

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

**In the Matter of the Accusation  
Against:**

**Ravi K. Lakkaraju, M.D.**

**Physician's and Surgeon's  
Certificate No. C 55361**

**Respondent.**

**Case No. 800-2023-098444**

**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 May 28, 2025.**

**IT IS SO ORDERED May 21, 2025.**

**MEDICAL BOARD OF CALIFORNIA**

  
\_\_\_\_\_  
**Reji Varghese, Executive Director**

1 ROB BONTA  
Attorney General of California  
2 MATTHEW M. DAVIS  
Supervising Deputy Attorney General  
3 JASON J. AHN  
Deputy Attorney General  
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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 In the Matter of the Accusation Against:

Case No. 800-2023-098444

13 **RAVI K. LAKKARAJU, M.D.**  
14 **13981 Umbria Way**  
**Poway CA 92064-2292**

OAH No. 2024120374

15 **Physician's and Surgeon's**  
16 **Certificate No. C 55361**

**STIPULATED SURRENDER OF  
LICENSE AND DISCIPLINARY ORDER**

17 Respondent.

18  
19 **IT IS HEREBY STIPULATED AND AGREED by and between the parties to the**  
20 **above-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 Jason J. Ahn, Deputy  
25 Attorney General.

26 2. Ravi K. Lakkaraju, M.D. (Respondent) is represented in this proceeding by attorney  
27 David Rosenberg, Esq., whose address is: 10815 Rancho Bernardo Road, Suite 260, San Diego,  
28 CA 92127.

3. On or about July 1, 2012, the Board issued Physician's and Surgeon's Certificate No. C 55361 to Respondent. That license was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2023-098444 and will expire on July 31, 2026, unless renewed.

## JURISDICTION

4. On November 7, 2024, Accusation No. 800-2023-098444 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 or about November 7, 2024. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 800-2023-098444 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. 800-2023-098444. Respondent also has carefully read, fully discussed with counsel, and fully understands the effects of this Stipulated Surrender of License and Disciplinary Order.

6. 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.

7. 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 does not contest that, at an administrative hearing, Complainant could  
3 establish a *prima facie* case with respect to the charges and allegations contained in Accusation  
4 No. 800-2023-098444, a copy of which is attached hereto as Exhibit A, and that he has thereby  
5 subjected his Physician's and Surgeon's Certificate No. C 55361 to disciplinary action.

6 9. Respondent agrees that if an accusation is ever filed against him before the Medical  
7 Board of California, all of the charges and allegations contained in Accusation No. 800-2023-  
8 098444 shall be deemed true, correct, and fully admitted by Respondent for purposes of that  
9 proceeding or any other licensing proceeding involving Respondent in the State of California.

10 10. Respondent agrees that his Physician's and Surgeon's Certificate No. C 55361 is  
11 subject to discipline and he agrees to be bound by the Board's imposition of discipline as set forth  
12 in the Disciplinary Order below.

13 CONTINGENCY

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

17 12. Respondent understands that, by signing this stipulation, he enables the Executive  
18 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his  
19 Physician's and Surgeon's Certificate No. C 55361 without further notice to, or opportunity to be  
20 heard by, Respondent.

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

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

## **ADDITIONAL PROVISIONS**

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

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

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ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Disciplinary Order and have fully discussed it with my attorney David Rosenberg, 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 fully agree to be bound by the Decision and Order of the Medical Board of California.

DATED: 05 / 13 / 2025

*Ravi Kiran Lakkaraju*

RAVI K. LAKKARAJU, M.D.  
*Respondent*

I have read and fully discussed with Respondent Ravi K. Lakkaraju, 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: 5/13/25

  
DAVID ROSENBERG, 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: May 14, 2025

Respectfully submitted,

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

*Jason Ahn*

JASON J. AHN  
Deputy Attorney General  
*Attorneys for Complainant*

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Stipulated Surrender of License and Order - MBC.docx



**Exhibit A**

**Accusation No. 800-2023-098444**

1 ROB BONTA  
Attorney General of California  
2 MATTHEW M. DAVIS  
Supervising Deputy Attorney General  
3 JASON J. AHN  
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E-mail: Jason.Ahn@doj.ca.gov  
8 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:

Case No. 800-2023-098444

14 **Ravi K. Lakkaraju, M.D.**  
13981 Umbria Way  
15 Poway, CA 92064-2292

**A C C U S A T I O N**

16 **Physician's and Surgeon's**  
Certificate No. C 55361,

17 Respondent.

18  
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 July 1, 2012, the Medical Board issued Physician's and Surgeon's  
25 Certificate No. C 55361 to Ravi K. Lakkaraju, 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 July 31, 2026, unless renewed.

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## 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:

(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.

(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical review or advisory conferences, professional competency examinations, continuing education activities, and cost reimbursement associated therewith that are agreed to with the board and successfully completed by the licensee, or other matters made confidential or privileged by existing law, is deemed public, and shall be made available to the public by the board pursuant to Section 803.1.

5. Section 810 of the Code states:

(a) It shall constitute unprofessional conduct and grounds for disciplinary action, including suspension or revocation of a license or certificate, for a health care professional to do any of the following in connection with their professional activities:

(1) Knowingly present or cause to be presented any false or fraudulent claim for the payment of a loss under a contract of insurance.

(2) Knowingly prepare, make, or subscribe any writing, with intent to present or use the same, or to allow it to be presented or used in support of any false or fraudulent claim.

(b) It shall constitute cause for revocation or suspension of a license or certificate for a health care professional to engage in any conduct prohibited under Section 1871.4 of the Insurance Code or Section 549 or 550 of the Penal Code.

1 (c) (1) It shall constitute cause for automatic suspension of a license or  
2 certificate issued pursuant to Chapter 4 (commencing with Section 1600), Chapter 5  
3 (commencing with Section 2000), Chapter 6.6 (commencing with Section 2900),  
4 Chapter 7 (commencing with Section 3000), or Chapter 9 (commencing with Section  
5 4000), or pursuant to the Chiropractic Act or the Osteopathic Act, if a licensee or  
6 certificate holder has been convicted of any felony involving fraud committed by the  
7 licensee or certificate holder in conjunction with providing benefits covered by  
8 worker's compensation insurance, or has been convicted of any felony involving  
9 Medi-Cal fraud committed by the licensee or certificate holder in conjunction with  
10 the Medi-Cal program, including the Denti-Cal element of the Medi-Cal program,  
11 pursuant to Chapter 7 (commencing with Section 14000), or Chapter 8 (commencing  
12 with Section 14200), of Part 3 of Division 9 of the Welfare and Institutions Code. The  
13 board shall convene a disciplinary hearing to determine whether or not the license or  
14 certificate shall be suspended, revoked, or some other disposition shall be considered,  
15 including, but not limited to, revocation with the opportunity to petition for  
16 reinstatement, suspension, or other limitations on the license or certificate as the  
17 board deems appropriate.

18 (2) It shall constitute cause for automatic suspension and for revocation of a  
19 license or certificate issued pursuant to Chapter 4 (commencing with Section 1600),  
20 Chapter 5 (commencing with Section 2000), Chapter 6.6 (commencing with Section  
21 2900), Chapter 7 (commencing with Section 3000), or Chapter 9 (commencing with  
22 Section 4000), or pursuant to the Chiropractic Act or the Osteopathic Act, if a  
23 licensee or certificate holder has more than one conviction of any felony arising out  
24 of separate prosecutions involving fraud committed by the licensee or certificate  
25 holder in conjunction with providing benefits covered by worker's compensation  
26 insurance, or in conjunction with the Medi-Cal program, including the Denti-Cal  
27 element of the Medi-Cal program pursuant to Chapter 7 (commencing with Section  
28 14000), or Chapter 8 (commencing with Section 14200), of Part 3 of Division 9 of the  
Welfare and Institutions Code. The board shall convene a disciplinary hearing to  
revoke the license or certificate and an order of revocation shall be issued unless the  
board finds mitigating circumstances to order some other disposition.

(3) It is the intent of the Legislature that paragraph (2) apply to a licensee or  
certificate holder who has one or more convictions prior to January 1, 2004, as  
provided in this subdivision.

(4) Nothing in this subdivision shall preclude a board from suspending or  
revoking a license or certificate pursuant to any other provision of law.

(5) "Board," as used in this subdivision, means the Dental Board of California,  
the Medical Board of California, the California Board of Podiatric Medicine, the  
Board of Psychology, the State Board of Optometry, the California State Board of  
Pharmacy, the Osteopathic Medical Board of California, and the State Board of  
Chiropractic Examiners.

(6) "More than one conviction," as used in this subdivision, means that the  
licensee or certificate holder has one or more convictions prior to January 1, 2004,  
and at least one conviction on or after that date, or the licensee or certificate holder  
has two or more convictions on or after January 1, 2004. However, a licensee or  
certificate holder who has one or more convictions prior to January 1, 2004, but who  
has no convictions and is currently licensed or holds a certificate after that date, does  
not have "more than one conviction" for the purposes of this subdivision.

(d) As used in this section, health care professional means any person licensed  
or certified pursuant to this division, or licensed pursuant to the Osteopathic Initiative

Act, or the Chiropractic Initiative Act.

6. Section 2236 of the Code states:

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

(b) The district attorney, city attorney, or other prosecuting agency shall notify the Medical Board of the pendency of an action against a licensee charging a felony or misdemeanor immediately upon obtaining information that the defendant is a licensee. The notice shall identify the licensee and describe the crimes charged and the facts alleged. The prosecuting agency shall also notify the clerk of the court in which the action is pending that the defendant is a licensee, and the clerk shall record prominently in the file that the defendant holds a license as a physician and surgeon.

(c) The clerk of the court in which a licensee is convicted of a crime shall, within 48 hours after the conviction, transmit a certified copy of the record of conviction to the board. The division may inquire into the circumstances surrounding the commission of a crime in order to fix the degree of discipline or to determine if the conviction is of an offense substantially related to the qualifications, functions, or duties of a physician and surgeon.

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

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

(a) For the purposes of denial, suspension or revocation of a license pursuant to Section 141 or Division 1.5 (commencing with Section 475) of the code, a crime, professional misconduct, or act shall be considered to be substantially related to the qualifications, functions or duties of a person holding a license if to a substantial degree it evidences present or potential unfitness of a person holding a license to perform the functions authorized by the license in a manner consistent with the public health, safety or welfare. Such crimes, professional misconduct, or acts shall include but not be limited to the following: Violating or attempting to violate, directly or 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.

(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.

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

#### 6                                   COST RECOVERY

7           9. Section 125.3 of the Code states:

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

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

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

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

### **FIRST CAUSE FOR DISCIPLINE**

#### **(Conviction of a Crime Substantially Related to the Qualifications, Functions, or Duties of a Physician and Surgeon)**

10. Respondent has subjected his Physician's and Surgeon's Certificate No. C 55361 to disciplinary action under sections 2227 and 2234, as defined by section 2236, subdivision (a), of the Code, in that Respondent has been convicted of a crime substantially related to the qualifications, functions, or duties of a physician and surgeon, as more particularly alleged hereinafter:

11. On or about November 9, 2023, Respondent entered into a plea agreement in criminal case number CD299088, in the Superior Court of California, County of San Diego. Respondent pled guilty, to count 1 of the felony complaint, reduced to a misdemeanor, pursuant to Penal Code section 17(b), as follows:

#### **"GRAND THEFT OF PERSONAL PROPERTY**

On or about and between October 1, 2014<sup>1</sup> and December 31, 2014, Ravi Kiran Lakkaraju (Respondent) did unlawfully take and steal money and personal property of Standard Insurance Company by False Pretense, of a value in excess of Nine Hundred Fifty Dollars (\$950), to wit: monthly benefits paid during the alleged date range, in violation of [California] PENAL CODE SECTION 487(a) . . ."

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<sup>1</sup> Conduct occurring more than seven (7) years from the filing date of this Accusation is for informational purposes only and is not alleged as a basis for disciplinary action.

12. In essence, Respondent knew, at the time he applied for a disability insurance policy with Standard Insurance Company, that Respondent had a disqualifying, pre-existing condition, muscular dystrophy. Based on this omission of a material fact, Standard Insurance Company approved the policy and made payments to Respondent from on or about October 1, 2014 through on or about April 30, 2020.

13. On or about November 9, 2023, in criminal case number CD299088, in the Superior Court of California, County of San Diego, Respondent was sentenced to, among other things, six (6) months of summary probation, various fines and fees, and a restitution of one hundred twenty-nine thousand dollars (\$129,000.00).

## SECOND CAUSE FOR DISCIPLINE

**(Dishonesty or Corruption)**

14. Respondent has further subjected his Physician's and Surgeon's Certificate No. C 55361 to disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (e), of the Code, in that he has committed an act or acts of dishonesty or corruption, as more particularly alleged in paragraphs 10 through 13, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

### THIRD CAUSE FOR DISCIPLINE

**(Revocation or Suspension of License Based on Insurance Fraud and Worker's Compensation Fraud)**

15. Respondent has further subjected his Physician's and Surgeon's Certificate No. C 55361 to disciplinary action under sections 2227 and 2234, as defined by section 810, subdivisions (b) and (c)(1), of the Code, in that he has committed insurance fraud and worker's compensation fraud, as more particularly alleged in paragraphs 10 through 13, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

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1 **FOURTH CAUSE FOR DISCIPLINE**

2 **(General Unprofessional Conduct)**

3 16. Respondent has further subjected his Physician's and Surgeon's Certificate No.  
4 C 55361 to disciplinary action under sections 2227 and 2234, as defined by section 2234, of the  
5 Code, in that he has engaged in conduct which breaches the rules or ethical code of the medical  
6 profession, or conduct which is unbecoming a member in good standing of the medical  
7 profession, and which demonstrates an unfitness to practice medicine, as more particularly  
8 alleged in paragraphs 10 through 15, above, which are hereby incorporated by reference and  
9 realleged as if fully set forth herein.

10 **PRAYER**

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

- 13 1. Revoking or suspending Physician's and Surgeon's Certificate No. C 55361, issued to  
14 Respondent Ravi K. Lakkaraju, M.D.;
- 15 2. Revoking, suspending or denying approval of Respondent Ravi K. Lakkaraju, M.D.'s  
16 authority to supervise physician assistants and advanced practice nurses;
- 17 3. Ordering Respondent Ravi K. Lakkaraju, M.D., to pay the Board the costs of the  
18 investigation and enforcement of this case, and if placed on probation, the costs of probation  
19 monitoring; and
- 20 4. Taking such other and further action as deemed necessary and proper.

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22  
23 DATED: NOV 07 2024

24 JENNA JONES FOR  
25 REJI VARGHESE  
26 Executive Director  
27 Medical Board of California  
28 Department of Consumer Affairs  
State of California  
Complainant

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