

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

In the Matter of the Accusation Against:

**Qasem M. Noori, M.D.**

**Physician's and Surgeon's  
Certificate No. A 72911**

**Case No. 800-2023-095217**

**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 September 16, 2025.**

**IT IS SO ORDERED September 9, 2025.**

**MEDICAL BOARD OF CALIFORNIA**



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**Reji Varghese  
Executive Director**

1 ROB BONTA  
2 Attorney General of California  
3 MICHAEL C. BRUMMEL  
4 Supervising Deputy Attorney General  
5 MEGAN R. O'CARROLL  
6 Deputy Attorney General  
7 State Bar No. 215479  
8 1300 I Street, Suite 125  
9 P.O. Box 944255  
10 Sacramento, CA 94244-2550  
11 Telephone: (916) 210-7543  
12 Facsimile: (916) 327-2247  
13 E-mail: Megan.OCarroll@doj.ca.gov  
14 *Attorneys for Complainant*

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

In the Matter of the Accusation Against:

Case No. 800-2023-095217

QASEM M. NOORI, M.D.  
3941 Park Dr Ste 20-286  
El Dorado Hills, CA 95762-4549

OAH No. 2025050343

Physician's and Surgeon's Certificate  
No. A 72911

**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 Megan R. O'Carroll, Deputy Attorney General.

2. Qasem M. Noori, M.D. (Respondent) is representing himself in this proceeding and has chosen not to exercise his right to be represented by counsel.

1       3. On or about August 24, 2000, the Board issued Physician's and Surgeon's Certificate  
2 No. A 72911 to Respondent. That license was in full force and effect at all times relevant to the  
3 charges brought in Accusation No. 800-2023-095217 and will expire on January 31, 2026, unless  
4 renewed.

## **JURISDICTION**

6       4.     Accusation No. 800-2023-095217 was filed before the Board and is currently pending  
7 against Respondent. The Accusation and all other statutorily required documents were properly  
8 served on Respondent on March 28, 2025. Respondent timely filed his Notice of Defense  
9 contesting the Accusation. A copy of Accusation No. 800-2023-095217 is attached as Exhibit A  
10 and incorporated by reference.

## **ADVISEMENT AND WAIVERS**

12 5. Respondent has carefully read and understands the charges and allegations in  
13 Accusation No. 800-2023-095217. Respondent also has carefully read and understands the  
14 effects of this Stipulated Surrender of License and Order.

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

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

## **CULPABILITY**

25       8.    Respondent understands that the charges and allegations in Accusation No. 800-2023-  
26 095217, if proven at a hearing, constitute cause for imposing discipline upon his Physician's and  
27 Surgeon's Certificate.

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1        9. For the purpose of resolving the Accusation without the expense and uncertainty of  
2 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual  
3 basis for the charges in the Accusation and that those charges constitute cause for discipline.  
4 Respondent hereby gives up his right to contest that cause for discipline exists based on those  
5 charges.

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

## RESERVATION

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

## **CONTINGENCY**

12. 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.”

18        13. Respondent understands that, by signing this stipulation, he enables the Executive  
19 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his  
20 Physician's and Surgeon's Certificate No. A 72911 without further notice to, or opportunity to be  
21 heard by, Respondent.

22        14. This Stipulated Surrender of License and Disciplinary Order shall be subject to the  
23 approval of the Executive Director on behalf of the Board. The parties agree that this Stipulated  
24 Surrender of License and Disciplinary Order shall be submitted to the Executive Director for his  
25 consideration in the above-entitled matter and, further, that the Executive Director shall have a  
26 reasonable period of time in which to consider and act on this Stipulated Surrender of License and  
27 Disciplinary Order after receiving it. By signing this stipulation, Respondent fully understands

1 and agrees that he may not withdraw his agreement or seek to rescind this stipulation prior to the  
2 time the Executive Director, on behalf of the Medical Board, considers and acts upon it.

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

## **ADDITIONAL PROVISIONS**

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

17. 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.

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

## **ORDER**

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 72911, issued to Respondent Qasem M. Noori, M.D., is surrendered and accepted by the Board.

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

11       2. Respondent shall lose all rights and privileges as a Physician and Surgeon in  
12 California as of the effective date of the Board's Decision and Order.

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

15       4. If Respondent ever files an application for licensure or a petition for reinstatement in  
16 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
17 comply with all the laws, regulations and procedures for reinstatement of a revoked or  
18 surrendered license in effect at the time the petition is filed, and all of the charges and allegations  
19 contained in Accusation No. 800-2023-095217 shall be deemed to be true, correct and admitted  
20 by Respondent when the Board determines whether to grant or deny the petition.

21       5. If Respondent should ever apply or reapply for a new license or certification, or  
22 petition for reinstatement of a license, by any other health care licensing agency in the State of  
23 California, all of the charges and allegations contained in Accusation No. 800-2023-095217 shall  
24 be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
25 Issues or any other proceeding seeking to deny or restrict licensure.

26       6.     Respondent shall pay the agency its costs of investigation and enforcement in the  
27 amount of \$48,451.00 prior to issuance of a new or reinstated license.

1       7. Pursuant to of Business and Professions Code section 2307, subdivision (b)(1), the  
2 parties agree that Respondent may petition the Board no sooner than three (3) years from the  
3 effective date of the decision and order in Case No. 800-2023-095217 for reinstatement of his  
4 license. .

## **ACCEPTANCE**

6 I have carefully read the Stipulated Surrender of License and Order. I understand the  
7 stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into  
8 this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and  
9 agree to be bound by the Decision and Order of the Medical Board of California.

11 DATED: 06/24/2025

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QASEM M. NOORI, M.D.  
*Respondent*

## **ENDORSEMENT**

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

17 DATED:

Respectfully submitted,

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

6/30/2025

MEGAN R. O'CARROLL  
Deputy Attorney General  
*Attorneys for Complainant*

SA2024300231

**Exhibit A**

**Accusation No. 800-2023-095217**

1 ROB BONTA  
2 Attorney General of California  
3 MICHAEL C. BRUMMEL  
Supervising Deputy Attorney General  
4 MEGAN R. O'CARROLL  
Deputy Attorney General  
State Bar No. 215479  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
Telephone: (916) 210-7543  
Facsimile: (916) 327-2247  
E-mail: Megan.OCarroll@doj.ca.gov

*Attorneys for Complainant*

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

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13

In the Matter of the Accusation Against:

Case No. 800-2023-095217

14

Qasem M. Noori, M.D.  
3941 Park Dr Ste 20-286  
El Dorado Hills, CA 95762-4549

OAH No.

15

**ACCUSATION**

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Physician's and Surgeon's Certificate  
No. A 72911,

Respondent.

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**PARTIES**

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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).

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2. On or about August 24, 2000, the Medical Board issued Physician's and Surgeon's Certificate Number A 72911 to Qasem M. Noori, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought herein and will expire on January 31, 2026, unless renewed.

3. On or about March 6, 2025, the Office of Administrative Hearings issued an Interim  
Order of Suspension, suspending Physician's and Surgeon's Certificate Number A 72911 issued  
to Respondent pending resolution of the Accusation in this matter.

## JURISDICTION

4. 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.

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

12 6. Section 820 of the Code states:

13 Whenever it appears that any person holding a license, certificate or permit  
14 under this division or under any initiative act referred to in this division may be  
15 unable to practice his or her profession safely because the licentiate's ability to  
16 practice is impaired due to mental illness, or physical illness affecting competency,  
the licensing agency may order the licentiate to be examined by one or more  
physicians and surgeons or psychologists designated by the agency. The report of the  
examiners shall be made available to the licentiate and may be received as direct  
evidence in proceedings conducted pursuant to Section 822.

7. Section 821 of the Code provides that the licentiate's failure to comply with an order  
18 issued under section 820 shall constitute grounds for the suspension or revocation of the  
19 licentiate's certificate or license.

20 8. Section 822 of the Code states:

If a licensing agency determines that its licensee's ability to practice his or her profession safely is impaired because the licensee is mentally ill, or physically ill affecting competency, the licensing agency may take action by any one of the following methods:

- 24 (a) Revoking the licentiate's certificate or license.
- 25 (b) Suspending the licentiate's right to practice.
- 26 (c) Placing the licentiate on probation.
- 27 (d) Taking such other action in relation to the licentiate as the licensing agency  
in its discretion deems proper.

The licensing section shall not reinstate a revoked or suspended certificate or license until it has received competent evidence of the absence or control of the condition which caused its action and until it is satisfied that with due regard for the public health and safety the person's right to practice his or her profession may be safely reinstated.

9. 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.

3

(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.

• 4 •

10. Section 2239 of the Code states:

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

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

11. Section 2228.1 of the Code states.

(a) On and after July 1, 2019, except as otherwise provided in subdivision (c), the board and the Podiatric Medical Board of California shall require a licensee to provide a separate disclosure that includes the licensee's probation status, the length of the probation, the probation end date, all practice restrictions placed on the licensee by the board, the board's telephone number, and an explanation of how the patient can find further information on the licensee's probation on the licensee's profile page.

1 on the board's online license information internet web site, to a patient or the  
2 patient's guardian or health care surrogate before the patient's first visit following the  
3 probationary order while the licensee is on probation pursuant to a probationary order  
4 made on and after July 1, 2019, in any of the following circumstances:

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

8 (A) The commission of any act of sexual abuse, misconduct, or relations with a  
9 patient or client as defined in Section 726 or 729.

10 (B) Drug or alcohol abuse directly resulting in harm to patients or the extent  
11 that such use impairs the ability of the licensee to practice safely.

12 (C) Criminal conviction directly involving harm to patient health.

13 (D) Inappropriate prescribing resulting in harm to patients and a probationary  
14 period of five years or more.

15 (2) An accusation or statement of issues alleged that the licensee committed any  
16 of the acts described in subparagraphs (A) to (D), inclusive, of paragraph (1), and a  
17 stipulated settlement based upon a *nolo contendre* or other similar compromise that  
18 does not include any *prima facie* showing or admission of guilt or fact but does  
19 include an express acknowledgment that the disclosure requirements of this section  
20 would serve to protect the public interest.

21 ...

#### **COST RECOVERY**

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

#### **FACTUAL ALLEGATIONS**

28 13. Respondent is Board certified in anesthesiology. He was working as an  
anesthesiologist at Mercy General Hospital (Mercy), on Monday, January 9, 2023. He was the  
assigned anesthesiologist for an open-heart surgery in the morning, and a second open-heart  
surgery in the afternoon of January 9, 2023. During the second open-heart surgery, Respondent's  
supervisor, Dr. S., the Acting Chief of Anesthesiology, came to check on Respondent and to offer  
to provide him with a break. When Dr. S. entered the cardiac operating room, he observed

1 Respondent with his foot elevated against a warming machine, holding a syringe, and appearing  
2 to be about to inject himself in the ankle with the syringe. This was extremely unusual, and Dr. S.  
3 was very concerned about what he had observed Respondent doing. Respondent saw Dr. S.  
4 observing him, and immediately removed the needle and began administering the syringe to the  
5 patient. Dr. S. asked Respondent if there was any problem, and Respondent said that everything  
6 was okay, and that the patient required the medication in the syringe. Respondent told Dr. S. that  
7 the medication in the syringe was a narcotic, but Dr. S. cannot recall if Respondent identified the  
8 specific narcotic. Respondent declined Dr. S.'s offer to be relieved. Dr. S. remained in the  
9 cardiac operating room observing Respondent and monitoring the patient to ensure the patient  
10 was receiving adequate anesthesia care. Dr. S. planned to address the issue the following  
11 morning once he had time to consider what he observed and to form a plan of action.

12        14. Later that evening on January 9, 2023, at approximately 8:30 p.m. Respondent was  
13        found, unresponsive, on the ground, in the Mercy parking lot. A syringe of fentanyl was located  
14        in Respondent's pocket. Respondent was admitted to the Mercy Emergency Room and stabilized.  
15        Once Respondent was stabilized, another physician met with Respondent and asked him to  
16        submit to toxicology screening. Respondent refused to submit to the toxicology screening.

17       15. Dr. B., the Department Chair of Anesthesiology for Mercy, spoke to Respondent by  
18 phone on January 11, 2023, at approximately noon. Dr. B. asked Respondent to release the  
19 records of his Emergency Room treatment on January 9, 2023, and Respondent refused. Dr. B.  
20 asked Respondent if he used opioids, and Respondent stated that he was at a party the previous  
21 weekend where he consumed unidentified pills and a lot of alcohol. Dr. B. asked Respondent if  
22 he ever injected himself with opioids. Respondent denied this. Dr. B. asked Respondent why  
23 there was a syringe of fentanyl in his pocket on the evening of January 9, 2023, after he left the  
24 hospital. Respondent stated that he was using that in his duties as an anesthesiologist that day and  
25 forgot that it was in his pocket when he left the building. Mercy opened an investigation into  
26 Respondent's conduct, but Respondent resigned before the investigation could be completed.

27        16. On or about March 28, 2023, Investigators working on behalf of the Board  
28 interviewed Respondent and asked him to voluntarily participate in an examination and release

1 his medical records to determine if he suffers from a medical or mental illness affecting his  
2 competency to practice medicine. Respondent refused to do so. Therefore, on November 16,  
3 2023, the Board issued an order requiring Respondent to undergo an evaluation under Business  
4 and Professions Code section 820, and to sign a release for all records the evaluator deemed  
5 necessary to complete the evaluation.

6 17. Following the order directing Respondent to undergo a mental evaluation,  
7 Respondent participated in interview with a Board-appointed addiction specialist on December 4,  
8 2023. During the interview the addiction specialist determined that Respondent's medical records  
9 from January 9, 2023, Mercy Emergency Room visit were necessary to complete the evaluation.  
10 Despite the Business and Profession Code section 820 Order, however, Respondent refused to  
11 release his medical records from the January 9, 2023, Mercy Emergency Room visit. The  
12 addiction specialist concluded that, based on the evidence that Respondent was using controlled  
13 substances, and his refusal to permit a full evaluation with medical records from the incident in  
14 which he was found collapsed with a syringe of fentanyl, Respondent is suffering from a medical  
15 or mental condition that prevents him from practicing medicine safely.

16 18. Following Respondent's voluntary resignation of employment and privileges,  
17 Mercy's pharmacy staff investigated Respondent use of medications in his practice. Generally,  
18 Anesthesiologists administer IV controlled substances, including opioids and anxiolytics, in doses  
19 that are measured in milliliters. The number of milliliters of IV medication a patient requires is  
20 determined by the anesthesiologist based on factors such as the patient's age, weight, and medical  
21 history, among other factors. This results in dosages that are represented by mixed decimal  
22 numbers, such as 4.2 ml, or 3.8 ml. The IV medication, however, is packaged in units of whole  
23 milliliters, such as 5.0 ml, or 3.0 ml. Therefore, if the appropriate dose of medication for a patient  
24 is 3.4 ml, the anesthesiologist would obtain a vial that contains 4.0 ml, and the unused portion, in  
25 this case 0.6 ml, would be disposed of as waste. Mercy has policies in place to monitor  
26 medication waste that require an anesthesiologist disposing of wasted medication to return  
27 difference to the pharmacy for destruction or document a witness observing him/her waste the  
28 unused portion of medication in the operating room. However, if an anesthesiologist prescribes

1 an amount of medication that is the total, whole number of the vial, then there is no medical  
2 waste, and nothing to monitor because anesthesiologists are presumed to administer the entire  
3 dose they prescribe.

4 19. After the events of January 9, 2023, Mercy Hospital conducted a review of  
5 Respondent's prescribing of controlled IV medications for the preceding three months. The audit  
6 showed that, during those three months, Respondent prescribed IV medications to all his patients,  
7 except one, in whole unit milliliters, such as 3.0 ml or 2.0 ml. As a result, during the entire three  
8 months, Respondent had only one documented instance of medication waste. If Respondent was  
9 prescribing and dosing medications accurately to his patients, it would be virtually impossible for  
10 every patient but one to require a dose that was exactly a whole number unit of measurement.  
11 Respondent's pattern of prescribing instead suggests that he was rounding up the doses of  
12 medications his patients needed and diverting the portion that should have been wasted to  
13 himself.

14 **FIRST CAUSE FOR DISCIPLINE**

15 **(Failure to Comply with Order under Business and Profession Code Section 821)**

16 20. Respondent is subject to disciplinary action under section 2234 and section 821 of the  
17 Code in that he failed to comply with an Order issued under section 820 of the Code.

18 21. Paragraphs 13 through 19, above, are re-alleged and incorporated as if fully set forth  
19 herein.

20 **SECOND CAUSE FOR ACTION**

21 **(Having a Mental or Physical Condition that Affects Competency to Practice Safely)**

22 22. Respondent is subject to disciplinary action under section 822 of the Code in that he is  
23 suffering from a mental or physical condition that affects his competency to practice medicine  
24 safely.

25 23. Paragraphs 13 through 19, above, are re-alleged and incorporated as if fully set forth  
26 herein.

27 ///

28 ///

### **THIRD CAUSE FOR DISCIPLINE**

**(Use of Drugs or Alcohol in a Manner Dangerous to Oneself or Others)**

3           24. Respondent is subject to disciplinary action under section 2239 of the Code in that he  
4           used drugs or alcohol in a manner so that is dangerous to himself or others.

5       25. Paragraphs 13 through 19, above, are re-alleged and incorporated as if fully set forth  
6 herein.

## **FOURTH CAUSE FOR DISCIPLINE**

## **(Dishonest or Corrupt Acts Related to the Practice of Medicine)**

9        26. Respondent is subject to disciplinary action under section 2234, subdivision (e) of the  
10 Code in that he committed a dishonest or corrupt act related to the practice of medicine.

11       27. Paragraphs 13 through 19, above, are re-alleged and incorporated as if fully set forth  
12 herein.

## **FIFTH CAUSE FOR DISCIPLINE**

### **(Unprofessional Conduct)**

15. 28. Respondent is subject to disciplinary action under section 2234 of the Code in that he  
16. has engaged in conduct that breaches the rules or ethical code of the medical profession or  
17. conduct that is unbecoming of a member in good standing of the medical profession, and which  
18. demonstrates an unfitness to practice medicine.

19       29. Paragraphs 13 through 19, above, are re-alleged and incorporated as if fully set forth  
20 herein.

## PRAYER

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

24 1. Revoking or suspending Physician's and Surgeon's Certificate Number A 72911,  
25 issued to Respondent Qasem M. Noori, M.D.;

26       2. Revoking, suspending or denying approval of Respondent Qasem M. Noori, M.D.'s  
27 authority to supervise physician assistants and advanced practice nurses;

1       3. Ordering Respondent Qasem M. Noori, M.D., to pay the Board the costs of the  
2 investigation and enforcement of this case, and if placed on probation, the costs of probation  
3 monitoring;

4       4. Ordering Respondent Qasem M. Noori, M.D., if placed on probation, to provide  
5 patient notification in accordance with Business and Professions Code section 2228.1; and

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

7  
8 DATED: MAR 28 2025 

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

DATED: MAIL TO 9 BLDG

DATED: \_\_\_\_\_

SA2024300231