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

In the Matter of the Accusation
Against:

NASRIN MANI, M.D.
Physician's and Surgeon's
Certificate No. A 40473
Respondent

Case No. 800-2014-002393

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 March 2, 2017.


MEDICAL BOARD OF CALIFORNIA

By: [Signature]
Michelle Anne Bholat, M.D., Chair
Panel B
BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

NASRIN MANI, M.D.
835 Third Avenue, # A
Chula Vista, California 91911

Physician’s and Surgeon’s Certificate No.
A40473,

Respondent.

Case No. 800-2014-002393
OAH No. 2016-050646
STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

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

PARTIES

1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board of California. She brought this action solely in her official capacity and is represented in this matter by Kamala D. Harris, Attorney General of the State of California, by Joseph F. McKenna III, Deputy Attorney General.

2. Respondent Nasrin Mani, M.D., is represented in this proceeding by attorney Robert W. Frank, Esq., whose address is: 1010 Second Avenue, Suite 2500, San Diego, California, 92101.
3. On or about October 11, 1983, the Medical Board of California issued Physician’s and Surgeon’s Certificate No. A40473 to Nasrin Mani, M.D. (Respondent). The Physician’s and Surgeon’s Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2014-002393, and will expire on July 31, 2017, unless renewed.

**JURISDICTION**

4. On February 9, 2016, Accusation No. 800-2014-002393 was filed before the Medical Board of California (Board), Department of Consumer Affairs, and is currently pending against Respondent. On February 9, 2016, a true and correct copy of Accusation No. 800-2014-002393 and all other statutorily required documents were properly served on Respondent by certified mail at her address of record on file with the Board which was: 835 Third Avenue, # A, Chula Vista, California, 91911. Respondent filed her Notice of Defense contesting the Accusation on February 24, 2016. A true and correct copy of Accusation No. 800-2014-002393 is attached hereto as Exhibit A and incorporated herein by reference as if fully set forth herein.

**ADVICEMENT AND WAIVERS**

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2014-002393. Respondent has also carefully read, fully discussed with counsel, and fully understands the effects of this Stipulated Settlement and Disciplinary 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 Accusation No. 800-2014-002393; the right to be represented by counsel at her own expense; 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, having been fully advised of the same by her attorney of record, Robert W. Frank, Esq.

7. Having the benefit of counsel, Respondent hereby voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.
CULPABILITY

8. Respondent does not contest that, at an administrative hearing, Complainant could establish a prima facie case with respect to the charges and allegations contained in Accusation No. 800-2014-002393, as more particularly described only in paragraphs 16, 21, 27 and 28, and that she has thereby subjected her Physician’s and Surgeon’s Certificate No. A40473 to disciplinary action.

9. Respondent agrees that if an accusation and/or petition to revoke probation is filed against her before the Medical Board of California, with respect to the charges and allegations contained in Accusation No. 800-2014-002393, as more particularly described only in paragraphs 16, 21, 27 and 28, shall be deemed true, correct and fully admitted by Respondent for purposes of any such proceeding, or any other licensing proceeding involving Respondent in the State of California.

CONTINGENCY

10. This Stipulated Settlement and Disciplinary Order shall be subject to approval of the Board. The parties agree that this Stipulated Settlement and Disciplinary Order shall be submitted to the Board for its consideration in the above-entitled matter and, further, that the Board shall have a reasonable period of time in which to consider and act on this Stipulated Settlement 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 Board considers and acts upon it.

11. The parties agree that this Stipulated Settlement and Disciplinary Order shall be null and void and not binding upon the parties unless approved and adopted by 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 Settlement and Disciplinary Order, 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 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 Board does not, in its
discretion, approve and adopt this Stipulated Settlement and Disciplinary Order, with the exception of this paragraph, it shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied upon or introduced in any disciplinary action by either party hereto. Respondent further agrees that should this Stipulated Settlement and Disciplinary Order be rejected for any reason by the Board, Respondent will assert no claim that the Board, or any member thereof, was prejudiced by its/his/her review, discussion and/or consideration of this Stipulated Settlement and Disciplinary Order or of any matter or matters related hereto.

ADDITIONAL PROVISIONS

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

13. The parties agree that copies of this Stipulated Settlement 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.

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

DISCIPLINARY ORDER

1. PUBLIC REPRIMAND.

IT IS HEREBY ORDERED that Respondent Nasrin Mani, M.D., Physician’s and Surgeon’s Certificate No. A40473, shall be and is hereby Publicly Reprimanded pursuant to California Business and Professions Code section 2227, subdivision (a), subsection (4). This Public Reprimand, which is issued in connection with the allegation as set forth in Accusation No. 800-2014-002393, is as follows:

Respondent is publicly reprimanded for violating Business and Professions Code 651 in 2015 by falsely stating on internet advertising media and otherwise that she was the double board certified founder of La Jolla Cosmetic Laser Surgery Center when in fact she was not double board certified. The Medical Board of
California recognizes only her board certification by the American Board of Ophthalmology and does not recognize her certification by the American Board of Cosmetic and Aesthetic Medicine. Such publications were misleading and deceptive to the public.

**ACCEPTANCE**

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Robert W. Frank, Esq. I understand the stipulation and the effect it will have on my Physician’s and Surgeon’s Certificate No. A40473. 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:** 10/3/16

NASRIN MANI, M.D.

Respondent

I have read and fully discussed with Respondent Jasmine McLeod, 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:** 10–10–16

ROBERT W. FRANK, 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: **October 19, 2016**

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General

JOSEPH F. MCKENNA III
Deputy Attorney General
Attorneys for Complainant
Exhibit A

Accusation No. 800-2014-002393
BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

N ASRIN M ANI, M.D.
835 Third Avenue #A
Chula Vista, CA 91911

Physician’s and Surgeon’s Certificate
No. A 40473,

Respondent.

Complainant alleges:

PARTIES

1. Kimberly Kirchmeyer (complainant) brings this Accusation solely in her official capacity as the Executive Director of the Medical Board of California, Department of Consumer Affairs (Board).

2. On or about October 11, 1983, the Medical Board issued Physician’s and Surgeon’s Certificate No. A 40473 to Nasrin Mani, M.D. (respondent). The Physician’s and Surgeon’s Certificate No. A 40473 was in full force and effect at all times relevant to the charges brought herein and will expire on July 31, 2017, unless renewed.

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JURISDICTION

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

4. Section 2220 of the Code states, in pertinent part:

   "Except as otherwise provided by law, the board may take action against all persons guilty of violating this chapter [Chapter 5, the Medical Practice Act]. The board shall enforce and administer this article as to physician and surgeon certificates holders."

5. Section 2227, subdivision (a), of the Code states:

   "A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter [Chapter 5, the Medical Practice Act]:

   "(1) Have his or her license revoked upon order of the board.

   "(2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.

   "(3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.

   "(4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.

   "(5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper."

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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.

"..."

7. Section 651 of the Code states in pertinent part:

"(a) It is unlawful for any person licensed under this division or under any initiative act referred to in this division to disseminate or cause to be disseminated any form of public communication containing a false, fraudulent, misleading, or deceptive statement, claim, or image for the purpose of or likely to induce, directly or indirectly, the rendering of professional services or furnishing of products in connection with the professional practice or business for which he or she is licensed. A 'public communication' as used in this section includes, but is not limited to, communication
by means of mail, television, radio, motion picture, newspaper, book, list or directory of healing arts practitioners, Internet, or other electronic communication.

"(b) A false, fraudulent, misleading, or deceptive statement, claim, or image includes a statement or claim that does any of the following:

"(1) Contains a misrepresentation of fact.

"(2) Is likely to mislead or deceive because of a failure to disclose material facts.

"...

"(5) Contains other representations or implications that in reasonable probability will cause an ordinarily prudent person to misunderstand or be deceived.

"(6) Makes a claim either of professional superiority or of performing services in a superior manner, unless that claim is relevant to the service being performed and can be substantiated with objective scientific evidence.

"(7) Makes a scientific claim that cannot be substantiated by reliable, peer reviewed, published scientific studies.

"(8) Includes any statement, endorsement, or testimonial that is likely to mislead or deceive because of a failure to disclose material facts.

"...

"(e) Any person so licensed may not use any professional card, professional announcement card, office sign, letterhead, telephone directory listing, medical list, medical directory listing, or a similar professional notice or device if it includes a statement or claim that is false, fraudulent, misleading, or deceptive within the meaning of subdivision (b).

"(f) Any person so licensed who violates this section is guilty of a misdemeanor. A bona fide mistake of fact shall be a defense to this subdivision, but only to this subdivision.

"(g) Any violation of this section by a person so licensed shall constitute
good cause for revocation or suspension of his or her license or other disciplinary action.

... "(C) A physician and surgeon licensed under Chapter 5 (commencing with Section 2000) by the Medical Board of California may include a statement that he or she limits his or her practice to specific fields, but shall not include a statement that he or she is certified or eligible for certification by a private or public board or parent association, including, but not limited to, a multidisciplinary board or association, unless that board or association is (i) an American Board of Medical Specialties member board, (ii) a board or association with equivalent requirements approved by that physician and surgeon's licensing board, or (iii) a board or association with an Accreditation Council for Graduate Medical Education approved postgraduate training program that provides complete training in that specialty or subspecialty. A physician and surgeon licensed under Chapter 5 (commencing with Section 2000) by the Medical Board of California who is certified by an organization other than a board or association referred to in clause (i), (ii), or (iii) shall not use the term 'board certified' in reference to that certification, unless the physician and surgeon is also licensed under Chapter 4 (commencing with Section 1600) and the use of the term 'board certified' in reference to that certification is in accordance with subparagraph (A). A physician and surgeon licensed under Chapter 5 (commencing with Section 2000) by the Medical Board of California who is certified by a board or association referred to in clause (i), (ii), or (iii) shall not use the term 'board certified' unless the full name of the certifying board is also used and given comparable prominence with the term "board certified" in the statement.

For purposes of this subparagraph, a 'multidisciplinary board or association's means an educational certifying body that has a psychometrically valid testing process, as determined by the Medical Board of California, for certifying medical doctors and other health care professionals that is based on the applicant's
education, training, and experience.

“For purposes of the term ‘board certified,’ as used in this subparagraph, the terms ‘board’ and ‘association’ mean an organization that is an American Board of Medical Specialties member board, an organization with equivalent requirements approved by a physician and surgeon’s licensing board, or an organization with an Accreditation Council for Graduate Medical Education approved postgraduate training program that provides complete training in a specialty or subspecialty.

“The Medical Board of California shall adopt regulations to establish and collect a reasonable fee from each board or association applying for recognition pursuant to this subparagraph. The fee shall not exceed the cost of administering this subparagraph. Notwithstanding Section 2 of Chapter 1660 of the Statutes of 1990, this subparagraph shall become operative July 1, 1993. However, an administrative agency or accrediting organization may take any action contemplated by this subparagraph relating to the establishment or approval of specialist requirements on and after January 1, 1991.

8. Section 2216 of the Code states:

“On or after July 1, 1996, no physician and surgeon shall perform procedures in an outpatient setting using anesthesia, except local anesthesia or peripheral nerve blocks, or both, complying with the community standard of practice, in doses that, when administered, have the probability of placing a patient at risk for loss of the patient's life preserving protective reflexes, unless the setting is specified in Section 1248.1 [of the Health and Safety Code]. Outpatient settings where anxiolytics and analgesics are administered are excluded when administered, in compliance with the community standard of practice, in doses that do not have the probability of placing the patient at risk for loss of the patient's life preserving protective reflexes.

“The definition of >outpatient settings< contained in subdivision (c) of Section 1248 [of the Health and Safety Code] shall apply to this section.
9. Section 1248.1 of the Health and Safety Code states:

"No association, corporation, firm, partnership, or person shall operate, manage, conduct, or maintain an outpatient setting in this state, unless the setting is one of the following:

"(a) An ambulatory surgical center that is certified to participate in the Medicare program under Title XVIII (42 U.S.C. Sec. 1395 et seq.) of the federal Social Security Act.

"(b) Any clinic conducted, maintained, or operated by a federally recognized Indian tribe or tribal organization, as defined in Section 450 or 1601 of Title 25 of the United States Code, and located or land recognized as trial land by the federal government.

"(c) Any clinic directory conducted, maintained, or operated by the United States or by any of its departments, officers, or agencies.

"(d) Any primary care clinic licensed under subdivision (a) and any surgical clinic licensed under subdivision (b) of Section 1204.

"(e) Any health facility licensed as a general acute care hospital under Chapter 2 (commencing with Section 1250).

"(f) Any outpatient setting to the extent that it is used by a dentist or physician and surgeon in compliance with Article 2.7 (commencing with Section 1646) or Article 2.8 (commencing with Section 1647) of Chapter 4 of Division 2 of the Business and Professions Code.

"(g) Any outpatient setting accredited by an accreditation agency approved by the division pursuant to this chapter.

"(h) A setting, including, but not limited to, a mobile van, in which equipment is used to treat patients admitted to a facility described in subdivision (a), (d), or (e), and in which the procedures performed are staffed by the medical staff of, or other healthcare practitioners with clinical privileges at, the facility..."
and are subject to the peer review process of the facility but which setting is not a part of a facility described in subdivision (a), (d), or (e).

"Nothing in this section shall relieve an association, corporation, firm, partnership, or person from complying with all other provisions of law that are otherwise applicable."

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

**FIRST CAUSE FOR DISCIPLINE**

(Gross Negligence)

11. Respondent has subjected her Physician’s and Surgeon’s Certificate No. A 40473 to disciplinary action under sections 2227 and 2234 of the Code, as defined by section 2234, subdivision (b), of the Code, in that she committed gross negligence in her operation of La Jolla Cosmetic Laser Surgery Center (LJCLSC), as more particularly alleged hereinafter:

12. On July 29, 2015, respondent was interviewed at the California Medical Board’s San Diego District Office. During that interview respondent stated that LJCLSC utilizes conscious sedation during certain procedures by administering Versed\(^1\) orally. Respondent indicated that if Versed is administered intravenously, “we call a anesthesiologist.” Respondent further indicated that the LJCLSC is not a licensed, accredited or certified outpatient setting.

\[...\\]

\[^{1}\text{Is a Schedule IV controlled substance pursuant to Health and Safety Code section 11057, subdivision (d), and a dangerous drug pursuant to Business and Professions Code section 4022.}\]
13. Respondent committed gross negligence which included, but was not limited to, the following:

   (a) Respondent permitted procedures to be conducted under conscious sedation in an unlicensed, unaccredited, or uncertified outpatient setting.

   **SECOND CAUSE FOR DISCIPLINE**

   (Repeated Negligent Acts)

   14. Respondent has further subjected her Physician’s and Surgeon’s Certificate No. A 40473 to disciplinary action under sections 2227 and 2234 of the Code, as defined by section 2234, subdivision (c), of the Code, in that she committed repeated negligent acts in her operation of LJCLSC, as more particularly alleged hereinafter:

   15. Paragraphs 12 through 13, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

   16. Since in or about 2005, respondent has owned and operated the LJCLSC. The LJCLSC employs a physician, a physician assistant, registered nurses, medical assistants, an office manager and clerical workers. LJCLSC provides aesthetic services, including but not limited to Fraction C02 Laser treatments and Intense Pulsed Light therapy, injectables such as hyaluronic acid fillers and botulinum toxin, and fat reduction with external devices such as Coolsculpting.

   17. On or about May 5, 2011, patient D.K. presented to the LJCLSC. At this initial appointment, registered nurse M.M. recommended that patient D.K. receive Intense Pulsed Light therapy\(^2\) (IPL) utilizing the Lumenis One machine to treat rosacea, redness, and discoloration on his neck and chest. On or about May 5, 2011, Dr. J.M., approved nurse M.M.’s treatment recommendations. The proposed IPL treatments were to be administered over three clinical visits.

\(^2\) Intense pulsed light, commonly abbreviated as IPL, is a technology used by cosmetic and medical practitioners to perform various skin treatments for aesthetic and therapeutic uses. The technology utilizes a broad spectrum light source, with a general spectral range of 500 to 1200 nm.
18. JICLSC's written protocol for IPL treatment only authorized respondent and J.P., a former employee, to perform IPL therapy in its list or authorized providers.

19. On or about May 16, 2011, registered nurse M.M. performed IPL therapy on patient D.K. At the time registered nurse M.M. performed this treatment, she was not listed as an authorized IPL provider in the JICLSC protocol.

20. On or about August 15, 2011, Dr. J.M. performed the second IPL therapy treatment on patient D.K.'s neck and chest using the Lumenis One machine. At the time that Dr. J.M. performed the second IPL treatment on patient D.K., she had not previously reviewed the JICLSC's written IPL protocol nor was she listed as a provider in the JICLSC protocol.

21. In or about March 2014, respondent's website for JICLSC stated that respondent is the "double board certified founder" of JICLSC. The website further stated that respondent is a Diplomate of the American Academy of Opthamology and a Diplomate of the American Board of Cosmetic and Aesthetic Medicine. The American Board of Cosmetic and Aesthetic Medicine is not a recognized American Board of Medical Specialty.

22. Respondent committed repeated negligent acts which included, but was not limited to, the following:

   (a) Respondent permitted procedures to be conducted under conscious sedation in an unlicensed, unaccredited, or uncertified outpatient setting.

   (b) Respondent failed to adequately insure that the JICLSC's IPL therapy protocol was reviewed by JICLSC employees who administered IPL therapy;

   (c) Respondent failed to update the JICLSC's IPL therapy protocol to reflect which JICLSC employees were authorized to administer IPL therapy; and

   (d) Respondent claimed to be double board certified when, in fact, she was not.

**THIRD CAUSE FOR DISCIPLINE**

(Lack of Outpatient Setting Accreditation)

23. Respondent has further subjected her Physician's and Surgeon's Certificate Number A 40473 to disciplinary action under sections 2227 and 2234, as defined by section 2216 of the Code, and Health and Safety Code section 1248.1, in that she authorized the use of sedating
medication that places a patient at risk for loss of the patient's life preserving protective reflexes
in an unlicensed, unaccredited, or uncertified outpatient setting, as more particularly alleged
herein:

24. Paragraphs 12 through 13, above, are hereby incorporated by reference and realleged
as if fully set forth herein.

FOURTH CAUSE FOR DISCIPLINE
(Violating or Attempting to Violate, Directly or Indirectly,
A Provision of the Medical Practice Act)

25. Respondent has further subjected her Physician's and Surgeon's Certificate No.
A 40473 to disciplinary action under sections 2227 and 2234 of the Code, as defined by section
2234, subdivision (a), of the Code, in that she violated or attempted to violate, directly or
indirectly, or assisted in or abetted the violation of, or conspired to violate, a provision of the
Medical Practice Act, as more particularly alleged hereinafter:

26. Paragraphs 12 through 24, above, are hereby incorporated by reference and realleged
as if fully set forth herein.

FIFTH CAUSE FOR DISCIPLINE
(Dissemination of False, Fraudulent, Misleading or Deceptive Statements, Claims or Images)

27. Respondent has further subjected her Physician's and Surgeon's Certificate No.
A 40473 to disciplinary action under section 651 of the Code, in that she has caused to be
disseminated public communications, namely by advertisements and statements on her internet
website, containing false, fraudulent, misleading or deceptive statements, claims or images for the
purpose of or likely to induce, directly or indirectly, the rendering of professional services or
furnishing of products in connection with the professional practice or business for which she is
licensed, as more particularly alleged hereinafter:

28. Paragraph 21, above, is hereby incorporated by reference and realleged as if fully set
forth herein.

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27
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SIXTH CAUSE FOR DISCIPLINE
(General Unprofessional Conduct)

29. Respondent has further subjected her Physician’s and Surgeon’s Certificate No. A 40473 to disciplinary action under sections 2227 and 2234 of the Code, as defined by section 2227 and 2234 of the Code in that she undertook conduct which breaches the rules or ethical code of the medical profession, or conduct which is unbecoming a member in good standing of the medical profession, and which demonstrates an unfitness to practice medicine, as more particularly alleged hereinafter:

30. Paragraphs 12 through 28, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

PRAYER

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

1. Revoking or suspending Physician’s and Surgeon’s Certificate No. A 40473, issued to respondent Nasrin Mani, M.D.;

2. Revoking, suspending or denying approval of respondent Nasrin Mani, M.D.’s, authority to supervise physician assistants, pursuant to section 3527 of the Code;

3. Ordering respondent Nasrin Mani, M.D., if placed on probation, to pay the Board the costs of probation monitoring; and

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

DATED: February 9, 2016

Kimberly Kirchheimer
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

Accusation Case No. 800-2014-002394