

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

In the Matter of the Accusation Against:

Parto Karimi, M.D.

Physician's and Surgeon's  
Certificate No. C 50315

Respondent.

Case No. 800-2023-098750

**DECISION**

The attached Stipulated Surrender of License and 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 June 17, 2025.

IT IS SO ORDERED June 10, 2025.

MEDICAL BOARD OF CALIFORNIA

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

ROB BONTA  
Attorney General of California  
MACHAELA M. MINGARDI  
Supervising Deputy Attorney General  
HAY-MIE CHO  
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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. 800-2023-098750

**PARTO KARIMI, M.D.  
3157 MIRANDA AVE.  
ALAMO, CA 94507**

OAH No.

**Physician's and Surgeon's Certificate No. C  
50315**

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

**Respondent.**

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

## **PARTIES**

1. Reji Varghese (Complainant) is the Executive Director of the Medical Board of California (Board). He brought this action solely in his official capacity and is represented in this matter by Rob Bonta, Attorney General of the State of California, by Hay-Mie Cho, Deputy Attorney General.

2. PARTO KARIMI, M.D. (Respondent) is represented in this proceeding by attorney Michael A. Firestone J.D., whose address is: 1700 South El Camino Real, Suite 408, San Mateo, CA 94402-3050.

3. On or about October 8, 1999, the Board issued Physician's and Surgeon's Certificate No. C 50315 to Respondent. That license was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2023-098750 and expired on April 30, 2025.

## **JURISDICTION**

4. Accusation No. 800-2023-098750 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 July 23, 2024. Respondent ultimately filed a Notice of Defense contesting the Accusation. A copy of Accusation No. 800-2023-098750 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. 800-2023-098750. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Order.

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

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

## **CULPABILITY**

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 800-2023-098750, agrees that cause exists for discipline and hereby surrenders her Physician's and Surgeon's Certificate No. C 50315 for the Board's formal acceptance.

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

## CONTINGENCY

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

11. Respondent understands that, by signing this stipulation, she enables the Executive Director of the Board to issue an order, on behalf of the Board, accepting the surrender of her Physician's and Surgeon's Certificate No. C 50315 without further notice to, or opportunity to be heard by, Respondent.

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

13. 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

1 Executive Director on behalf of the Board does not, in his discretion, approve and adopt this  
2 Stipulated Surrender of License and Disciplinary Order, with the exception of this paragraph, it  
3 shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied  
4 upon or introduced in any disciplinary action by either party hereto. Respondent further agrees  
5 that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason  
6 by the Executive Director on behalf of the Board, Respondent will assert no claim that the  
7 Executive Director, the Board, or any member thereof, was prejudiced by its/his/her review,  
8 discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or  
9 of any matter or matters related hereto.

10 **ADDITIONAL PROVISIONS**

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

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

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

20 **ORDER**

21 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. C 50315, issued  
22 to Respondent PARTO KARIMI, M.D., is surrendered and accepted by the Board.

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

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

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

3       4. If Respondent ever files an application for licensure or a petition for reinstatement in  
4 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
5 comply with all the laws, regulations and procedures for reinstatement of a revoked or  
6 surrendered license in effect at the time the petition is filed, and all of the charges and allegations  
7 contained in Accusation No. 800-2023-098750 shall be deemed to be true, correct and admitted  
8 by Respondent when the Board determines whether to grant or deny the petition.

9       5. Respondent shall pay the agency its costs of investigation and enforcement in the  
10 amount of \$17,361.75 prior to issuance of a new or reinstated license.

11       6. If Respondent should ever apply or reapply for a new license or certification, or  
12 petition for reinstatement of a license, by any other health care licensing agency in the State of  
13 California, all of the charges and allegations contained in Accusation No. 800-2023-098750 shall  
14 be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
15 Issues or any other proceeding seeking to deny or restrict licensure.

16       ACCEPTANCE

17       I have carefully read the above Stipulated Surrender of License and Order and have fully  
18 discussed it with my attorney, Michael A. Firestone J.D. I understand the stipulation and the  
19 effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated  
20 Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound  
21 by the Decision and Order of the Medical Board of California.

22

23

DATED: 6/4/25



PARTO KARIMI, M.D.  
Respondent

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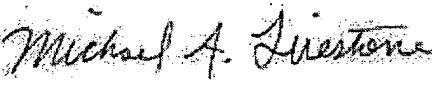
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1 I have read and fully discussed with Respondent PARTO KARIMI, M.D. the terms and  
2 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
3 approve its form and content.

4 DATED: June 4, 2025

5   
MICHAEL A. FIRESTONE J.D.  
6 Attorney for Respondent

7 **ENDORSEMENT**

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

10 DATED: June 5, 2025

11 Respectfully submitted,

12 ROB BONTA  
13 Attorney General of California  
14 MACHAELA M. MINGARDI  
15 Supervising Deputy Attorney General

16   
17 HAY-MIE CHO  
18 Deputy Attorney General  
19 Attorneys for Complainant

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**Exhibit A**

**Accusation No. 800-2023-098750**

1 ROB BONTA  
2 Attorney General of California  
3 MACHAELA M. MINGARDI  
Supervising Deputy Attorney General  
4 C. HAY-MIE CHO  
Deputy Attorney General  
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*Attorneys for Complainant*

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

11

12 In the Matter of the Accusation Against:

Case No. 800-2023-098750

13 **PARTO KARIMI, M.D.**  
14 3157 Miranda Ave.  
Alamo, CA 94507

**ACCUSATION**

15 **Physician's and Surgeon's Certificate**  
16 **No. C 50315,**

17 Respondent.

18

19

**PARTIES**

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

23 2. On or about October 8, 1999, the Medical Board issued Physician's and Surgeon's  
24 Certificate Number C 50315 to Parto Karimi, M.D. (Respondent). The Physician's and Surgeon's  
25 Certificate was in full force and effect at all times relevant to the charges brought herein and will  
26 expire on April 30, 2025, unless renewed.

27

28

1

**JURISDICTION**

2       3. This Accusation is brought before the Board, under the authority of the following  
3 laws. All section references are to the Business and Professions Code (Code) unless otherwise  
4 indicated.

5       4. Section 2004 of the Code provides that the Board shall have the responsibility for the  
6 enforcement of the disciplinary and criminal provisions of the Medical Practice Act.

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

11      6. Section 2234 of the Code, states:

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

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

16       (b) Gross negligence.

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

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

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

24       (d) Incompetence.

25       (e) The commission of any act involving dishonesty or corruption that is  
26 substantially related to the qualifications, functions, or duties of a physician and  
surgeon.

27       (f) Any action or conduct that would have warranted the denial of a certificate.

28       (g) The failure by a certificate holder, in the absence of good cause, to attend

1 and participate in an interview by the board no later than 30 calendar days after being  
2 notified by the board. This subdivision shall only apply to a certificate holder who is  
3 the subject of an investigation by the board.  
4

5 (h) Any action of the licensee, or another person acting on behalf of the  
6 licensee, intended to cause their patient or their patient's authorized representative to  
7 rescind consent to release the patient's medical records to the board or the  
8 Department of Consumer Affairs, Health Quality Investigation Unit.  
9

10 (i) Dissuading, intimidating, or tampering with a patient, witness, or any person  
11 in an attempt to prevent them from reporting or testifying about a licensee.  
12

13 7. Section 2236 of the Code states:  
14

15 (a) The conviction of any offense substantially related to the qualifications,  
16 functions, or duties of a physician and surgeon constitutes unprofessional conduct  
17 within the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record  
18 of conviction shall be conclusive evidence only of the fact that the conviction  
19 occurred.  
20

21 (b) The district attorney, city attorney, or other prosecuting agency shall notify  
22 the Medical Board of the pendency of an action against a licensee charging a felony  
23 or misdemeanor immediately upon obtaining information that the defendant is a  
24 licensee. The notice shall identify the licensee and describe the crimes charged and  
25 the facts alleged. The prosecuting agency shall also notify the clerk of the court in  
26 which the action is pending that the defendant is a licensee, and the clerk shall record  
27 prominently in the file that the defendant holds a license as a physician and surgeon.  
28

29 (c) The clerk of the court in which a licensee is convicted of a crime shall,  
30 within 48 hours after the conviction, transmit a certified copy of the record of  
31 conviction to the board. The division may inquire into the circumstances surrounding  
32 the commission of a crime in order to fix the degree of discipline or to determine if  
33 the conviction is of an offense substantially related to the qualifications, functions, or  
34 duties of a physician and surgeon.  
35

36 (d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is  
37 deemed to be a conviction within the meaning of this section and Section 2236.1.  
38 The record of conviction shall be conclusive evidence of the fact that the conviction  
39 occurred.  
40

41 8. California Code of Regulations, title 16, section 1360, states:  
42

43 (a) For the purposes of denial, suspension or revocation of a license pursuant to  
44 Section 141 or Division 1.5 (commencing with Section 475) of the code, a crime,  
45 professional misconduct, or act shall be considered to be substantially related to the  
46 qualifications, functions or duties of a person holding a license if to a substantial  
47 degree it evidences present or potential unfitness of a person holding a license to  
48 perform the functions authorized by the license in a manner consistent with the public  
49 health, safety or welfare. Such crimes, professional misconduct, or acts shall include  
50 but not be limited to the following: Violating or attempting to violate, directly or  
51 indirectly, or assisting in or abetting the violation of, or conspiring to violate any  
52 provision of state or federal law governing the applicant's or licensee's professional  
53 practice.  
54

55 (b) In making the substantial relationship determination required under  
56 subdivision (a) for a crime, the board shall consider the following criteria:  
57

- (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**

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

## **FACTUAL ALLEGATIONS**

12        10. Between January 2017 and October 2020, Respondent traded medical prescriptions  
13 for street drugs, including cocaine, methamphetamine, psychedelic mushrooms, and marijuana;  
14 issued unnecessary medical prescriptions in exchange for cash payments; wrote opioid  
15 prescriptions to undercover agents after conducting little to no physical examinations and without  
16 considering alternative treatment options; and failed to maintain patient medical records.

17        11. On or about February 15, 2023, based on the aforementioned facts in Paragraph 10,  
18 Respondent was indicted for Distribution of a Controlled Substance in violation of 21 U.S.C. §  
19 841(a)(1).

20       12. On or about March 19, 2024, in a federal criminal proceeding entitled, *United States*  
21 *of America v. Parto Karimi*, N.D. Cal. Case No. 4:23-cv-00055-JST, Respondent was convicted  
22 of a felony by pleading guilty to Distributing Hydrocodone Outside the Scope of Professional  
23 Practice, a violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

24       13. Respondent was sentenced to one year and one day in prison, to be followed by three  
25 years of supervised release. Respondent was also ordered to pay a \$4,000 fine and to forfeit her  
26 medical license.

## **FIRST CAUSE FOR DISCIPLINE**

**(Criminal Conviction)**

14. The allegations set forth in Paragraphs 10 through 13 are incorporated by reference as if fully set out herein.

5       15. By reason of the facts stated in Paragraphs 10 through 13 above, Respondent is  
6       subject to disciplinary action under section 2236 (criminal conviction) of the Code and California  
7       Code of Regulations, title 16, section 1360 (criminal conviction) because on or about March 19,  
8       2024, in a federal criminal proceeding entitled, *United States of America v. Paroto Karimi*, N.D.  
9       Cal. Case No. 4:23-cv-00055-JST, Respondent was convicted of a felony by pleading guilty to  
10      Distributing Hydrocodone Outside the Scope of Professional Practice, in violation of U.S.C. §  
11      841(a)(1) and (b)(1)(C).

12        16. Respondent is subject to disciplinary action under section 2236 of the Code because  
13 she pleaded guilty to the federal crime of Distributing Hydrocodone Outside the Scope of  
14 Professional Practice, and this conviction is substantially related to the qualifications, functions,  
15 and duties of a physician and surgeon.

## **SECOND CAUSE FOR DISCIPLINE**

### **(Unprofessional Conduct – Commission of Act of Dishonesty)**

18        17. The allegations set forth in Paragraphs 10 through 13 are incorporated by reference as  
19 if fully set out herein.

20        18. By reason of the facts stated in Paragraphs 10 through 13 above, Respondent is  
21        subject to disciplinary action under section 2234 (unprofessional conduct) and/or 2234(e)  
22        (commission of acts of dishonesty), because she traded medical prescriptions for street drugs,  
23        issued unnecessary medical prescriptions in exchange for cash payments, and wrote opioid  
24        prescriptions to undercover agents after conducting little to no physical examinations and without  
25        considering alternative treatment options.

## PRAYER

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

1        1. Revoking or suspending Physician's and Surgeon's Certificate Number C 50315,  
2 issued to Parto Karimi, M.D.;

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

5        3. Ordering Parto Karimi, M.D., to pay the Board the costs of the investigation and  
6 enforcement of this case, and if placed on probation, the costs of probation monitoring;

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

8  
9        DATED: JUL 23 2024

*Reji Varghese*

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

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