

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

In the Matter of the Accusation Against:

Stan Gordon Poulos, M.D.

Physician's and Surgeon's
Certificate No. G 31262

Respondent.

MBC File # 800-2022-093530

**ORDER CORRECTING NUNC PRO TUNC
CLERICAL ERROR IN "DISCIPLINARY ORDER" PORTION OF DECISION**

On its own motion, the Medical Board of California (hereafter "Board") finds that there is a clerical error in the "Disciplinary Order" portion of the Decision in the above-entitled matter and that such clerical error shall be corrected so that the "Effective" date reflects the correct date.

IT IS HEREBY ORDERED that the "Effective" date contained on the Decision Order Page in the above-entitled matter are hereby amended and corrected nunc pro tunc as of the date of entry of the Decision to read as *October 1, 2025*, respectively.

March 11, 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:**

Stan Gordon Poulos, M.D.

**Physician's and Surgeon's
Certificate No. G 31262**

Case No. 800-2022-093530

Respondent.

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 February 27, 2025. IT IS SO ORDERED February 20, 2025.

MEDICAL BOARD OF CALIFORNIA



**Reji Varghese
Executive Director**

1 ROB BONTA
2 Attorney General of California
3 ALEXANDRA M. ALVAREZ
4 Supervising Deputy Attorney General
5 KAROLYN M. WESTFALL
6 Deputy Attorney General
7 State Bar No. 234540
8 600 West Broadway, Suite 1800
9 San Diego, CA 92101
10 P.O. Box 85266
11 San Diego, CA 92186-5266
12 Telephone: (619) 738-9465
13 Facsimile: (619) 645-2061

14 *Attorneys for Complainant*

15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

13 In the Matter of the Accusation Against:

14 **STAN GORDON POULOS, M.D.**
15 **350 Bon Air Road, Suite 300**
16 **Greenbrae, CA 94904**

17 **Physician's and Surgeon's Certificate**
18 **No. G 31262,**

19 Respondent.

Case No. 800-2022-093530

OAH No. 2024070140

**STIPULATED SURRENDER OF
LICENSE AND DISCIPLINARY ORDER**

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

21 **PARTIES**

22 1. Reji Varghese (Complainant) is the Executive Director of the Medical Board of
23 California (Board). He brought this action solely in his official capacity and is represented in this
24 matter by Rob Bonta, Attorney General of the State of California, by Karolyn M. Westfall,
25 Deputy Attorney General.

26 2. Stan Gordon Poulos, M.D. (Respondent) is represented in this proceeding by attorney
27 Warren R. Webster, Esq., whose address is: 111 Pine Street, Suite 1530, San Francisco, CA
28 94111.

3. On or about November 28, 1975, the Board issued Physician's and Surgeon's Certificate No. G 31262 to Respondent. That license was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2022-093530 and will expire on November 30, 2025, unless renewed.

4. On or about January 31, 2025, Respondent stipulated to an Interim Order Imposing License Restrictions to be issued by the Office of Administrative Hearings, immediately imposing license restrictions against Physician's and Surgeon's Certificate No. G 31262 and prohibiting Respondent from providing medical care and treatment to any patient. As a result, Respondent remains prohibited from providing medical care and treatment to any patient pending the issuance of a final decision on Accusation No. 800-2022-093530.

JURISDICTION

5. Accusation No. 800-2022-093530 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 May 13, 2024. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 800-2022-093530 is attached hereto as Exhibit A and incorporated by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2022-093530. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Disciplinary Order.

7. Respondent is fully aware of his 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 him; the right to present evidence and to testify on his 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.

///

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

3 9. Having the benefit of counsel, Respondent voluntarily, knowingly, and intelligently
4 stipulates to the surrender of his Physician's and Surgeon's Certificate No. G 31262 with an
5 effective date of October 1, 2025.

6 **CULPABILITY**

7 10. Respondent admits that at an administrative hearing, Complainant could establish a
8 *prima facie* case with respect to the charges and allegations contained in Accusation No. 800-
9 2022-093530, agrees that cause exists for discipline and hereby surrenders his Physician's and
10 Surgeon's Certificate No. G 31262 for the Board's formal acceptance.

11 11. Respondent understands that by signing this stipulation he enables the Board to issue
12 an order accepting the surrender of his Physician's and Surgeon's Certificate without further
13 process.

14 **RESERVATION**

15 12. The admissions made by Respondent herein are only for the purposes of this
16 proceeding, or any other proceedings in which the Medical Board of California or other
17 professional licensing agency is involved, and shall not be admissible in any other criminal or
18 civil proceeding.

19 **CONTINGENCY**

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

23 14. Respondent understands that, by signing this stipulation, he enables the Executive
24 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his
25 Physician's and Surgeon's Certificate No. G 31262 without further notice to, or opportunity to be
26 heard by, Respondent.

27 15. This Stipulated Surrender of License and Disciplinary Order shall be subject to the
28 approval of the Executive Director on behalf of the Board. The parties agree that this Stipulated

1 Surrender of License and Disciplinary Order shall be submitted to the Executive Director for his
2 consideration in the above-entitled matter and, further, that the Executive Director shall have a
3 reasonable period of time in which to consider and act on this Stipulated Surrender of License and
4 Disciplinary Order after receiving it. By signing this stipulation, Respondent fully understands
5 and agrees that he may not withdraw his agreement or seek to rescind this stipulation prior to the
6 time the Executive Director, on behalf of the Medical Board, considers and acts upon it.

7 16. The parties agree that this Stipulated Surrender of License and Disciplinary Order
8 shall be null and void and not binding upon the parties unless approved and adopted by the
9 Executive Director on behalf of the Board, except for this paragraph, which shall remain in full
10 force and effect. Respondent fully understands and agrees that in deciding whether or not to
11 approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Executive
12 Director and/or the Board may receive oral and written communications from its staff and/or the
13 Attorney General's Office. Communications pursuant to this paragraph shall not disqualify the
14 Executive Director, the Board, any member thereof, and/or any other person from future
15 participation in this or any other matter affecting or involving respondent. In the event that the
16 Executive Director on behalf of the Board does not, in his discretion, approve and adopt this
17 Stipulated Surrender of License and Disciplinary Order, with the exception of this paragraph, it
18 shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied
19 upon or introduced in any disciplinary action by either party hereto. Respondent further agrees
20 that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason
21 by the Executive Director on behalf of the Board, Respondent will assert no claim that the
22 Executive Director, the Board, or any member thereof, was prejudiced by its/his/her review,
23 discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or
24 of any matter or matters related hereto.

25 **ADDITIONAL PROVISIONS**

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

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

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

7 **ORDER**

8 IT IS HEREBY ORDERED that effective October 1, 2025, Physician's and Surgeon's
9 Certificate No. G 31262, issued to Respondent Stan Gordon Poulos, M.D., is surrendered and
10 accepted by the Board.

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

15 2. Respondent shall lose all rights and privileges as a physician and surgeon in
16 California as of the effective date of the Board's Decision and Order.

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

19 4. If Respondent ever files an application for licensure or a petition for reinstatement in
20 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
21 comply with all the laws, regulations and procedures for reinstatement of a revoked or
22 surrendered license in effect at the time the petition is filed, and all of the charges and allegations
23 contained in Accusation No. 800-2022-093530 shall be deemed to be true, correct and admitted
24 by Respondent when the Board determines whether to grant or deny the petition.

25 5. Respondent shall pay the agency its costs of investigation and enforcement in the
26 amount of \$31,550.00 (thirty-one thousand five hundred fifty dollars and zero cents) prior to
27 issuance of a new or reinstated license.

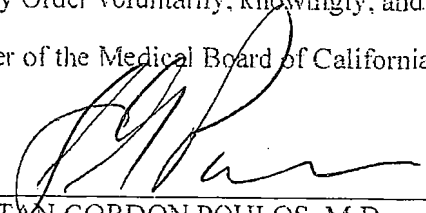
28 ///

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. 800-2022-093530 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 attorney Warren R. Webster, 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, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: 2/4/2025


STAN GORDON POULOS, M.D.
Respondent

I have read and fully discussed with Respondent Stan Gordon Poulos, M.D. the terms and conditions and other matters contained in this Stipulated Surrender of License and Disciplinary Order. I approve its form and content.

DATED: 2-4-2025


WARREN R. WEBSTER, ESQ.
Attorney for Respondent

///

///

///

///

///

///

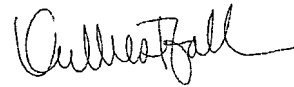
ENDORSEMENT

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

DATED: 2/4/25

Respectfully submitted,

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



KAROLYN M. WESTFALL
Deputy Attorney General
Attorneys for Complainant

SF2024400184
84942285.docx

Exhibit A

Accusation No. 800-2022-093530

1 ROB BONTA
Attorney General of California
2 ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
3 KAROLYN M. WESTFALL
Deputy Attorney General
4 State Bar No. 234540
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9465
7 Facsimile: (619) 645-2061

8 *Attorneys for Complainant*

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

14 In the Matter of the Accusation Against:

Case No. 800-2022-093530

15 **STAN GORDON POULOS, M.D.**
350 Bon Air Road, Suite 300
Greenbrae, CA 94904

A C C U S A T I O N

16 **Physician's and Surgeon's Certificate**
17 **No. G 31262,**

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 November 28, 1975, the Medical Board issued Physician's and
25 Surgeon's Certificate No. G 31262 to Stan Gordon Poulos, M.D. (Respondent). The Physician's
26 and 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 ///

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

2
3
4

5

6
7
8

9

10

11
1213
14

15

16

18

19
20

21

22

23
24
25

26
27

28

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

6 ...

7 COST RECOVERY

8 6. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
9 administrative law judge to direct a licensee found to have committed a violation or violations of
10 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
11 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
12 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
13 included in a stipulated settlement.

14 FIRST CAUSE FOR DISCIPLINE

15 (Gross Negligence)

16 7. Respondent has subjected his Physician's and Surgeon's Certificate No. G 31262 to
17 disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (b), of
18 the Code, in that Respondent was grossly negligent in his care and treatment of Patients A and B¹,
19 as more particularly alleged hereinafter:

20 PATIENT A

21 8. On or about November 22, 2022, Patient A, a then forty-year-old female, presented to
22 Plastic Surgery Specialists (PSS) for a plastic surgery consultation with Respondent. Patient A
23 had a medical history that included excision of a benign liver tumor approximately ten years prior
24 resulting in multi-organ failure and a large chevron scar on her abdomen. On exam, Respondent
25 noted Patient A had a very prominent wing-shaped scar of upper subcostal areas with underlying
26 adhesions and hypertrophic scarring. Respondent recommended a standard abdominoplasty,²

27 ¹ To protect the privacy of the patients involved, the patients' names have not been
28 included in this pleading. Respondent is aware of the identity of the patients referred to herein.

² Abdominoplasty (also known as a "tummy tuck") is a surgical procedure that involves
the removal of excess skin and fat from the middle and lower abdomen.

1 breast augmentation, fat transfer, and scar revision in a two-stage approach. Even with a two-
2 stage approach, Respondent informed Patient A that there was a potential limitation of vascularity
3 to the upper abdomen due to her previous surgery, but he believed after many years he would
4 expect healthy vascularization. Respondent did not at this visit, or any visit thereafter, order or
5 obtain a soft tissue vascularity study of Patient A's abdomen or perform any other pre-surgical
6 investigation of blood supply to Patient A's abdomen.

7 9. On or about December 8, 2022, Patient A presented to Respondent for a second
8 plastic surgery consultation. At this visit, Respondent recommended abdominoplasty, breast
9 augmentation, and fat transfer for Patient A's first surgery. Respondent informed Patient A that
10 he cannot predict whether her abdominal scar will affect the viability of the abdominal flap,
11 which could result in wound healing problems and need for further surgery.³

12 10. On or about January 31, 2023, Respondent performed a breast augmentation,
13 abdominoplasty, liposuction with fat transfer, and supratrochanteric thigh depression on Patient
14 A.

15 11. On or about February 7, 2023, Patient A presented to Respondent for her first post-
16 operative visit. On exam, Respondent noted blistering on Patient A's central abdomen, which he
17 assumed was related to decreased vascularity due to her previous chevron incision of her upper
18 abdomen.

19 12. Between on or about February 9, 2023, and on or about March 6, 2023, Patient A
20 presented to PSS for multiple post-operative visits. Throughout that time, Patient A developed
21 worsening dysvascularity on her abdomen, evidenced by two areas of black eschar and open
22 wounds consistent with nonviable tissue.

23 13. On or about March 4, 2023, Patient A presented to the emergency department at
24 UCSF Hospital with complaints of abdominal pain and poor wound healing. Patient A was
25 diagnosed with full thickness abdominal wall necrosis and subsequently underwent excisional
26 debridement of the abdominal wound.

27 ³ At his subject interview on November 1, 2023, Respondent indicated that a large
28 incision over the abdomen can interfere with blood supply, but after a 10-year period, he would
not expect Patient A's chevron scar to be a complicating mechanism.

1 14. Respondent committed gross negligence in his care and treatment of Patient A by
2 performing an abdominoplasty on a patient with questionable vascularity without first obtaining a
3 soft tissue vascularity study or other pre-operative investigation of blood supply to Patient A's
4 abdomen.

5 PATIENT B

6 15. On or about November 1, 2022, Patient B, a then sixty-seven-year-old female,
7 presented to PSS for a virtual plastic surgery consultation with Respondent. Patient B had a
8 complicated medical history that included hypothyroidism, obstructive sleep apnea, high
9 cholesterol, depression, obesity, high blood pressure, and a recent stroke in February 2022.
10 Patient B took multiple medications for her various medical conditions, including daily aspirin.
11 Respondent informed Patient B that he felt she was a good candidate for a face and neck lift,
12 blepharoplasty,⁴ and bilateral brachioplasty.⁵

13 16. On or about November 8, 2022, Patient B presented to Respondent for an in-person
14 plastic surgery consultation. Respondent recommended a face and neck lift with fat transfer,
15 lower blepharoplasty, and brachioplasty. Respondent noted Patient B had a previous basilar
16 artery stroke and required clearance from her primary care physician.

17 17. On or about November 11, 2022, Patient B's neurologist informed Respondent that it
18 would be acceptable from a neurological standpoint that Patient B be off aspirin for the day
19 before and day of her plastic surgery procedure.

20 18. On or about November 14, 2022, Respondent's physician assistant J.T. (J.T.) spoke
21 with Patient B's primary care physician, Dr. M.G., who expressed concerns about Patient B
22 having an elective surgery given her current health conditions and history of recent stroke.

23 19. On or about November 16, 2022, J.T. spoke with Dr. M.G. a second time. During
24 that discussion, Dr. M.G. again expressed concern about Patient B undergoing a six-hour
25 procedure under general anesthesia given her history of recent stroke, and the fact that Patient B

26 ⁴ Blepharoplasty (also known as an "eye lift") is a surgical procedure that involves the
27 removal of excess skin from the eyelids.

28 ⁵ Brachioplasty (also known as an "arm lift") is a surgical procedure that involves the
removal of excess skin and tissue from the upper arms.

1 was still recovering from the stroke and walking with a cane. Dr. M.G. recommended
2 Respondent stage the procedures to ensure Patient B would be under general anesthesia for less
3 time. J.T. informed Respondent about this discussion, but Respondent decided to proceed with
4 the surgery as planned.

5 20. On or about November 21, 2022, Patient B presented to Respondent for her face and
6 neck lift, lower blepharoplasty, and bilateral brachioplasty. During her preoperative evaluation,
7 Patient B's thrombosis risk factor assessment revealed Patient B to be high risk, and Respondent
8 noted Patient B was taking her daily aspirin. The total anesthesia time for Patient B's surgery on
9 that day was approximately six hours and twenty-six minutes.

10 21. On or about November 22, 2022, Patient B presented to Respondent for a post-
11 operative visit. On exam, Respondent noted marked swelling, generalized edema, and hematoma.
12 Respondent recommended warm compresses and informed Patient B that he will open and drain
13 if the bleeding persists.

14 22. On or about November 23, 2022, Patient B called PSS multiple times to report
15 significant pain and swelling in her neck.

16 23. On or about November 25, 2022, Patient B presented to the emergency department at
17 Marin Health Medical Center with complaints of worsening facial bruising and swelling, and
18 subsequently underwent an evacuation of a hematoma.

19 24. Respondent committed gross negligence in his care and treatment of Patient B by
20 performing a long elective surgery on a patient with a prior recent neurologic event, without
21 paying sufficient attention to her anticoagulation status and disregarding the medical clearance
22 recommendation.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Repeated Negligent Acts)**

3 25. Respondent has further subjected his Physician's and Surgeon's Certificate No.
4 G 31262 to disciplinary action under sections 2227 and 2234, as defined by section 2234,
5 subdivision (c), of the Code, in that Respondent committed repeated negligent acts in his care and
6 treatment of Patients A and B, as more particularly alleged in paragraphs 7 through 24 above,
7 which are hereby incorporated by reference and realleged as if fully set forth herein.

8 **PRAYER**

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

11 1. Revoking or suspending Physician's and Surgeon's Certificate No. G 31262, issued
12 to Respondent Stan Gordon Poulos, M.D.;

13 2. Revoking, suspending, or denying approval of Respondent Stan Gordon Poulos,
14 M.D.'s authority to supervise physician assistants and advanced practice nurses;

15 3. Ordering Respondent Stan Gordon Poulos, M.D., to pay the Board the costs of the
16 investigation and enforcement of this case, and if placed on probation, the costs of probation
17 monitoring; and

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

19
20 DATED: MAY 13 2024

21 
22 REJI VARGHESE
23 Executive Director
24 Medical Board of California
25 Department of Consumer Affairs
26 State of California
27 Complainant
28

SF2024400184
84448954.docx