

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

In the Matter of the Accusation Against:

Tannaz Ebrahimi Adib, M.D.

Physician's and Surgeon's
Certificate No. A 121761

Respondent.

MBC File # 800-2021-077150

**ORDER CORRECTING NUNC PRO TUNC CLERICAL ERROR
IN RESPONDENT'S NAME IN DECISION AND STIPULATION**

On its own motion, the Medical Board of California (hereafter "Board") finds that there is a clerical error in the respondent's name in the Decision and Stipulated Surrender of License and Disciplinary Order in the above-titled matter and that such clerical error should be corrected so that the name will conform to the Board's issued license.

IT IS HEREBY ORDERED that the respondent's name contained on the Decision Order Page in the above-titled matter be and hereby is amended and corrected nunc pro tunc as of the date of entry of the decision to read as "Tannaz Ebrahimi Adib."

January 31, 2025



Reji Varghese,
Executive Director

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

In the Matter of the Accusation Against:

Tannaz Adib Ebrahimi, M.D.

**Physician's and Surgeon's
Certificate No. A 121761**

Respondent.

Case No. 800-2021-077150

DECISION

The attached Stipulated Surrender of License 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 January 31, 2025.

IT IS SO ORDERED January 24, 2025.

MEDICAL BOARD OF CALIFORNIA



**Reji Varghese
Executive Director**

1 ROB BONTA
Attorney General of California
2 ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
3 CHRISTINE A. RHEE
Deputy Attorney General
4 State Bar No. 295656
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
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7 Facsimile: (619) 645-2061

8 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:

Case No. 800-2021-077150

14 **TANNAZ ADIB EBRAHIMI, M.D.**
15 **3927 Waring Rd., Ste. D**
Oceanside, CA 92056-4458

OAH No. 2024060912

**STIPULATED SURRENDER OF
LICENSE AND DISCIPLINARY ORDER**

16 **Physician's and Surgeon's Certificate**
17 **No. A 121761,**

Respondent.

18
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 Christine A. Rhee, Deputy
26 Attorney General.

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2. Tannaz Adib Ebrahimi, M.D. (Respondent), is represented in this proceeding by attorneys Peter R. Osinoff, Esq., and Derek F. O'Reilly-Jones, Esq., whose address is: 355 South Grand Ave., Ste. 1750, Los Angeles, CA 90071-5162.

3. On or about June 20, 2012, the Board issued Physician's and Surgeon's Certificate No. A 121761 to Respondent. That license was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2021-077150 and will expire on November 30, 2025, unless renewed.

JURISDICTION

4. Accusation No. 800-2021-077150 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 25, 2024. Respondent timely filed her Notice of Defense contesting the Accusation. A true and correct copy of Accusation No. 800-2021-077150 is attached as Exhibit A and incorporated by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2021-077150. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Having the benefit of counsel, Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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1 **CULPABILITY**

2 8. Respondent admits that, at an administrative hearing, Complainant could establish a
3 prima facie case with respect to the charges and allegations contained in Accusation No. 800-
4 2021-077150, agrees that she has thereby subjected her Physician's and Surgeon's Certificate
5 No. A 121761 to disciplinary action, and hereby surrenders her Physician's and Surgeon's
6 Certificate No. A 121761 for the Board's formal acceptance.

7 9. Respondent understands that by signing this stipulation she enables the Board to issue
8 an order accepting the surrender of her Physician's and Surgeon's Certificate without further
9 process.

10 **CONTINGENCY**

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

14 11. Respondent understands that, by signing this stipulation, she enables the Executive
15 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of her
16 Physician's and Surgeon's Certificate No. A 121761 without further notice to, or opportunity to be
17 heard by, Respondent.

18 12. This Stipulated Surrender of License and Disciplinary Order shall be subject to the
19 approval of the Executive Director on behalf of the Board. The parties agree that this Stipulated
20 Surrender of License and Disciplinary Order shall be submitted to the Executive Director for his
21 consideration in the above-entitled matter and, further, that the Executive Director shall have a
22 reasonable period of time in which to consider and act on this Stipulated Surrender of License and
23 Disciplinary Order after receiving it. By signing this stipulation, Respondent fully understands
24 and agrees that she may not withdraw her agreement or seek to rescind this stipulation prior to the
25 time the Executive Director, on behalf of the Medical Board, considers and acts upon it.

26 13. The parties agree that this Stipulated Surrender of License and Disciplinary Order
27 shall be null and void and not binding upon the parties unless approved and adopted by the
28 Executive Director on behalf of the Board, except for this paragraph, which shall remain in full

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

16 **ADDITIONAL PROVISIONS**

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

20 15. The parties agree that copies of this Stipulated Surrender of License and Disciplinary
21 Order, including copies of the signatures of the parties, may be used in lieu of original documents
22 and signatures and, further, that such copies shall have the same force and effect as originals.

23 16. In consideration of the foregoing admissions and stipulations, the parties agree the
24 Executive Director of the Board may, without further notice to or opportunity to be heard by
25 Respondent, issue and enter the following Disciplinary Order on behalf of the Board:

26 **DISCIPLINARY ORDER**

27 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 121761,
28 issued to Respondent Tannaz Adib Ebrahimi, M.D., is surrendered and accepted by the Board.

1. The surrender of Respondent's Physician's and Surgeon's Certificate and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.

2. Respondent shall lose all rights and privileges as a Physician and Surgeon in California as of the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board her pocket license and, if one was issued, her wall certificate on or before the effective date of the Decision and Order.

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked or surrendered license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 800-2021-077150 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. Respondent shall pay the agency its costs of investigation and enforcement in the amount of \$18,574.00 prior to issuance of a new or reinstated license.

6. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 800-2021-077150 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

ACCEPTANCE

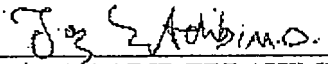
I have carefully read the above Stipulated Surrender of License and Disciplinary Order and have fully discussed it with my attorneys Peter R. Osinoff, Esq., and Derek F. O'Reilly-Jones, Esq. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of License and Disciplinary Order voluntarily,

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///

1 knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical
2 Board of California.

3
4 DATED: 01-08-25


TANNAZ ADIB EBRAHIMI, M.D.
Respondent

6 I have read and fully discussed with Respondent Tannaz Adib Ebrahimi, M.D., the terms
7 and conditions and other matters contained in this Stipulated Surrender of License and
8 Disciplinary Order. I approve its form and content.

9
10 DATED: 01/08/2025


PETER R. OSINOFF, ESQ.
DEREK F. O'REILLY-JONES, ESQ.
Attorneys for Respondent

12
13 **ENDORSEMENT**

14 The foregoing Stipulated Surrender of License and Disciplinary Order is hereby
15 respectfully submitted for consideration by the Medical Board of California of the Department of
16 Consumer Affairs.

17 DATED: _____

Respectfully submitted,

18 ROB BONTA
19 Attorney General of California
20 ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General

21
22 CHRISTINE A. REBE
23 Deputy Attorney General
24 Attorneys for Complainant

25
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1 knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical
2 Board of California.

3
4 DATED: _____
5 TANNAZ ADIB EBRAHIMI, M.D.
6 Respondent

7 I have read and fully discussed with Respondent Tannaz Adib Ebrahimi, M.D., the terms
8 and conditions and other matters contained in this Stipulated Surrender of License and
9 Disciplinary Order. I approve its form and content.

10 DATED: _____
11 PETER R. OSINOFF, ESQ.
12 DEREK F. O'REILLY-JONES, ESQ.
13 Attorneys for Respondent

14 **ENDORSEMENT**

15 The foregoing Stipulated Surrender of License and Disciplinary Order is hereby
16 respectfully submitted for consideration by the Medical Board of California of the Department of
17 Consumer Affairs.

18 DATED: January 10, 2025

Respectfully submitted,

19 ROB BONTA
20 Attorney General of California
21 ALEXANDRA M. ALVAREZ
22 Supervising Deputy Attorney General

23 
24 CHRISTINE A. RHEE
25 Deputy Attorney General
26 Attorneys for Complainant

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Exhibit A

Accusation No. 800-2021-077150

1 ROB BONTA
Attorney General of California
2 ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
3 CHRISTINE A. RHEE
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8 *Attorneys for Complainant*

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

12
13 In the Matter of the Accusation Against:

Case No. 800-2021-077150

14 **TANNAZ EBRAHIMI ADIB, M.D.**
15 **3927 Waring Road, Suite D**
Oceanside, CA 92056-4458

A C C U S A T I O N

16 **Physician's and Surgeon's Certificate**
17 **No. A 121761,**

18 **Respondent.**

19
20 **PARTIES**

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

24 2. On or about June 20, 2012, the Medical Board issued Physician's and Surgeon's
25 Certificate No. A 121761 to Tannaz Ebrahimi Adib, M.D. (Respondent). The Physician's and
26 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
27 herein and will expire on November 30, 2025, unless renewed.

28 ///

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 2227 of the Code states, in pertinent part:

(a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter:

(1) Have his or her license revoked upon order of the board.

(2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.

(3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.

(4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.

(5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.

...

5. Section 2234 of the Code, states, in pertinent part:

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

...

(b) Gross negligence.

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

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

(2) When the standard of care requires a change in the diagnosis, act, or omission that constitutes the negligent act described in paragraph (1), including, but

1 not limited to, a reevaluation of the diagnosis or a change in treatment, and the
2 licensee's conduct departs from the applicable standard of care, each departure
3 constitutes a separate and distinct breach of the standard of care.

4 6. Section 2266 of the Code states that the failure of a physician and surgeon to maintain
5 adequate and accurate records relating to the provision of services to their patients constitutes
6 unprofessional conduct.

7 COST RECOVERY

8 7. Section 125.3 of the Code states, in pertinent part:

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

15 (b) In the case of a disciplined licensee that is a corporation or a partnership, the
16 order may be made against the licensed corporate entity or licensed partnership.

17 (c) A certified copy of the actual costs, or a good faith estimate of costs where
18 actual costs are not available, signed by the entity bringing the proceeding or its
19 designated representative shall be prima facie evidence of reasonable costs of
20 investigation and prosecution of the case. The costs shall include the amount of
21 investigative and enforcement costs up to the date of the hearing, including, but not
22 limited to, charges imposed by the Attorney General.

23 (d) The administrative law judge shall make a proposed finding of the amount
24 of reasonable costs of investigation and prosecution of the case when requested
25 pursuant to subdivision (a). The finding of the administrative law judge with regard to
26 costs shall not be reviewable by the board to increase the cost award. The board may
27 reduce or eliminate the cost award, or remand to the administrative law judge if the
28 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.

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

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

1 licensee who demonstrates financial hardship and who enters into a formal agreement
2 with the board to reimburse the board within that one-year period for the unpaid
costs.

3 (h) All costs recovered under this section shall be considered a reimbursement
4 for costs incurred and shall be deposited in the fund of the board recovering the costs
to be available upon appropriation by the Legislature.

5 (i) Nothing in this section shall preclude a board from including the recovery of
6 the costs of investigation and enforcement of a case in any stipulated settlement.

7 ...

8 **FIRST CAUSE FOR DISCIPLINE**
9 **(Gross Negligence)**

10 8. Respondent has subjected her Physician's and Surgeon's Certificate No. A 121761 to
11 disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (b), of
12 the Code, in that she committed gross negligence in the care and treatment of Patient A,¹ as more
13 particularly alleged hereafter:

14 **Patient A**

15 9. On or about August 21, 2017, at approximately 2:05 a.m., Patient A, a 36-year-old
16 female, presented at the hospital at 39 and 4/7 weeks pregnant with the complaint that her water
17 had broken at home. Patient A had a history of two prior cesarean sections, and the treatment
18 plan for this birth was for another cesarean section and a bilateral tubal ligation. She received full
19 prenatal care from Respondent.

20 10. At the time Patient A presented at the hospital, there were concerns that Patient A
21 may have pre-eclampsia. Laboratory testing was therefore ordered to determine whether Patient
22 A had pre-eclampsia and she was given magnesium sulfate. At admission, Patient A was 1.5
23 centimeters dilated and the fetus was in breech position.

24 11. From the time Patient A presented to the hospital at approximately 2:05 a.m. to 7:00
25 a.m., Respondent was on call. At approximately 4:19 a.m., another treatment provider, C.L.,
26 examined Patient A. Respondent signed off on C.L.'s note documenting a history and physical.

27 _____
28 ¹ The patients' names have been omitted to protect their privacy. Respondent is aware of
the patients' identities.

1 According to that note's treatment plan, Patient A was admitted to Labor and Delivery for a
2 repeat cesarean section and bilateral tubal ligation, which was scheduled for 7:30 a.m., unless
3 Patient A progressed to active labor. C.L. noted that Respondent had been notified about Patient
4 A's status and that Respondent agreed with the plan of care.

5 12. On or about August 21, 2017, at approximately 9:00 a.m., another physician
6 performed the cesarean section on Patient A without complication.

7 13. Respondent committed gross negligence in her care and treatment of Patient A, which
8 includes, but is not limited to, her failure to go to the hospital and perform a cesarean section on
9 Patient A, when Patient A presented with high risk factors including symptoms consistent with
10 pre-eclampsia, breech presentation of the fetus, the risk of cord prolapse, and a history of two
11 prior cesarean sections.

12 **SECOND CAUSE FOR DISCIPLINE**
13 **(Repeated Negligent Acts)**

14 14. Respondent has further subjected her Physician's and Surgeon's Certificate
15 No. A 121671 to disciplinary action under sections 2227 and 2234, as defined by section 2234,
16 subdivision (c), of the Code, in that she committed repeated negligent acts in the care and
17 treatment of Patients A, B, and C, as more particularly alleged hereafter:

18 **Patient A**

19 15. Paragraphs 9 through 13, above, are hereby incorporated by reference and re-alleged
20 as if fully set forth herein.

21 **Patient B**

22 16. On or about October 18, 2017, at approximately 11:00 a.m., Patient B, a 39-year-old
23 woman, presented to the hospital at 38 weeks gestation with complaints of vaginal spotting.
24 Patient B reported that the bleeding started in the morning, with contractions starting the night
25 prior. Respondent examined Patient B around the time of her hospital admission. Respondent
26 documented that her working diagnosis was placental abruption and that her plan was for
27 continuous monitoring and an urgent cesarean section. Respondent did not order any imaging
28 and/or ultrasound to rule out placental abruption or placenta previa.

1 17. Three hours later, at approximately 2:00 p.m., Respondent performed a cesarean
2 section on Patient B without complication.

3 18. Respondent committed negligence in her treatment and care of Patient B, which
4 includes, but is not limited to, her failure to order imaging and/or ultrasound at the time of Patient
5 B's arrival at the hospital to ensure the fetus's stability.

6 Patient C

7 19. On or about October 19, 2018, Patient C, a 51-year-old woman with a pertinent
8 history of left lower quadrant pain and a growing cyst on her ovary, underwent a robotic assisted
9 exploratory laparotomy performed by Respondent. During the procedure, Respondent observed
10 that Patient C also had extensive left-sided intra peritoneal adhesions. Respondent requested a
11 general surgeon consult, and, at the general surgeon's direction, Respondent performed lysis of
12 the adhesions. Respondent did not document that this intraoperative consult occurred with a
13 general surgeon or the general surgeon's subsequent actions in her operative report.

14 20. Patient C experienced post-surgical complications including bowel perforation, acute
15 renal failure, sepsis, peritonitis, and wound infection.

16 21. Respondent committed negligence in her treatment and care of Patient C, which
17 includes, but is not limited to, her failure to document that she requested an intraoperative consult
18 from a general surgeon and the general surgeon's subsequent actions during Patient C's surgery.

19 **THIRD CAUSE FOR DISCIPLINE**
20 **(Failure to Maintain Adequate and Accurate Records)**

21 22. Respondent has further subjected her Physician's and Surgeon's Certificate
22 No. 121761 to disciplinary action under sections 2227 and 2234, as defined by section 2266, of
23 the Code, in that she failed to maintain adequate and accurate records for Patient C, as more
24 particularly alleged in paragraphs 19 through 21, above, which are hereby incorporated by
25 reference and re-alleged as if fully set forth herein.

26 **PRAYER**

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

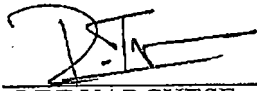
1 1. Revoking or suspending Physician's and Surgeon's Certificate No. A 121761, issued
2 to Respondent Tannaz Ebrahimi Adib, M.D.;

3 2. Revoking, suspending or denying approval of Respondent Tannaz Ebrahimi Adib,
4 M.D.'s authority to supervise physician assistants and advanced practice nurses;

5 3. Ordering Respondent Tannaz Ebrahimi Adib, M.D., to pay the Board the costs of the
6 investigation and enforcement of this case, and if placed on probation, the costs of probation
7 monitoring; and

8 4. Taking such other and further action as deemed necessary and proper.

9
10 DATED: APR 25 2024



REJI VARGHESE
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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