

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

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

Stacy Fang, M.D.

**Physician's and Surgeon's
Certificate No. A 140045**

Case No.: 800-2024-112587

Respondent.

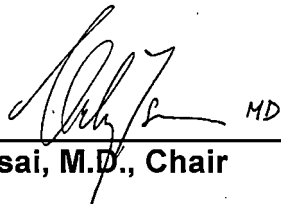
DECISION

The attached Stipulated Settlement 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 October 9, 2026.

IT IS SO ORDERED: September 10, 2026.

MEDICAL BOARD OF CALIFORNIA

 MD.

**Veling Tsai, M.D., Chair
Panel A**

1 ROB BONTA
Attorney General of California
2 GREG W. CHAMBERS
Supervising Deputy Attorney General
3 NILUFAR K. MAJD
Deputy Attorney General
4 State Bar No. 246017
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 229-0114
6 Facsimile: (415) 703-5843
E-mail: Nilu.Majd@doj.ca.gov
7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

12 **STACY FANG, M.D.**
13 **2238 Geary Blvd., 5th Floor**
SAN FRANCISCO CA 94115-3416

14 **Physician's & Surgeon's Certificate**
15 **No. A 140045,**

16 Respondent.

Case No. 800-2024-112587

OAH No. 2026010738

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 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 Nilufar K. Majd, Deputy
24 Attorney General.

25 2. Respondent Stacy Fang, M.D. (Respondent) is represented in this proceeding by
26 attorney Marglyn E. Paseka, Esq., whose address is: 50 California Street, 34th Floor,
27 San Francisco, CA 94111.

28 ///

3. On or about January 4, 2016, the Board issued Physician's & Surgeon's Certificate No. A 140045 to Respondent. The Physician's & Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2024-112587, and will expire on January 31, 2028, unless renewed.

JURISDICTION

4. Accusation No. 800-2024-112587 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 November 13, 2025. Respondent timely filed her Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 800-2024-112587 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2024-112587. Respondent has also carefully read, fully discussed with her counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

7. 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.

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

9. Respondent acknowledges the fact that, if adopted by the Board, the Board will report this Stipulated Settlement and Disciplinary Order to the National Practitioner Data Bank (NPDB) and Federation of State Medical Boards (FSMB) and publicly post such enforcement action, and Respondent hereby waives any and all objections thereto.

1 **CULPABILITY**

2 10. Respondent understands and agrees that the charges and allegations in Accusation
3 No. 800-2024-112587, if proven at a hearing, constitute cause for imposing discipline upon her
4 Physician's & Surgeon's Certificate.

5 11. Respondent does not contest that, at an administrative hearing, Complainant could
6 establish a *prima facie* case with respect to the charges and allegations in Accusation No. 800-
7 2024-112587, a true and correct copy of which is attached hereto as Exhibit A, and that she has
8 thereby subjected her Physician's & Surgeon's Certificate, No. A 140045 to disciplinary action.

9 12. Respondent agrees that her Physician's & Surgeon's Certificate is subject to
10 discipline and agrees to be bound by the Board's probationary terms as set forth in the
11 Disciplinary Order below.

12 **CONTINGENCY**

13 13. This stipulation shall be subject to approval by the Medical Board of California.
14 Respondent understands and agrees that counsel for Complainant and the staff of the Medical
15 Board of California may communicate directly with the Board regarding this stipulation and
16 settlement, without notice to, or participation by Respondent or her counsel. By signing the
17 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
18 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
19 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
20 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
21 action between the parties, and the Board shall not be disqualified from further action by having
22 considered this matter.

23 14. This Stipulated Settlement and Disciplinary Order is intended by the parties herein to
24 be an integrated writing representing the complete, final and exclusive embodiment of the
25 agreement of the parties in this above-entitled matter.

26 15. Respondent agrees that if she ever petitions for early termination or modification of
27 probation, or if an accusation and/or petition to revoke probation is filed against her before the
28 Board, all of the charges and allegations contained in Accusation No. 800-2024-112587 shall be

1 deemed true, correct and fully admitted by Respondent for purposes of any such proceeding or
2 any other licensing proceeding involving Respondent in the State of California.

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

6 17. In consideration of the foregoing admissions and stipulations, the parties agree that
7 the Board may, without further notice or opportunity to be heard by the Respondent, issue and
8 enter the following Disciplinary Order:

9 **DISCIPLINARY ORDER**

10 IT IS HEREBY ORDERED that Physician's & Surgeon's Certificate No. A 140045 issued
11 to Respondent STACY FANG, M.D., is revoked. However, the revocation is stayed, and
12 Respondent is placed on probation for three (3) years on the following terms and conditions:

13 1. EDUCATION COURSE. Within 60 calendar days of the effective date of this
14 Decision, and on an annual basis thereafter, Respondent shall submit to the Board or its designee
15 for its prior approval educational program(s) or course(s) which shall not be less than 40 hours
16 per year, for each year of probation. The educational program(s) or course(s) shall be aimed at
17 correcting any areas of deficient practice or knowledge and shall be Category I certified. The
18 educational program(s) or course(s) shall be at Respondent's expense and shall be in addition to
19 the Continuing Medical Education (CME) requirements for renewal of licensure. Following the
20 completion of each course, the Board or its designee may administer an examination to test
21 Respondent's knowledge of the course. Respondent shall provide proof of attendance for 65
22 hours of CME of which 40 hours were in satisfaction of this condition.

23 2. PROFESSIONALISM PROGRAM (ETHICS COURSE). Within 60 calendar days of
24 the effective date of this Decision, Respondent shall enroll in a professionalism program that
25 meets the requirements of Title 16, California Code of Regulations (CCR) section 1358.1.
26 Respondent shall participate in and successfully complete that program. Respondent shall
27 provide any information and documents that the program may deem pertinent. Respondent shall
28 successfully complete the classroom component of the program not later than six (6) months after

Respondent's initial enrollment, and the longitudinal component of the program not later than the time specified by the program, but no later than one (1) year after attending the classroom component. The professionalism program shall be at Respondent's expense and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

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

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

3. SOLO PRACTICE PROHIBITION. Respondent is prohibited from engaging in the solo practice of medicine. Prohibited solo practice includes, but is not limited to, a practice where: 1) Respondent merely shares office space with another physician but is not affiliated for purposes of providing patient care, or 2) Respondent is the sole physician practitioner at that location.

If Respondent fails to establish a practice with another physician or secure employment in an appropriate practice setting within 60 calendar days of the effective date of this Decision, Respondent shall receive a notification from the Board or its designee to cease the practice of medicine within three (3) calendar days after being so notified. The Respondent shall not resume practice until an appropriate practice setting is established.

If, during the course of the probation, the Respondent's practice setting changes and the Respondent is no longer practicing in a setting in compliance with this Decision, the Respondent shall notify the Board or its designee within five (5) calendar days of the practice setting change. If Respondent fails to establish a practice with another physician or secure employment in an appropriate practice setting within 60 calendar days of the practice setting change, Respondent shall receive a notification from the Board or its designee to cease the practice of medicine within

1 three (3) calendar days after being so notified. The Respondent shall not resume practice until an
2 appropriate practice setting is established.

3 4. NOTIFICATION. Within seven (7) days of the effective date of this Decision, the
4 Respondent shall provide a true copy of this Decision and Accusation to the Chief of Staff or the
5 Chief Executive Officer at every hospital where privileges or membership are extended to
6 Respondent, at any other facility where Respondent engages in the practice of medicine,
7 including all physician and locum tenens registries or other similar agencies, and to the Chief
8 Executive Officer at every insurance carrier which extends malpractice insurance coverage to
9 Respondent. Respondent shall submit proof of compliance to the Board or its designee within 15
10 calendar days.

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

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

15 6. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby
16 ordered to reimburse the Board its costs of investigation and enforcement, including, but not
17 limited to, expert review, amended accusations, legal reviews, investigation(s), and subpoena
18 enforcement, as applicable, in the amount of \$9,188.60 (nine thousand one hundred and eighty-
19 eight dollars and sixty cents). Costs shall be payable to the Medical Board of California. Failure
20 to pay such costs shall be considered a violation of probation.

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

25 The filing of bankruptcy by Respondent shall not relieve Respondent of the responsibility
26 to repay investigation and enforcement costs, including expert review costs.

27 7. QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations
28 under penalty of perjury on forms provided by the Board stating whether there has been

1 compliance with all the conditions of probation.

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

4 8. GENERAL PROBATION REQUIREMENTS.

5 Compliance with Probation Unit

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

7 Address Changes

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

13 Place of Practice

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

17 License Renewal

18 Respondent shall maintain a current and renewed California physician's and surgeon's
19 license.

20 Travel or Residence Outside California

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

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

27 9. INTERVIEW WITH THE BOARD OR ITS DESIGNEE. Respondent shall be
28 available in person upon request for interviews either at Respondent's place of business or at the

1 probation unit office, with or without prior notice throughout the term of probation.

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

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

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

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

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

28 ///

1 11. COMPLETION OF PROBATION. Respondent shall comply with all financial
2 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
3 completion of probation. This term does not include cost recovery, which is due within 30
4 calendar days of the effective date of the Order, or by a payment plan approved by the Medical
5 Board and timely satisfied. Upon successful completion of probation, Respondent's certificate
6 shall be fully restored.

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

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

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

15. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing action agency in the State of California, all of the charges and allegations contained in Accusation No. 800-2024-112587 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict license.

ACCEPTANCE

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

DATED: 07 / 28 / 2026

Stacy Fang

STACY FANG, M.D.
Respondent

I have read and fully discussed with Respondent Stacy Fang, M.D. the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 07 / 29 / 2026

M. Paseka

MARGLYN E. PASEKA, ESQ.
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California.

DATED: July 31, 2026

Respectfully submitted,

ROB BONTA
Attorney General of California
GREG W. CHAMBERS
Supervising Deputy Attorney General

Nilufar K. Majd

NILUFAR K. MAJD
Deputy Attorney General
Attorneys for Complainant

SF2025304382
Stip Settlement and Disc Order - MBC-Osteopathic.docx

1 ROB BONTA
Attorney General of California
2 GREG W. CHAMBERS
Supervising Deputy Attorney General
3 NILUFAR K. MAJD
Deputy Attorney General
4 State Bar No. 246017
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 229-0114
6 Facsimile: (415) 703-5843
E-mail: Nilu.Majd@doj.ca.gov
7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. 800-2024-112587

12 **Stacy Fang, M.D.**
13 

A C C U S A T I O N

14 **Physician's & Surgeon's Certificate**
15 **No. A 140045,**

16 Respondent.

17
18 **PARTIES**

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

21 2. On or about January 4, 2016, the Medical Board issued Physician's & Surgeon's
22 Certificate Number A 140045 to Stacy Fang, M.D. (Respondent). The Physician's & Surgeon's
23 Certificate was in full force and effect at all times relevant to the charges brought herein and will
24 expire on January 31, 2026, unless renewed.

25 ///

26 ///

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 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.

5. 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 which is substantially related to the qualifications, functions, or duties of a physician and surgeon.

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

2 “ ...”

3 **COST RECOVERY**

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

10 **FACTUAL BACKGROUND**

11 7. At all relevant times, Respondent was an obstetrician and gynecologist (OBGYN)
12 employed by The Permanente Medical Group (TPMG) in San Francisco, California.

13 8. On or about July 28, 2023, Patient A,¹ who was 40 years old and 38 weeks and 2 days
14 pregnant, was seen at Kaiser Permanente (Kaiser) in San Rafael, California, for a routine
15 scheduled prenatal check-up and care. At this visit, the fetal heart rate (FHR) was normal and
16 noted in the 100s beats per minute (BPM). As part of the routine check-up, the attending
17 physician performed a Non-Stress Test, noting deceleration of the FHR in the 70’s for
18 approximately 3 minutes. At this time, terbutaline² was administered, and Patient A was informed
19 to be prepared for an emergency cesarean section delivery.

20 9. Due to the concerning prolonged FHR deceleration of the fetus, Patient A was sent by
21 emergency ambulance to the nearest hospital, Marin General Health (Marin General), for
22 evaluation and assessment for the possible need for an emergency cesarean section. Patient A was
23 monitored for approximately six hours at Marin General, during which time, no fetal heart rate
24 abnormalities were detected. Upon communication with a Kaiser physician, it was recommended
25 that Patient A be transferred to Kaiser hospital to induce labor. Patient A agreed and was

26 _____
27 ¹ All references to patient and provider names have been redacted to protect patient
28 confidentiality. Full patient names will be provided upon receipt of a Request for Discovery.

² Terbutaline has been used in selected patients to inhibit uterine contractions in preterm
labor in an attempt to prolong pregnancy and prevent preterm birth.

1 transferred by non-emergency ambulance to Kaiser in San Francisco, CA, where she was
2 admitted for the induction of labor.

3 10. Kaiser doctors considered Patient A as a high-risk pregnancy due to her age, a
4 pregnancy achieved via In Vitro Fertilization (IVF), and a history of a bile-related liver issue in a
5 previous pregnancy.

6 11. Kaiser doctors recommended labor induction for Patient A on July 28, 2023. To start
7 the labor process, Patient A chose a Cook balloon, which was inserted into her cervix and inflated
8 to help it open. To further help with contractions, she was also given a medication called Pitocin,³
9 intravenously.

10 12. Some two and a half hours after admission to Kaiser, at approximately 9:20 p.m.,
11 Patient A had a fetal deceleration from FHR baseline of 120 to the 60s. The medical team briefly
12 lost the monitoring signal, but the heart rate recovered to normal within 6 minutes. The cervical
13 balloon was checked and remained in place.

14 13. At approximately 1:00 a.m., the fetus's heart monitor again lost contact. The registered
15 nurses entered the room and tried, unsuccessfully, to locate the fetal heartbeat. After several
16 minutes, the registered nurses called Respondent to evaluate Patient A via an ultrasound.
17 Respondent administered an on-body surface ultrasound where the fetal cardiac activity was
18 absent, and no fetal movement was seen. Terbutaline was again administered. Respondent
19 diagnosed Patient A with Intrauterine Fetal Demise (IUFD). Two additional attending physicians
20 were called and confirmed absence of fetal cardiac activity and the IUFD diagnosis. Upon
21 diagnosis, the Cook balloon was removed, and Patient A was given time to grieve.

22 14. Respondent ordered all procedures, including labor, to stop. Kaiser discontinued
23 monitoring the unborn baby at 1:08 a.m. on July 29, 2023. Patient A was informed she would
24 need to be induced to deliver a stillborn baby. At 12:05 p.m. on July 29, 2023, Patient A delivered
25 a living baby boy. The medical record noted, the baby was born via a "normal spontaneous
26 vaginal delivery." The baby was taken to the Neonatal Intensive Care Unit (NICU) for

27
28 ³ Pitocin is used to induce labor during a scheduled induction or to help progress a long
labor that is not resulting in the cervical dilation necessary to complete the birth.

1 observation, to make sure he was healthy. Patient A's recovery after birth was routine and she
2 was discharged from the hospital on her third day postpartum.

3 **CAUSE FOR DISCIPLINE**

4 **(Gross Negligence)**

5 15. Respondent is subject to disciplinary action under sections 2227 and 2234, as defined
6 by section 2234, subdivision (b), of the Code, in that she committed gross negligent acts in her
7 care and treatment of Patient A, as more particularly alleged hereinafter:

8 16. Paragraphs 7 through 14, above, are hereby incorporated by reference and realleged as
9 if fully set forth herein.

10 17. Respondent committed gross negligence in her care of Patient A. Patient A was a high-
11 risk pregnancy brought to Kaiser for an urgent intervention due to possible FHR decelerations.
12 After being unable to clearly identify the FHR, Respondent negligently recommended an induction
13 of labor for an IUFD, rather than offering an emergency cesarean delivery. Consequently, the fetus
14 did not receive monitoring for approximately 11 hours.

15 **PRAYER**

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

18 1. Revoking or suspending Physician's & Surgeon's Certificate Number A 140045, issued
19 to Respondent Stacy Fang, M.D.;

20 2. Revoking, suspending or denying approval of Respondent Stacy Fang, M.D.'s authority
21 to supervise physician assistants and advanced practice nurses;

22 3. Ordering Respondent Stacy Fang, M.D., to pay the Board the costs of the investigation
23 and enforcement of this case, and if placed on probation, the costs of probation monitoring; and

24 ///

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

DATED: NOV 13 2025



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