

**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**

Case No. 800-2023-098750

Respondent.

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

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

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

12 In the Matter of the Accusation Against:

Case No. 800-2023-098750

13 **PARTO KARIMI, M.D.**
14 **3157 MIRANDA AVE.**
15 **ALAMO, CA 94507**

OAH No.

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

16 **Physician's and Surgeon's Certificate No. C**
17 **50315**

Respondent.

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

20 **PARTIES**

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

25 2. PARTO KARIMI, M.D. (Respondent) is represented in this proceeding by attorney
26 Michael A. Firestone J.D., whose address is: 1700 South El Camino Real, Suite 408, San Mateo,
27 CA 94402-3050.
28

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

4 **JURISDICTION**

5 4. Accusation No. 800-2023-098750 was filed before the Board and is currently pending
6 against Respondent. The Accusation and all other statutorily required documents were properly
7 served on Respondent on July 23, 2024. Respondent ultimately filed a Notice of Defense
8 contesting the Accusation. A copy of Accusation No. 800-2023-098750 is attached as Exhibit A
9 and incorporated by reference.

10 **ADVISEMENT AND WAIVERS**

11 5. Respondent has carefully read, fully discussed with counsel, and understands the
12 charges and allegations in Accusation No. 800-2023-098750. Respondent also has carefully read,
13 fully discussed with counsel, and understands the effects of this Stipulated Surrender of License
14 and Order.

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

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

23 **CULPABILITY**

24 8. Respondent admits the truth of each and every charge and allegation in Accusation
25 No. 800-2023-098750, agrees that cause exists for discipline and hereby surrenders her
26 Physician's and Surgeon's Certificate No. C 50315 for the Board's formal acceptance.
27
28

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

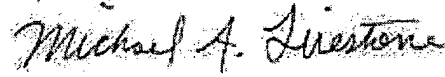
17 I have carefully read the above Stipulated Surrender of License and Order and have fully
18 discussed it with my attorney, Michael A. Firestone J.D. I understand the stipulation and the
19 effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated
20 Surrender of 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

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
5 DATED: June 4, 2025



MICHAEL A. FIRESTONE J.D.
Attorney for Respondent

7
8 **ENDORSEMENT**

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

11 DATED: June 5, 2025

Respectfully submitted,

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



16 HAY-MIE CHO
17 Deputy Attorney General
18 *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
4 Supervising Deputy Attorney General
5 C. HAY-MIE CHO
6 Deputy Attorney General
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10 Telephone: (415) 510-4433
11 Facsimile: (415) 703-5480
12 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

Case No. 800-2023-098750

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

ACCUSATION

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

Respondent.

18 **PARTIES**

19
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

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

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

6. Section 2234 of the Code, states:

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

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

(b) Gross negligence.

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

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

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

(d) Incompetence.

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

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

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

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

10 7. Section 2236 of the Code states:

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

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

23 (c) The clerk of the court in which a licensee is convicted of a crime shall,
24 within 48 hours after the conviction, transmit a certified copy of the record of
25 conviction to the board. The division may inquire into the circumstances surrounding
26 the commission of a crime in order to fix the degree of discipline or to determine if
27 the conviction is of an offense substantially related to the qualifications, functions, or
28 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.

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

4 **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.

11 **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.

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Criminal Conviction)**

3 14. The allegations set forth in Paragraphs 10 through 13 are incorporated by reference as
4 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. Parto 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.

16 **SECOND CAUSE FOR DISCIPLINE**

17 **(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.

26 **PRAYER**

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

1 1. Revoking or suspending Physician's and Surgeon's Certificate 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

for

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

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