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

11 In the Matter of the Accusation Against:

Case No. 800-2021-081475

12 **Reno K. Ahuja, M.D.**  
13 **1435 Bradford Ln.**  
**Carbondale, IL 62902-6237**

**A C C U S A T I O N**

14 **Physician's and Surgeon's Certificate**  
15 **No. C 141861,**

16 Respondent.

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18 **PARTIES**

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

22 2. On or about April 12, 2016, the Medical Board issued Physician's and Surgeon's  
23 Certificate Number C 141861 to Reno K. Ahuja, M.D. (Respondent). The Physician's and  
24 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought  
25 herein and will expire on June 30, 2025, unless renewed.

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**JURISDICTION**

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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 141 of the Code states:

(a) For any licensee holding a license issued by a board under the jurisdiction of the department, a disciplinary action taken by another state, by any agency of the federal government, or by another country for any act substantially related to the practice regulated by the California license, may be a ground for disciplinary action by the respective state licensing board. A certified copy of the record of the disciplinary action taken against the licensee by another state, an agency of the federal government, or another country shall be conclusive evidence of the events related therein.

(b) Nothing in this section shall preclude a board from applying a specific statutory provision in the licensing act administered by that board that provides for discipline based upon a disciplinary action taken against the licensee by another state, an agency of the federal government, or another country.

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

6. Section 2305 of the Code states:

The revocation, suspension, or other discipline, restriction or limitation imposed by another state upon a license or certificate to practice medicine issued by that state, or the revocation, suspension, or restriction of the authority to practice medicine by any agency of the federal government, that would have been grounds for discipline in California of a licensee under this chapter [Chapter 5, the Medical Practice Act] shall constitute grounds for disciplinary action for unprofessional conduct against the licensee in this state.

1 **COST RECOVERY**

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

8 **FACTUAL ALLEGATIONS**

9 8. On or about August 23, 2021, the Illinois Department of Financial and Professional  
10 Regulation (IDFPR) issued a Consent Order in Case No. 2017-02069, subsequent to allegations  
11 Respondent prescribed controlled substances without renewing her Illinois Controlled Substance  
12 License; and failed to appropriately evaluate and treat a patient of her practice while the patient  
13 was experiencing an acute psychiatric episode. Under the terms of the Consent Order,  
14 Respondent was placed on indefinite probation for a minimum of one (1) year; required to have a  
15 practice monitor; and pay a fine, among other terms and conditions. A copy of the Consent Order  
16 is attached hereto as Exhibit 1.

17 **CAUSE FOR DISCIPLINE**

18 **(Discipline, Restriction, or Limitation Imposed by Another State)**

19 9. Paragraph 8 is incorporated by reference as if fully set forth.

20 10. Respondent Reno K. Ahuja, M.D., is subject to disciplinary action under sections 141  
21 and 2305 of the Code in that the action taken by IDFPR, by and through its Consent Order,  
22 regarding Respondent's Illinois license to practice medicine, as set forth above, constitutes cause  
23 for disciplinary action and/or unprofessional conduct within the meaning of sections 141 and  
24 2305 of the Code. Therefore, cause for discipline exists.

25 **PRAYER**

26 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
27 and that following the hearing, the Medical Board of California issue a decision:  
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1. Revoking or suspending Physician's and Surgeon's Certificate Number C 141861, issued to Respondent Reno K. Ahuja, M.D.;
2. Revoking, suspending or denying approval of Respondent Reno K. Ahuja, M.D.'s authority to supervise physician assistants and advanced practice nurses;
3. Ordering Respondent Reno K. Ahuja, M.D., to pay the Board the costs of the investigation and enforcement of this case, and if placed on probation, the costs of probation monitoring; and
4. Taking such other and further action as deemed necessary and proper.

DATED: APR 18 2024

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

# EXHIBIT 1

**STATE OF ILLINOIS  
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION  
DIVISION OF PROFESSIONAL REGULATION**

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois,	Complainant,	) ) ) )
v.		) No. 2017-02069
Reno Ahuja, M.D., License No. 036-128348,	Respondent.	) )

**CONSENT ORDER**

The Department of Financial and Professional Regulation, Division of Professional Regulation, of the State of Illinois, by Vladimir Lozovskiy, one of its attorneys. (hereinafter the "Department") and Reno Ahuja, M.D. (hereinafter the "Respondent"), through Scott D. Hammer, her attorney, hereby agree to the following:

**STIPULATIONS**

Reno Ahuja, M.D. is licensed as a Physician and Surgeon in the State of Illinois, holding Illinois Physician and Surgeon License No. 036-128348. Said license is in Active status. At all times material to the matter(s) set forth in this Consent Order, the Department of Financial and Professional Regulation, Division of Professional Regulation, of the State of Illinois had jurisdiction over the subject matter and parties herein.

Information has come to the attention of the Department that alleges that Respondent prescribed Controlled Substances without renewing her Illinois Controlled Substance License. While this matter was pending, the Department also received information that Respondent failed to appropriately evaluate and treat a patient of her practice while the patient was experiencing acute psychiatric episode. The allegation(s) as set forth herein, if proven to be true, would constitute grounds for suspending, revoking or other discipline of Respondent's license as a

Physician and Surgeon, on the authority 225 Illinois Compiled Statutes, Paragraph 60/22(A)(5) and (33).

Subsequently, the Department held an informal conference in this matter on November 6, 2019. Karen O'Mara, D.O. and Shami Goyal, M.D. were present on behalf of the Medical Disciplinary Board and Vladimir Lozovskiy, regular staff attorney, appeared on behalf of the Department. Respondent appeared along with her attorney Scott D. Hammer. During informal conference, Respondent provided information regarding her educational background and experience and explained the issues that led to her failure to renew Illinois Controlled Substance License. In addition, Respondent described her care, treatment and evaluation of the patient-in-question.

For purposes of this Consent Order, Respondent neither admits nor denies the allegations, but she acknowledges that should this matter proceed to a contested hearing, the Illinois Medical Disciplinary Board (the "Board") could find a violation of the Medical Practice Act. Respondent has been advised of the right to a hearing, the right to contest any charges brought, and the right to administrative review of this Consent Order. Respondent knowingly waives each of these rights. Such waiver ceases if this Consent Order is rejected by either the Medical Disciplinary Board or the Director of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation.

Respondent and the Department have agreed, in order to resolve this matter, that Respondent, Reno Ahuja, M.D., be permitted to enter into a Consent Order with the Department, providing for the imposition of disciplinary measures which are fair and equitable under the circumstances and which are consistent with the best interests of the people of the State of Illinois.

### CONDITIONS

WHEREFORE, the Department, through Vladimir Lozovskiy, its regular staff attorney, and Reno Ahuja, M.D., Respondent, through Scott D. Hammer, her attorney, agree:

- A. Illinois Physician and Surgeon License of Reno Ahuja, M.D., License No. 036-128348, is hereby placed on indefinite probation for minimum of one (1) year;
- B. During a period of Probation, Respondent shall provide the Department with quarterly reports which include: (i) current residential address and contact telephone number as well as current practice location address and contact telephone number; (ii) address and contact information for each healthcare entity where Respondent has admitting privileges and/or employed; (iii) names of all the subordinates that are employed and/or supervised by Respondent during the reporting quarter; (iv) description of job duties, responsibilities and name of immediate supervisor and/or Department's Chairperson; (v) copy of any and all incident reports within the prior quarter filed against Respondent; and (vi) information, regarding any arrests, criminal, or civil actions filed, including DUI and/or other similar offenses against the Respondent; (vii) Respondent shall notify the Department of any adverse action taken against her related to the practice of medicine by another entity including but not limited to licensing authorities, insurance companies, and state and federal agencies, within ten (10) days of said adverse action; and (viii) Respondent shall notify the Department when she is the subject of any investigation initiated by another entity, including but not limited to licensing authorities, insurance companies, and state and federal agencies, within ten (10) days of said investigation;
- C. During a period of Probation, Respondent shall notify the Department's Chief of



Probation Investigations in writing of any change in employment and/or home address and/or telephone number within ten (10) days;

D. During a period of Probation, Respondent shall request the designated person from every healthcare entity, where she is practicing medicine/utilizing her Physician and Surgeon License, to submit quarterly reports to the Department regarding any issues arising out of her employment and practice of medicine;

E. Within 60 days of the final approval of this Consent Order, Respondent shall obtain a practice monitor, who is a licensed Physician and Surgeon in the State of Illinois. Said practice monitor cannot be affiliated with Respondent's practice. Said practice monitor shall have an unrestricted Illinois Physician and Surgeon License that has never been disciplined by any state and/or federal agencies. The practice monitor shall be hired at the expense of Respondent and shall be pre-approved by the Chief Medical Coordinator of the Department. Respondent shall request that her practice monitor submit quarterly reports about scope and performance appraisals. On a quarterly basis the practice monitor shall meet with Respondent and randomly select and review ten (10) charts of patients who have been seen by Respondent during the quarter. The practice monitor shall review the charts of those patients and submit independent quarterly reports to the Department evaluating the scope, appropriateness, and quality of medical care rendered by Respondent;

F. During a period of Probation, the practice monitor shall agree to inform the Department immediately if there is evidence of inappropriate behavior, professional misconduct, a violation of Respondent's probation or any violation of the laws and rules governing the practice of medicine;

G. During a period of Probation, Respondent shall notify the Department's Probation Unit within 10 (ten) days should her relationship with any practice monitor cease. Respondent

shall submit to the Department's Chief Medical Coordinator a name of a new practice monitor within 30 days from the date of the initial Notice:

H. Respondent is required to submit a proof of completion of ten (10) Category I CMEs in the area of psychiatric emergencies and ten (10) Category I CMEs in the area of professional responsibility. Said CME credits are not allowed to be counted towards regularly required CME credits pursuant to the Illinois Medical Practice Act;

I. Respondent shall pay a Fine in the amount of \$5,000.00 (five thousand dollars) being due within twelve (12) months of the effective date of this Consent Order. Respondent shall submit a check payable to: the Illinois Department of Financial and Professional Regulation. Said fine shall be mailed to Illinois Dept. of Financial and Professional Regulation, Attention: CMU/Accounts Receivable - Fine Payments, 320 W. Washington St., 3<sup>rd</sup> Floor, Springfield, Illinois 62786;

J. Respondent shall ensure that all the reports required to be submitted under the terms of this Probation shall be filed with the Department no later than 1/10, 4/10, 7/10 and 10/10 of each year during the full term of the Probation;

K. Respondent agrees that a violation of the terms and conditions of this Consent Order or a violation of the terms of probation is a violation of 225 ILCS 60/22(A)(15);

L. Respondent shall not violate the Illinois Medical Practice Act of 1987, any other federal and state laws related to the practice of medicine as well as any other federal and state laws;

M. If Respondent violates any of the terms and conditions of this Order, the Director of the Division of Professional Regulation may issue an Order forthwith mandating the automatic, immediate, indefinite suspension of Respondent's Illinois Physician License for a minimum of twelve (12) months. This indefinite suspension shall not

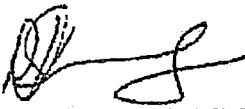
preclude the Department from taking any other disciplinary or other actions it deems appropriate. In the event Respondent contests in writing (by the filing of an appropriate petition with the Department) the factual basis underlying said indefinite suspension within thirty (30) days of the imposition thereof, then Respondent shall be afforded a hearing on the merits within thirty (30) days from filing of said petition;

N. This Consent Order shall become effective immediately after it is approved by the Director of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation.

7/13/2021  
DATE

Vladimir Lozovskiy  
Vladimir Lozovskiy, Attorney for the Department

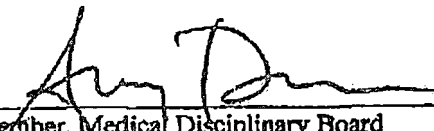
7/8/2021  
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Reno Ahuja, M.D., Respondent

7/8/21  
DATE

Scott D. Hammer  
Scott D. Hammer, Attorney for Respondent

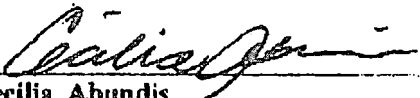
7/21/2021  
DATE

  
Member, Medical Disciplinary Board

The foregoing Consent Order is approved in full.

DATED THIS 23rd day of August, 2021.

**DEPARTMENT OF FINANCIAL AND  
PROFESSIONAL REGULATION of  
the State of Illinois, Mario Treto, Jr., Acting Secretary,  
Division of Professional Regulations**

  
\_\_\_\_\_  
Cecilia Abundis  
Acting Director

REF: Case No. 2017-02069/ License No. 036-128348