

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

In the Matter of the Accusation
Against:

Amardeep Singh Bhatti, M.D.

Physician's and Surgeon's
Certificate No. A 169876

Case No.: 800-2024-105321

Respondent.

DECISION

The attached Stipulated Settlement 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 May 30, 2025.

IT IS SO ORDERED: May 1, 2025.

MEDICAL BOARD OF CALIFORNIA

Michelle A. Bholat, MD
Michelle Anne Bholat, Chair
Panel A

1 ROB BONTA
2 Attorney General of California
3 MICHAEL C. BRUMMEL
4 Supervising Deputy Attorney General
5 JADE WOLANSKY
6 Deputy Attorney General
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14 E-mail: Jade.Wolansky@doj.ca.gov
15 *Attorneys for Complainant*

12 In the Matter of the Accusation Against: Case No. 800-2024-105321

13 AMARDEEP SINGH BHATTI, M.D.

14 1020 29th Street, Suite 480
Sacramento, CA 95816-5125

**Physician's and Surgeon's Certificate No. A
169876**

Case No. 800-2024-105321

OAH No. 2024080921

STIPULATED SETTLEMENT AND DISCIPLINARY ORDER

Respondent.

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

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 Jade Wolansky, Deputy
25 Attorney General.

26 2. Respondent Amardeep Singh Bhatti, M.D. (Respondent) is represented in this
27 proceeding by attorney Seth Weinstein, Esq., whose address is: 3500 W. Olive Ave., Suite 300
28 Burbank, CA 91505.

1 3. On or about August 19, 2020, the Board issued Physician's and Surgeon's Certificate
2 No. A 169876 to Amardeep Singh Bhatti, M.D. (Respondent). The Physician's and Surgeon's
3 Certificate was in full force and effect at all times relevant to the charges brought in Accusation
4 No. 800-2024-105321, and will expire on August 31, 2026, unless renewed.

JURISDICTION

6 4. Accusation No. 800-2024-105321 was filed before the Board, and is currently
7 pending against Respondent. The Accusation and all other statutorily required documents were
8 properly served on Respondent on August 8, 2024. Respondent timely filed his Notice of
9 Defense contesting the Accusation.

10 5. A copy of Accusation No. 800-2024-105321 is attached as **Exhibit A** and
11 incorporated herein by reference.

ADVISEMENT AND WAIVERS

13 6. Respondent has carefully read, fully discussed with counsel, and understands the
14 charges and allegations in Accusation No. 800-2024-105321. Respondent has also carefully read,
15 fully discussed with his counsel, and understands the effects of this Stipulated Settlement and
16 Disciplinary Order.

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

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

CULPABILITY

26 9. Respondent admits the truth of each and every charge and allegation in Accusation
27 No. 800-2024-105321.

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1 10. Respondent agrees that his Physician's and Surgeon's Certificate is subject to
2 discipline and agrees to be bound by the Board's probationary terms as set forth in the
3 Disciplinary Order below.

CONTINGENCY

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

15 12. This Stipulated Settlement and Disciplinary Order is intended by the parties herein to
16 be an integrated writing representing the complete, final and exclusive embodiment of the
17 agreement of the parties in this above entitled matter.

18 13. Respondent agrees that if he ever petitions for early termination or modification of
19 probation, or if an accusation and/or petition to revoke probation is filed against him before the
20 Board, all of the charges and allegations contained in Accusation No. 800-2024-105321 shall be
21 deemed true, correct and fully admitted by respondent for purposes of any such proceeding or any
22 other licensing proceeding involving Respondent in the State of California.

23 14. The parties understand and agree that Portable Document Format (PDF) and facsimile
24 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
25 signatures thereto, shall have the same force and effect as the originals.

26 15. In consideration of the foregoing admissions and stipulations, the parties agree that
27 the Board may, without further notice or opportunity to be heard by the Respondent, issue and
28 enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 169876 issued to Respondent Amardeep Singh Bhatti, M.D. is revoked. However, the revocation is stayed and Respondent is placed on probation for four (4) years on the following terms and conditions:

1. ALCOHOL - ABSTAIN FROM USE. Respondent shall abstain completely from the use of products or beverages containing alcohol.

2. CONTROLLED SUBSTANCES - ABSTAIN FROM USE. Respondent shall abstain completely from the personal use or possession of controlled substances as defined in the California Uniform Controlled Substances Act, dangerous drugs as defined by Business and Professions Code section 4022, and any drugs requiring a prescription. This prohibition does not apply to medications lawfully prescribed to Respondent by another practitioner for a bona fide illness or condition.

Within 15 calendar days of receiving any lawfully prescribed medications, Respondent shall notify the Board or its designee of the: issuing practitioner's name, address, and telephone number; medication name, strength, and quantity; and issuing pharmacy name, address, and telephone number.

3. **PSYCHIATRIC EVALUATION.** Within 30 calendar days of the effective date of this Decision, and on whatever periodic basis thereafter may be required by the Board or its designee, Respondent shall undergo and complete a psychiatric evaluation (and psychological testing, if deemed necessary) by a Board-appointed board certified psychiatrist, who shall consider any information provided by the Board or designee and any other information the psychiatrist deems relevant, and shall furnish a written evaluation report to the Board or its designee. Psychiatric evaluations conducted prior to the effective date of the Decision shall not be accepted towards the fulfillment of this requirement. Respondent shall pay the cost of all psychiatric evaluations and psychological testing.

Respondent shall comply with all restrictions or conditions recommended by the evaluating psychiatrist within 15 calendar days after being notified by the Board or its designee.

1 4. NOTICE OF EMPLOYER OR SUPERVISOR INFORMATION. Within seven (7)
2 days of the effective date of this Decision, Respondent shall provide to the Board the names,
3 physical addresses, mailing addresses, and telephone numbers of any and all employers and
4 supervisors. Respondent shall also provide specific, written consent for the Board, Respondent's
5 worksite monitor, and Respondent's employers and supervisors to communicate regarding
6 Respondent's work status, performance, and monitoring.

7 For purposes of this section, "supervisors" shall include the Chief of Staff and Health or
8 Well Being Committee Chair, or equivalent, if applicable, when the Respondent has medical staff
9 privileges.

10 5. BIOLOGICAL FLUID TESTING. Respondent shall immediately submit to
11 biological fluid testing, at Respondent's expense, upon request of the Board or its designee.
12 "Biological fluid testing" may include, but is not limited to, urine, blood, breathalyzer, hair
13 follicle testing, or similar drug screening approved by the Board or its designee. Respondent shall
14 make daily contact with the Board or its designee to determine whether biological fluid testing is
15 required. Respondent shall be tested on the date of the notification as directed by the Board or its
16 designee. The Board may order a Respondent to undergo a biological fluid test on any day, at
17 any time, including weekends and holidays. Except when testing on a specific date as ordered by
18 the Board or its designee, the scheduling of biological fluid testing shall be done on a random
19 basis. The cost of biological fluid testing shall be borne by the Respondent.

20 During the first year of probation, Respondent shall be subject to 52 to 104 random tests.
21 During the second year of probation and for the duration of the probationary term, up to five (5)
22 years, Respondent shall be subject to 36 to 104 random tests per year. Only if there has been no
23 positive biological fluid tests in the previous five (5) consecutive years of probation, may testing
24 be reduced to one (1) time per month. Nothing precludes the Board from increasing the number
25 of random tests to the first-year level of frequency for any reason.

26 Prior to practicing medicine, Respondent shall contract with a laboratory or service,
27 approved in advance by the Board or its designee, that will conduct random, unannounced,
28 observed, biological fluid testing and meets all of the following standards:

1 (a) Its specimen collectors are either certified by the Drug and Alcohol Testing Industry
2 Association or have completed the training required to serve as a collector for the United
3 States Department of Transportation.

4 (b) Its specimen collectors conform to the current United States Department of
5 Transportation Specimen Collection Guidelines.

6 (c) Its testing locations comply with the Urine Specimen Collection Guidelines published
7 by the United States Department of Transportation without regard to the type of test
8 administered.

9 (d) Its specimen collectors observe the collection of testing specimens.

10 (e) Its laboratories are certified and accredited by the United States Department of Health
11 and Human Services.

12 (f) Its testing locations shall submit a specimen to a laboratory within one (1) business day
13 of receipt and all specimens collected shall be handled pursuant to chain of custody
14 procedures. The laboratory shall process and analyze the specimens and provide legally
15 defensible test results to the Board within seven (7) business days of receipt of the
16 specimen. The Board will be notified of non-negative results within one (1) business day
17 and will be notified of negative test results within seven (7) business days.

18 (g) Its testing locations possess all the materials, equipment, and technical expertise
19 necessary in order to test Respondent on any day of the week.

20 (h) Its testing locations are able to scientifically test for urine, blood, and hair specimens
21 for the detection of alcohol and illegal and controlled substances.

22 (i) It maintains testing sites located throughout California.

23 (j) It maintains an automated 24-hour toll-free telephone system and/or a secure on-line
24 computer database that allows the Respondent to check in daily for testing.

25 (k) It maintains a secure, HIPAA-compliant website or computer system that allows staff
26 access to drug test results and compliance reporting information that is available 24 hours a
27 day..

28 (l) It employs or contracts with toxicologists that are licensed physicians and have

knowledge of substance abuse disorders and the appropriate medical training to interpret and evaluate laboratory biological fluid test results, medical histories, and any other information relevant to biomedical information.

(m) It will not consider a toxicology screen to be negative if a positive result is obtained while practicing, even if the Respondent holds a valid prescription for the substance.

Prior to changing testing locations for any reason, including during vacation or other travel, alternative testing locations must be approved by the Board and meet the requirements above.

The contract shall require that the laboratory directly notify the Board or its designee of non-negative results within one (1) business day and negative test results within seven (7) business days of the results becoming available. Respondent shall maintain this laboratory or service contract during the period of probation.

A certified copy of any laboratory test result may be received in evidence in any proceedings between the Board and Respondent.

If a biological fluid test result indicates Respondent has used, consumed, ingested, or administered to himself or herself a prohibited substance, the Board shall order Respondent to cease practice and instruct Respondent to leave any place of work where Respondent is practicing medicine or providing medical services. The Board shall immediately notify all of Respondent's employers, supervisors and work monitors, if any, that Respondent may not practice medicine or provide medical services while the cease-practice order is in effect.

A biological fluid test will not be considered negative if a positive result is obtained while practicing, even if the practitioner holds a valid prescription for the substance. If no prohibited substance use exists, the Board shall lift the cease-practice order within one (1) business day.

After the issuance of a cease-practice order, the Board shall determine whether the positive biological fluid test is in fact evidence of prohibited substance use by consulting with the specimen collector and the laboratory, communicating with the licensee, his or her treating physician(s), other health care provider, or group facilitator, as applicable.

For purposes of this condition, the terms "biological fluid testing" and "testing" mean the acquisition and chemical analysis of a Respondent's urine, blood, breath, or hair.

1 For purposes of this condition, the term "prohibited substance" means an illegal drug, a
2 lawful drug not prescribed or ordered by an appropriately licensed health care provider for use by
3 Respondent and approved by the Board, alcohol, or any other substance the Respondent has been
4 instructed by the Board not to use, consume, ingest, or administer to himself or herself.

5 If the Board confirms that a positive biological fluid test is evidence of use of a prohibited
6 substance, Respondent has committed a major violation, as defined in section 1361.52(a), and the
7 Board shall impose any or all of the consequences set forth in section 1361.52(b), in addition to
8 any other terms or conditions the Board determines are necessary for public protection or to
9 enhance Respondent's rehabilitation.

10 6. **SUBSTANCE ABUSE SUPPORT GROUP MEETINGS.** Within thirty (30) days of
11 the effective date of this Decision, Respondent shall submit to the Board or its designee, for its
12 prior approval, the name of a substance abuse support group which he or she shall attend for the
13 duration of probation. Respondent shall attend substance abuse support group meetings at least
14 once per week, or as ordered by the Board or its designee. Respondent shall pay all substance
15 abuse support group meeting costs.

16 The facilitator of the substance abuse support group meeting shall have a minimum of three
17 (3) years experience in the treatment and rehabilitation of substance abuse, and shall be licensed
18 or certified by the state or nationally certified organizations. The facilitator shall not have a
19 current or former financial, personal, or business relationship with Respondent within the last five
20 (5) years. Respondent's previous participation in a substance abuse group support meeting led by
21 the same facilitator does not constitute a prohibited current or former financial, personal, or
22 business relationship.

23 The facilitator shall provide a signed document to the Board or its designee showing
24 Respondent's name, the group name, the date and location of the meeting, Respondent's
25 attendance, and Respondent's level of participation and progress. The facilitator shall report any
26 unexcused absence by Respondent from any substance abuse support group meeting to the Board,
27 or its designee, within twenty-four (24) hours of the unexcused absence.

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1 7. WORKSITE MONITOR FOR SUBSTANCE-ABUSING LICENSEE. Within thirty
2 (30) calendar days of the effective date of this Decision, Respondent shall submit to the Board or
3 its designee for prior approval as a worksite monitor, the name and qualifications of one or more
4 licensed physician and surgeon, other licensed health care professional if no physician and
5 surgeon is available, or, as approved by the Board or its designee, a person in a position of
6 authority who is capable of monitoring the Respondent at work.

7 The worksite monitor shall not have a current or former financial, personal, or familial
8 relationship with Respondent, or any other relationship that could reasonably be expected to
9 compromise the ability of the monitor to render impartial and unbiased reports to the Board or its
10 designee. If it is impractical for anyone but Respondent's employer to serve as the worksite
11 monitor, this requirement may be waived by the Board or its designee, however, under no
12 circumstances shall Respondent's worksite monitor be an employee or supervisee of the licensee.

13 The worksite monitor shall have an active unrestricted license with no disciplinary action
14 within the last five (5) years, and shall sign an affirmation that he or she has reviewed the terms
15 and conditions of Respondent's disciplinary order and agrees to monitor Respondent as set forth
16 by the Board or its designee.

17 Respondent shall pay all worksite monitoring costs.

18 The worksite monitor shall have face-to-face contact with Respondent in the work
19 environment on as frequent a basis as determined by the Board or its designee, but not less than
20 once per week; interview other staff in the office regarding Respondent's behavior, if requested
21 by the Board or its designee; and review Respondent's work attendance.

22 The worksite monitor shall verbally report any suspected substance abuse to the Board and
23 Respondent's employer or supervisor within one (1) business day of occurrence. If the suspected
24 substance abuse does not occur during the Board's normal business hours, the verbal report shall
25 be made to the Board or its designee within one (1) hour of the next business day. A written
26 report that includes the date, time, and location of the suspected abuse; Respondent's actions; and
27 any other information deemed important by the worksite monitor shall be submitted to the Board
28 or its designee within 48 hours of the occurrence.

1 The worksite monitor shall complete and submit a written report monthly or as directed by
2 the Board or its designee which shall include the following: (1) Respondent's name and
3 Physician's and Surgeon's Certificate number; (2) the worksite monitor's name and signature; (3)
4 the worksite monitor's license number, if applicable; (4) the location or location(s) of the
5 worksite; (5) the dates Respondent had face-to-face contact with the worksite monitor; (6) the
6 names of worksite staff interviewed, if applicable; (7) a report of Respondent's work attendance;
7 (8) any change in Respondent's behavior and/or personal habits; and (9) any indicators that can
8 lead to suspected substance abuse by Respondent. Respondent shall complete any required
9 consent forms and execute agreements with the approved worksite monitor and the Board, or its
10 designee, authorizing the Board, or its designee, and worksite monitor to exchange information.

11 If the worksite monitor resigns or is no longer available, Respondent shall, within five (5)
12 calendar days of such resignation or unavailability, submit to the Board or its designee, for prior
13 approval, the name and qualifications of a replacement monitor who will be assuming that
14 responsibility within fifteen (15) calendar days. If Respondent fails to obtain approval of a
15 replacement monitor within sixty (60) calendar days of the resignation or unavailability of the
16 monitor, Respondent shall receive a notification from the Board or its designee to cease the
17 practice of medicine within three (3) calendar days after being so notified. Respondent shall
18 cease the practice of medicine until a replacement monitor is approved and assumes monitoring
19 responsibility.

20 **8. VIOLATION OF PROBATION CONDITION FOR SUBSTANCE ABUSING**
21 LICENSEES. Failure to fully comply with any term or condition of probation is a violation of
22 probation.

23 A. If Respondent commits a major violation of probation as defined by section
24 1361.52, subdivision (a), of Title 16 of the California Code of Regulations, the Board shall take
25 one or more of the following actions:

26 (1) Issue an immediate cease-practice order and order Respondent to undergo a clinical
27 diagnostic evaluation to be conducted in accordance with section 1361.5, subdivision (c)(1), of
28 Title 16 of the California Code of Regulations, at Respondent's expense. The cease-practice

1 order issued by the Board or its designee shall state that Respondent must test negative for at least
2 a month of continuous biological fluid testing before being allowed to resume practice. For
3 purposes of determining the length of time a Respondent must test negative while undergoing
4 continuous biological fluid testing following issuance of a cease-practice order, a month is
5 defined as thirty calendar (30) days. Respondent may not resume the practice of medicine until
6 notified in writing by the Board or its designee that he or she may do so.

7 (2) Increase the frequency of biological fluid testing.
8 (3) Refer Respondent for further disciplinary action, such as suspension, revocation, or
9 other action as determined by the Board or its designee.

10 B. If Respondent commits a minor violation of probation as defined by section
11 1361.52, subdivision (c), of Title 16 of the California Code of Regulations, the Board shall take
12 one or more of the following actions:

13 (1) Issue a cease-practice order;
14 (2) Order practice limitations;
15 (3) Order or increase supervision of Respondent;
16 (4) Order increased documentation;
17 (5) Issue a citation and fine, or a warning letter;
18 (6) Order Respondent to undergo a clinical diagnostic evaluation to be conducted in
19 accordance with section 1361.5, subdivision (c)(1), of Title 16 of the California Code of
20 Regulations, at Respondent's expense;
21 (7) Take any other action as determined by the Board or its designee.

22 C. Nothing in this Decision shall be considered a limitation on the Board's authority
23 to revoke Respondent's probation if he or she has violated any term or condition of probation. If
24 Respondent violates probation in any respect, the Board, after giving Respondent notice and the
25 opportunity to be heard, may revoke probation and carry out the disciplinary order that was
26 stayed. If an Accusation, or Petition to Revoke Probation, or an Interim Suspension Order is filed
27 against Respondent during probation, the Board shall have continuing jurisdiction until the matter
28 is final, and the period of probation shall be extended until the matter is final.

1 9. PROFESSIONALISM PROGRAM (ETHICS COURSE). Within 60 calendar days of
2 the effective date of this Decision, respondent shall enroll in a professionalism program, that
3 meets the requirements of Title 16, California Code of Regulations (CCR) section 1358.1.
4 Respondent shall participate in and successfully complete that program. Respondent shall provide
5 any information and documents that the program may deem pertinent. Respondent shall
6 successfully complete the classroom component of the program not later than six (6) months after
7 respondent's initial enrollment, and the longitudinal component of the program not later than the
8 time specified by the program, but no later than one (1) year after attending the classroom
9 component. The professionalism program shall be at respondent's expense and shall be in
10 addition to the Continuing Medical Education (CME) requirements for renewal of licensure. A
11 professionalism program taken after the acts that gave rise to the charges in the Accusation, but
12 prior to the effective date of the Decision may, in the sole discretion of the Board or its designee,
13 be accepted towards the fulfillment of this condition if the program would have been approved by
14 the Board or its designee had the program been taken after the effective date of this Decision.

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

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

23 10. NOTIFICATION. Within seven (7) days of the effective date of this Decision, the
24 Respondent shall provide a true copy of this Decision and Accusation to the Chief of Staff or the
25 Chief Executive Officer at every hospital where privileges or membership are extended to
26 Respondent, at any other facility where Respondent engages in the practice of medicine,
27 including all physician and locum tenens registries or other similar agencies, and to the Chief
28 Executive Officer at every insurance carrier which extends malpractice insurance coverage to

1 Respondent. Respondent shall submit proof of compliance to the Board or its designee within 15
2 calendar days.

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

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

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

10 13. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby
11 ordered to reimburse the Board its costs of investigation and enforcement, including, but not
12 limited to, expert review, amended accusations, legal reviews, investigation(s), and subpoena
13 enforcement, as applicable, in the amount of \$34,742.75 (thirty-four thousand and seven hundred
14 and forty-two dollars and seventy-five cents). Costs shall be payable to the Medical Board of
15 California. Failure to pay such costs shall be considered a violation of probation.

16 Payment must be made in full within 30 calendar days of the effective date of the Order, or
17 by a payment plan approved by the Medical Board of California. Any and all requests for a
18 payment plan shall be submitted in writing by respondent to the Board. Failure to comply with
19 the payment plan shall be considered a violation of probation.

20 The filing of bankruptcy by respondent shall not relieve respondent of the responsibility to
21 repay investigation and enforcement costs, including expert review costs (if applicable).

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

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

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1 15. GENERAL PROBATION REQUIREMENTS.

2 Compliance with Probation Unit

3 Respondent shall comply with the Board's probation unit.

4 Address Changes

5 Respondent shall, at all times, keep the Board informed of Respondent's business and
6 residence addresses, email address (if available), and telephone number. Changes of such
7 addresses shall be immediately communicated in writing to the Board or its designee. Under no
8 circumstances shall a post office box serve as an address of record, except as allowed by Business
9 and Professions Code section 2021, subdivision (b).

10 Place of Practice

11 Respondent shall not engage in the practice of medicine in Respondent's or patient's place
12 of residence, unless the patient resides in a skilled nursing facility or other similar licensed
13 facility.

14 License Renewal

15 Respondent shall maintain a current and renewed California physician's and surgeon's
16 license.

17 Travel or Residence Outside California

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

21 In the event Respondent should leave the State of California to reside or to practice
22 Respondent shall notify the Board or its designee in writing 30 calendar days prior to the dates of
23 departure and return.

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

27 17. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or
28 its designee in writing within 15 calendar days of any periods of non-practice lasting more than

1 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is
2 defined as any period of time Respondent is not practicing medicine as defined in Business and
3 Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month in direct
4 patient care, clinical activity or teaching, or other activity as approved by the Board. If
5 Respondent resides in California and is considered to be in non-practice, Respondent shall
6 comply with all terms and conditions of probation. All time spent in an intensive training
7 program which has been approved by the Board or its designee shall not be considered non-
8 practice and does not relieve Respondent from complying with all the terms and conditions of
9 probation. Practicing medicine in another state of the United States or Federal jurisdiction while
10 on probation with the medical licensing authority of that state or jurisdiction shall not be
11 considered non-practice. A Board-ordered suspension of practice shall not be considered as a
12 period of non-practice.

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

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

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

20 Periods of non-practice for a Respondent residing outside of California will relieve
21 Respondent of the responsibility to comply with the probationary terms and conditions with the
22 exception of this condition and the following terms and conditions of probation: Obey All Laws;
23 General Probation Requirements; Quarterly Declarations; Abstain from the Use of Alcohol and/or
24 Controlled Substances; and Biological Fluid Testing.

25 18. COMPLETION OF PROBATION. Respondent shall comply with all financial
26 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
27 completion of probation. This term does not include cost recovery, which is due within 30
28 calendar days of the effective date of the Order, or by a payment plan approved by the Medical

1 Board and timely satisfied. Upon successful completion of probation, Respondent's certificate
2 shall be fully restored.

3 19. VIOLATION OF PROBATION. Failure to fully comply with any term or condition
4 of probation is a violation of probation. If Respondent violates probation in any respect, the
5 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and
6 carry out the disciplinary order that was stayed. If an Accusation, or Petition to Revoke Probation,
7 or an Interim Suspension Order is filed against Respondent during probation, the Board shall have
8 continuing jurisdiction until the matter is final, and the period of probation shall be extended until
9 the matter is final.

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

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

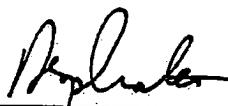
25 22. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for a
26 new license or certification, or petition for reinstatement of a license, by any other health care
27 licensing action agency in the State of California, all of the charges and allegations contained in
28 Accusation No. 800-2024-105321 shall be deemed to be true, correct, and admitted by

1 Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or
2 restrict license.

3 **ACCEPTANCE**

4 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
5 discussed it with my attorney, Seth Weinstein, Esq. I understand the stipulation and the effect it
6 will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and
7 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
8 Decision and Order of the Medical Board of California.

9
10 DATED: 2/28/2025


11 AMARDEEP SINGH BHATTI, M.D.
12 *Respondent*

13 I have read and fully discussed with Respondent Amardeep Singh Bhatti, M.D. the terms
14 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
15 Order. I approve its form and content.

16 DATED: 02-28-2025


17 SETH WEINSTEIN, ESQ.
18 *Attorney for Respondent*

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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: 2/28/2025

Respectfully submitted,

ROB BONTA
Attorney General of California
MICHAEL C. BRUMMEL
Supervising Deputy Attorney General

yadet Wolansky

JADE WOLANSKY
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 800-2024-105321

1 ROB BONTA
2 Attorney General of California
3 MICHAEL C. BRUMMEL
4 Supervising Deputy Attorney General
5 JOHN S. GATSCHE
6 Deputy Attorney General
7 State Bar No. 244388
California Department of Justice
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Telephone: (916) 210-7546
Facsimile: (916) 327-2247

Attorneys for Complainant

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

In the Matter of the Accusation Against:

Case No. 800-2024-105321

AMARDEEP SINGH BHATTI, M.D.
1020 29th Street, Suite 480
Sacramento, CA 95816-5125

ACCUSATION

**Physician's and Surgeon's Certificate
No. A 169876,**

Respondent.

PARTIES

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

2. On or about August 19, 2020, the Board issued Physician's and Surgeon's Certificate Number A 169876 to Amardeep Singh Bhatti, M.D. ("Respondent"). That Certificate was in full force and effect at all times relevant to the charges brought herein and will expire on August 31, 2026, unless renewed.

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.

STATUTORY PROVISIONS

6 4. Section 2227 of the Code provides, in pertinent part, that a licensee who is found
7 guilty under the Medical Practice Act may have his or her license revoked, suspended for a period
8 not to exceed one year, placed on probation and required to pay the costs of probation monitoring,
9 or such other action taken in relation to discipline as the Board deems proper.

10 5. Section 2228.1 of the Code states, in pertinent part:

18 (1) A final adjudication by the board following an administrative hearing or admitted findings or *prima facie* showing in a stipulated settlement establishing any of the following:

22 || 6. Section 2234 of the Code states, in pertinent part:

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

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

27 | //

28 | //

1 7. Section 2236 of the Code states, in pertinent part:

2 (a) The conviction of any offense substantially related to the qualifications,
3 functions, or duties of a physician and surgeon constitutes unprofessional conduct
4 within the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record
5 of conviction shall be conclusive evidence only of the fact that the conviction
6 occurred.

7 ...

6 (d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is
7 deemed to be a conviction within the meaning of this section and Section 2236.1.
8 The record of conviction shall be conclusive evidence of the fact that the conviction
9 occurred.

10 8. Section 2239 of the Code states:

11 (a) The use or prescribing for or administering to himself or herself, of any controlled
12 substance; or the use of any of the dangerous drugs specified in Section 4022, or of
13 alcoholic beverages, to the extent, or in such a manner as to be dangerous or injurious to
14 the licensee, or to any other person or to the public, or to the extent that such use impairs
15 the ability of the licensee to practice medicine safely or more than one misdemeanor or
16 any felony involving the use, consumption, or self-administration of any of the substances
17 referred to in this section, or any combination thereof, constitutes unprofessional conduct.
18 The record of the conviction is conclusive evidence of such unprofessional conduct.

19 (b) A plea or verdict of guilty or a conviction following a plea of nolo contendere is
20 deemed to be a conviction within the meaning of this section. The Division of Medical
21 Quality may order discipline of the licensee in accordance with Section 2227 or the
22 Division of Licensing may order the denial of the license when the time for appeal has
23 elapsed or the judgment of conviction has been affirmed on appeal or when an order
24 granting probation is made suspending imposition of sentence, irrespective of a
25 subsequent order under the provisions of Section 1203.4 of the Penal Code allowing such
26 person to withdraw his or her plea of guilty and to enter a plea of not guilty, or setting
27 aside the verdict of guilty, or dismissing the accusation, complaint, information, or
28 indictment.

REGULATORY PROVISIONS

19 9. California Code of Regulations, title 16, section 1360, states:

20 (a) For the purposes of denial, suspension or revocation of a license pursuant
21 to Section 141 or Division 1.5 (commencing with Section 475) of the code, a crime,
22 professional misconduct, or act shall be considered to be substantially related to the
23 qualifications, functions or duties of a person holding a license if to a substantial
24 degree it evidences present or potential unfitness of a person holding a license to
25 perform the functions authorized by the license in a manner consistent with the public
26 health, safety or welfare. Such crimes, professional misconduct, or acts shall include
27 but not be limited to the following: Violating or attempting to violate, directly or
28 indirectly, or assisting in or abetting the violation of, or conspiring to violate any
 provision of state or federal law governing the applicant's or licensee's professional
 practice.

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(b) In making the substantial relationship determination required under subdivision (a) for a crime, the board shall consider the following criteria:

- (1) The nature and gravity of the crime;
- (2) The number of years elapsed since the date of the crime; and
- (3) The nature and duties of the profession.

COST RECOVERY

10. Business and Professions Code section 125.3 states that:

(a) Except as otherwise provided by law, in any order issued in resolution of a disciplinary proceeding before any board within the department or before the Osteopathic Medical Board upon request of the entity bringing the proceeding, the administrative law judge may 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.

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

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

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

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(2) Notwithstanding paragraph (1), the board may, in its discretion, conditionally renew or reinstate for a maximum of one year the license of any licensee who demonstrates financial hardship and who enters into a formal agreement with the board to reimburse the board within that one-year period for the unpaid costs.

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

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

(j) This section does not apply to any board if a specific statutory provision in that board's licensing act provides for recovery of costs in an administrative disciplinary proceeding.

FACTUAL ALLEGATIONS

11. On or about January 18, 2024, at approximately 12:55 a.m., a Roseville Police Department Officer (“Officer”) was on duty and traveling westbound on Vernon Street, just east of S. Grant Street. The Officer had a green light and proceeded to enter the intersection of Vernon Street and S. Grant Street. The Officer observed a Ford F-150 pick-up truck suddenly run a solid-forward facing red light and pass by the Officer’s patrol vehicle. The Officer pulled behind the pick-up truck and initiated a traffic stop.

12. The Officer approached the pick-up truck and made contact with the driver who was later identified to be Respondent. The Officer asked Respondent if he had consumed any alcohol and Respondent stated he had not been drinking. The Officer had Respondent exit the vehicle. When Respondent exited the pick-up, Respondent informed the Officer that he had in fact consumed one beer.¹ The Officer performed a driving under the influence investigation.

13. During the investigation, the Officer observed Respondent to have objective signs of intoxication: red, watery eyes; slurred speech; an unsteady gait; and, a strong odor of an alcoholic beverage emanating from Respondent's person. Respondent failed a series of field sobriety tests.

¹ On June 24, 2024, during an interview with the Board, Respondent stated he consumed three cocktails before driving during the early morning hours of January 18, 2024. Respondent blamed “fear” and “PTSD” from his 2013 driving under the influence arrest and conviction for falsely telling the officers he had consumed one beer when in fact he had consumed three cocktails.

1 The Officer had Respondent perform a preliminary alcohol screening test and Respondent
2 provided a sample that showed a blood alcohol content of 0.174% at 1:18 a.m. The Officer
3 placed Respondent under arrest. Following his arrest, Respondent agreed to provide a breath
4 sample and provided two samples of .16% at 1:29 a.m. and 1:32 a.m.

5 14. On March 26, 2024, the Placer County District Attorney's Office filed a misdemeanor
6 complaint in a case entitled *The People of the State of California vs. Amardeep Singh Bhatti*, Case
7 No. 62-197928. The misdemeanor complaint alleged that Respondent committed a violation of
8 Vehicle Code § 23152, under both subdivisions (a) and (b), and that Respondent had a blood
9 alcohol content of .15% at the time he committed the offense pursuant to Vehicle Code § 23578.
10 On April 30, 2024, Respondent entered a no contest plea in absentia to a misdemeanor violation
11 of Vehicle Code § 23152(a) and admitted the special allegation under Vehicle Code § 23578.
12 The Court noted that Respondent's blood alcohol content was .16% at the time of his arrest.

13 15. On April 30, 2024, the Court sentenced Respondent to three years' court probation
14 and imposed 28 days of either work project or electronic monitoring in lieu of jail time. The
15 Court also ordered Respondent to complete a three-month first offender driving under the
16 influence program and a "Mothers Against Drunk Driving" victim impact program. Finally,
17 Respondent was ordered to pay various fines and fees.

18 16. On or about June 21, 2024, Respondent's attorney provided a signed written
19 statement from Respondent to the Board. In the written statement, Respondent wrote that he
20 "would like the Board to know that my decision to drink and drive occurred during a time when I
21 did not have sufficient life skills or emotional fortitude to manage significant work-related
22 stress." The letter was digitally signed by Respondent on June 21, 2024, under penalty of perjury.
23 On June 24, 2024, Respondent was interviewed by the Board's investigator. The Board's
24 investigator quoted the above phrase to Respondent. Respondent affirmed that he wrote the
25 statement his attorney had provided to the Board. But Respondent denied that he had any work-
26 related or life-related stress issues. Conversely, Respondent stated that he felt the driving under
27 the influence incident occurred because of him celebrating. On June 27, 2024, Respondent's
28 attorney provided an amended written statement from Respondent to the Board. In the amended

1 written statement, Respondent wrote that he, "would like the board to know my decision to drink
2 and drive was a decision that was a complete lapse in my judgment and has no relation to my
3 ability to manage any work-related stress." The amended letter was digitally signed by
4 Respondent on June 27, 2024, under penalty of perjury.

5 **FIRST CAUSE FOR DISCIPLINE**

6 **(Conviction of a Crime)**

7 17. Respondent has subjected his license to disciplinary action under section 2227, as
8 defined by sections 2234, subdivision (a), and 2236, of the Code, in that he was convicted of a
9 crime substantially related to the qualification, functions, or duties of a physician and surgeon, as
10 more particularly alleged in paragraphs 11 through 16, which are hereby incorporated by
11 reference and realleged as if fully set forth herein.

12 **SECOND CAUSE FOR DISCIPLINE**

13 **(Use of Alcohol Dangerous to Licensee or Others)**

14 18. Respondent has subjected his license to disciplinary action under section 2227, as
15 defined by sections 2234, subdivision (a), and 2239, of the Code, in that he used alcoholic
16 beverages, to the extent and/or in such a manner as to be dangerous or injurious to the licensee, or
17 to any other person or to the public, as more particularly alleged in paragraphs 11 through 16,
18 which are hereby incorporated by reference and realleged as if fully set forth herein.

19 **DISCIPLINARY CONSIDERATIONS**

20 19. To determine the degree of discipline, if any, to be imposed on Respondent
21 Amardeep Singh Bhatti, M.D., Complainant alleges that on or about December 8, 2013, in the
22 early morning hours, Respondent was previously investigated and arrested for driving under the
23 influence. According to the certified police reports², Fremont Police Department officers
24 responded to the scene of a single vehicle accident on Niles Canyon Road involving a Mazda 6 at
25 approximately 3:15 a.m. Respondent was identified as the driver of the wrecked Mazda 6, which
26 had major damage to the front end, and was disabled in the middle of the roadway. The police

28 ² The certified Fremont police report number is Case Number 131208010.

1 report also noted that after Respondent's accident, a second vehicle was forced to swerve off the
2 roadway to avoid Respondent's disabled vehicle and went down the side of a ravine.

3 20. During the criminal investigation, Respondent failed field sobriety tests and was
4 placed under arrest. During the criminal investigation, Respondent was belligerent with officers
5 and at one point was handcuffed for officer safety. Following his arrest, Respondent provided a
6 breath sample, which revealed a Blood Alcohol Content of .17 % at approximately 4:42 a.m. On
7 June 24, 2024, the Medical Board interviewed Respondent. During the interview, Respondent
8 admitted that he was arrested on December 8, 2013, and admitted that he was later convicted of
9 misdemeanor driving under the influence. The Board requested certified conviction records from
10 the Alameda County Superior Court but the Court was unable to provide any certified records
11 related to Respondent's conviction. When Respondent sought licensure with the Board in 2020,
12 the Board lacked statutory authority to take action regarding the 2013 arrest and conviction for
13 driving under the influence.

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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:

4 1. Revoking or suspending Physician's and Surgeon's Certificate Number A 169876,
5 issued to Respondent Amardeep Singh Bhatti, M.D.;

6 2. Revoking, suspending or denying approval of Respondent Amardeep Singh Bhatti,
7 M.D.'s authority to supervise physician assistants and advanced practice nurses;

8 3. Ordering Respondent Amardeep Singh Bhatti, M.D., to pay the Medical Board of
9 California the reasonable costs of the investigation and enforcement of this case, and if placed on
10 probation, the costs of probation monitoring;

11 4. Ordering Respondent Amardeep Singh Bhatti, M.D., to provide consumer notice to
12 his patients upon a finding that he used alcohol to an extent that impairs the ability of the licensee
13 to practice safely pursuant to Bus. & Prof. Code, § 2228.1; and,

14 5. Taking such other and further action as deemed necessary and proper.

DATED: 08/8/2024

JENNA JONES FOR

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

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