondent contests in writing (by the filing of an appropriate petition with the Department) the factual basis underlying said indefinite suspension within thirty (30) days of the imposition thereof, then Respondent shall be afforded a hearing on the merits within thirty (30) days from filing of said petition;

N. This Consent Order shall become effective immediately after it is approved by the Director of the Division of Professional Regulation of the illinois Department of

7/13/2021 DATE	Vladimir Lozovskiy, Attorney for the Department			
7/8/2021 DATE	Reno Ahuja, M.D., Respondent			
7/8/2/ DATE	Scott D. Hammer, Attorney for Respondent			
7/21/2021 DATE	Member, Medical Disciplinary Board			

Pinancial and Professional Regulation.

The foregoing C	onsent Order is	approved in	i full.		
DATES THIS _	<u>23rd</u> d	ay of	August	2021.	
,		PROF the St	ESSIONAL RE	PINANCIAL AND GULATION of Iario Treto, Jr., Ac al Regulations	ting Socretary
		Cecilia	Abundis Director	Jan-	

REF: Case No. 2017-02069/ License No. 036-128348