

1 TODD SPITZER, DISTRICT ATTORNEY
2 COUNTY OF ORANGE, STATE OF CALIFORNIA
3 DIRAN H. TASHJIAN, DEPUTY DISTRICT ATTORNEY (SBN 259192)
4 300 N. FLOWER STREET
5 SANTA ANA, CALIFORNIA 92703
6 TELEPHONE: (714) 834-3600
7 EMAIL: diran.tashjian@ocdapa.org

8 Attorneys for Plaintiff,
9 The People of the State of California

10 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **IN AND FOR THE COUNTY OF ORANGE,**
12 **West K.C.**
13 **~~CENTRAL~~ JUSTICE CENTER**

14 THE PEOPLE OF THE STATE OF
15 CALIFORNIA,

16 Plaintiff,

17 vs.

18 ARIAN MOWLAVI, M.D., an individual;
19 A.M. COSMETIC SURGERY CLINICS, INC.
20 a California corporation;
21 ANDREW JOSEPH REYES, an individual;
22 LAGUNA SURGERY INSTITUTE, LLC, a
23 California company;
24 LOUIS JAMES GARDNER, an individual;

25 DOES 1-10;

26 Defendants.

CASE NO.: 30-2023-01331633-CU-BT-WJC

ASSIGNED FOR ALL PURPOSES TO:
Judge Sheila Recio

**COMPLAINT FOR CIVIL PENALTIES
AND INJUNCTIVE RELIEF FOR
VIOLATION OF BUSINESS &
PROFESSIONS CODE SECTIONS
17200 AND 17500**

Filing Fees Exempt (Gov't Code § 6103)

1 The People of the State of California, by and through Todd Spitzer, District Attorney
2 for the County of Orange, based on information and belief, hereby alleges as follows:

3 **INTRODUCTION**

4 1. This case stems from the unlawful and unfair business practices, and false and
5 misleading advertising, relating to medical procedures offered and performed by the
6 Defendants named herein, and the additional DOE defendants whose identity is not yet known.

7 2. The People allege that, in so doing, Defendants engaged in unlawful, unfair, and
8 fraudulent business practices and in false and/or misleading advertising, in violation of
9 California's False Advertising and Unfair Competition Laws. (Cal. Bus. & Prof. Code §§
10 17200 & 17500 et seq.) This action seeks civil penalties, restitution, and injunctive relief
11 against Defendants for these violations.

12 **PLAINTIFF**

13 3. Todd Spitzer, as District Attorney of the County of Orange, by Diran H.
14 Tashjian, Deputy District Attorney, acting to protect the public from unfair, unlawful and
15 fraudulent business practices, bring this action in the public interest on behalf of the People.
16 As such, the Plaintiff in this action includes the People of the State of California (hereinafter,
17 the "Plaintiff" or the "People").

18 4. Pursuant to Business and Professions Code sections 17203, 17204, and 17206,
19 Prosecutors may bring a civil action in the name of the People of the State of California to
20 enjoin any person who engages, has engaged, or proposes to engage in unfair competition, as
21 defined in California Business and Professions Code section 17200, and to seek civil penalties
22 for each unlawful act or act of unfair competition.

23 5. The violations of law alleged hereinafter described have been carried out wholly
24 or in part within the County of Orange. The alleged actions of Defendant, as set out below, are
25 in violation of the laws and public policies of the State of California and are inimical to the
26 rights and interests of the general public. Unless enjoined and restrained by an order of the
27 Court, Defendant may continue to engage in the unlawful acts and courses of conduct set out
28 herein.

1 since 2015, and the Secretary of State File No. for LSI is 201500310005. LSI's Articles of
2 Organization states that all limited liability company members will manage LSI. MOWLAVI is
3 identified as the sole manager and/or member of LSI, and is identified as the Chief Executive
4 Officer of LSI in its Statement of Information filed in 2023.

5 11. ANDREW JOSEPH REYES (hereinafter "REYES"), LOUIS JAMES
6 GARDNER (hereinafter "GARDNER"), and DOES 6 through 10, were employees and/or
7 agents of Defendants CPSI, and LSI.

8 12. Plaintiff alleges that at all relevant times herein, REYES, GARDNER, and
9 DOES 6-10, were employees and/or agents of Defendants CPSI and LSI, while MOWLAVI
10 maintained a significant, if not sole, management and ownership interest in CPSI and LSI.

11 13. Plaintiff is ignorant of the true names and capacities of Defendants sued herein
12 as DOES 1-10, inclusive, and therefore sues these Defendants by such fictitious names.
13 Plaintiff will amend this complaint to allege their true names and capacities when ascertained.

14 **JURISDICTION AND VENUE**

15 14. At the relevant time period in this case, Defendants performed medical
16 procedures, transacted business, entered into contracts, and controlled a place of business in the
17 County of Orange, in the State of California. Defendants' advertisement of services – was
18 generated in, disseminated through, and viewed by potential patients, including people located
19 in the County of Orange, in the State of California. The conduct in violation of the statutory
20 authorities as alleged herein occurred in the County of Orange, in the State of California.

21 15. Jurisdiction and venue are proper in this Court pursuant to California Code of
22 Civil Procedure Section 395 and 395.5 because conduct giving rise to liability occurred in the
23 County of Orange, including but not limited to the outpatient surgery center located 32406
24 Coast Highway, Laguna Beach, CA, and other medical facilities and hospitals within the
25 County of Orange, in the State of California. This Court further has jurisdiction pursuant to
26 article 6, section 10, of the California Constitution.

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GENERAL ALLEGATIONS

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2 16. On a daily basis, for at least four years leading up to the filing of this complaint,
3 Defendant MOWLAVI maintained a cosmetic/plastic surgery practice at CPSI and LSI located
4 at 32406 Coast Highway, Laguna Beach, CA. MOWLAVI, through CPSI and/or LSI,
5 employed REYES, GARDNER, and DOES 6-10, as employees, independent contractors,
6 and/or agents. MOWLAVI maintained direct and supervisory authority over REYES,
7 GARDNER, DOES 6 through 10, and all other employees and/or agents of CPSI and/or LSI.

8 17. On a daily basis, for at least four years leading up to the filing of this complaint,
9 Defendants MOWLAVI, and DOES 1-5, authorized, instructed, and permitted REYES,
10 GARDNER, and DOES 6-10, to perform pre-operative care, medical procedures and surgeries,
11 and related post-operative care at CPSI and/or LSI. In doing so, MOWLAVI, and DOES 1-5,
12 aided and abetted REYES, GARDNER, and DOES 6-10, in performing procedures only
13 licensed individuals may perform, in direct violation of Business and Professions Code section
14 2052(b). REYES', GARDNER's, and DOES 6-10's performance of pre-operative care,
15 medical procedures and surgeries, and related post-operative care at CPSI and LSI on a daily
16 basis, for at least four years leading up to the filing of this complaint, constitutes the unlicensed
17 practice of medicine in violation of Business and Professions Code section 2052(a).

18 18. On a daily basis, for at least four years leading up to the filing of this complaint,
19 Defendants MOWLAVI, REYES, GARDNER, and DOES 1-10, also engaged in unlawful
20 business practices through the following acts:

- 21 a. removed the clothing of potential patients and patients without consent;
- 22 b. touched potential patients and patients without consent;
- 23 c. asserted derogatory comments to potential patients and patients without
24 consent;
- 25 d. caused the display of the bodies and/or body parts of potential patients
26 and patients to other third parties present at CPSI and LSI without
27 consent;
- 28 e. performed medical procedures on patients without their informed

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- consent and without explanation of all the risks associated with such procedures;
- f. failed to perform the consented medical procedures on patients;
- g. performed medical procedures on patients without providing proper post-operative care;
- h. performed medical procedures on patients without providing proper pre-operative care;
- i. performed unnecessary medical procedures;
- j. performed follow-up surgeries without proper recovery time from prior surgeries;
- k. performed medical procedures in a manner that fell below the applicable standard of care;
- l. performed multiple medical procedures in a manner that fell below the applicable standard of care, and which resulted in the disfigurement of patients and increased the susceptibility of patients to infection;
- m. pressured patients, while the patients were under the influence of medications and/or anesthesia, to change the scope of procedures to be performed;
- n. prescribed medications to patients without proper evaluation, testing, and diagnosis of patients;
- o. misrepresented the nature of the surgeries performed on patients by underestimating the nature and extent of scarring the patients would receive from procedures;
- p. misrepresented the recovery time and lasting effects from medical procedures;
- q. failed to specifically identify all procedures performed on patients;
- r. published photos and/or videos of clients on websites and social media without their consent;

1 s. refused to perform revisionary or corrective procedures on patients if
2 patients did not provide positive reviews of MOWLAVI on social
3 media;

4 19. On a daily basis, for at least four years leading up to the filing of this complaint,
5 Defendants MOWLAVI, REYES, GARDNER, and/or DOES 1-10, performed procedures on
6 clients that resulted in the removal of body parts and body tissue for the express purpose of
7 concealing infections and/or the body tissue impacted by those infections, that resulted from
8 the unlawful conduct of Defendants MOWLAVI, REYES, GARDNER, and DOES 1-10, at
9 CPSI and LSI.

10 20. On a daily basis, for at least four years leading up to the filing of this complaint,
11 Defendants REYES, GARDNER, and DOES 6-10, forged the name of MOWLAVI on
12 prescriptions written for clients of CPSI and LSI.

13 21. The unlawful conduct of Defendants MOWLAVI, REYES, GARDNER, and
14 DOES 1-10, impacted numerous patients over the course of at least four years leading up to the
15 filing of this complaint including some and/or all of the following patients also identified in
16 other civil actions filed on behalf of the same patients and whom are only being identified here
17 by their initials to protect their privacy: A.M.G.; G.G.; B.C.; B.H.; C.C.; C.J.; C.L.; C.S.J.;
18 D.P.; G.C.; J.H.; K.A.; K.M.; M.M.; L.G.; L.S.; M.P.; N.B.; S.L.; T.A.; V.S.; J.A.; J.L.A.;
19 X.A.; B.B.; M.E.; N.F.; A.G.; L.L.G.; E.L.; B.P.; M.S.; S.S.; D.V.; R.V.; K.D..

20 22. The specific patients identified in the preceding paragraph were similarly
21 identified in the action filed on their behalf, particularly in the First Amended Complaint filed
22 in Orange County Superior Court Case No.: 30-2021-01238424-CU-MM-CJC on March 14,
23 2022. Defendants' unlawful conduct also extended to patients that have yet to be identified by
24 name, whose identities may be revealed during the course of discovery in this action.

25 23. The conduct toward the patients identified in the preceding paragraphs
26 constituted unlawful, unfair, and fraudulent business activities in direct violation of one or
27 more of the following authorities as to each of the individuals identified therein:

28 a. Bus. & Prof. Code § 2052(a) (*i.e.* unlawful medical practice);

- 1 b. Bus. & Prof. Code § 2052(b) (*i.e.* aiding and abetting unlawful medical
- 2 practice);
- 3 c. Bus. & Prof. Code § 2234 (*i.e.* unprofessional conduct);
- 4 d. Bus. & Prof. Code § 4324(a) (*i.e.* forgery of prescriptions);
- 5 e. Civil Code § 1710(3) (*i.e.* fraudulent concealment);
- 6 f. Civil Code § 3344 (*i.e.* appropriation of name or likeness);
- 7 g. Civil Code §§ 1572, 1709, 1710(1) (*i.e.* intentional misrepresentation);
- 8 h. Civil Code §§ 1572, 1709, 1710(1) (*i.e.* negligent misrepresentation);
- 9 i. Civil Code §§ 1714(a), 3333.1 and 3333.2 (*i.e.* medical negligence);
- 10 j. Penal Code § 203 (*i.e.* mayhem);
- 11 k. Penal Code § 242 (*i.e.* battery);
- 12 l. Penal Code § 243(d) (*i.e.* battery resulting in serious bodily injury);
- 13 m. Penal Code § 518 (*i.e.* extortion);
- 14 n. Medical Battery (*See Stewart v. Superior Court* (2017) 16 Cal.App.5th
- 15 87, 105; *Cobbs v. Grant* (1972) 8 Cal.3d 229, 239.

16 24. Robert Kachenmeister, M.D. is a board-certified plastic surgeon and chief of the

17 plastic surgery department at Providence Mission Hospital. Dr. Kachenmeister opined that

18 based on his experience with patients that were previously treated by MOWLAVI, he has

19 personally witnessed a pattern and practice of MOWLAVI performing unnecessary and

20 excessive procedures. Per Dr. Kachenmeister, the frequency of complications and poor results

21 by MOWLAVI's procedures are unacceptable and not within the standard of care. Dr.

22 Kachenmeister confirmed that surgical technicians such as REYES and GARDNER are not

23 permitted or licensed to provide post-operative care or perform surgical procedures.

24 25. On a daily basis, for at least four years leading up to the filing of this complaint,

25 Defendants MOWLAVI, GARDNER, REYES, and DOES 1-10, failed to maintain a sterile

26 medical environment before, during, and after the performance of medical procedures at CPSI

27 and LSI., and which resulted in patients contracting infections. Patients who underwent

28 procedures at CPSI and LSI were operated on by unlicensed individuals GARDNER, REYES,

1 and DOES 6-10, at the direction of MOWLAVI and DOES 1-5, instruments were used without
2 being cleaned between patients, single use handheld wands were reused between patients, fluid
3 drained from patients was commingled, the operating room was not cleaned between each and
4 every surgery, and individuals in the operating room did not comply with sterility protocols.
5 On November 5, 2019, the American Association for Accreditation of Ambulatory Surgery
6 Facilities (AAAASF) placed LSI on probationary accreditation status after multiple and
7 unsuccessful attempts by AAAASF to contact Defendant MOWLAVI about the environment at
8 CPSI and/or LSI.

9 Unlawful Transactions Made for the Purpose of Avoiding Financial Liability

10 26. Based on information and belief, and information provided in the filings
11 associated with Bankruptcy Petition #: 8:22-bk-10296-SC filed on or about February 21, 2022
12 in U.S. Bankruptcy Court, Central District of California (Santa Ana), and so to avoid and/or
13 minimize the potential financial liability for the conduct described herein, MOWLAVI
14 engaged in a series of actions in violation of California Civil Code section 3439.04(a)(1) (“the
15 Uniform Voidable Transactions Act”).

16 27. In the months prior to January 2021, MOWLAVI’s primary real estate and
17 personal property assets included properties with a total value in excess of \$13,000,000.00, and
18 CPSI business assets valued at approximately \$5,000,000.00.

19 28. In or about January 2021, MOWLAVI and his spouse, Ms. Sarvnaz
20 Homayounpour, transferred their marital community property assets described in the preceding
21 paragraph into The Mowlavi/Homayounpour Trust, dated January 12, 2021.

22 29. MOWLAVI, during testimony in §341 Hearings in March and April of 2022,
23 stated that business at CPSI and/or LSI decreased after website reporting relating to
24 MOWLAVI’s conduct at LSI and CPSI.

25 30. During the summer of 2021, CPSI and MOWLAVI faced an investigation by
26 the California Medical Board as a result of a wrongful death of a patient while under
27 MOWLAVI’s care. The investigation by the Medical Board stemmed from an incident
28 relating to MOWLAVI’s unlicensed medical staff, including REYES and GARDNER,

1 performing medical procedures on a patient, Irlanda Swarthout. Ms. Swarthout died from
2 complications relating to her surgery, and her autopsy revealed over fifteen punctures and
3 perforations to her kidneys.

4 31. In the summer of 2021, MOWLAVI also became aware of future financial
5 liability as a result of forthcoming medical malpractice claims directed toward MOWLAVI,
6 CPSI, and LSI, as described in the First Amended Complaint filed in Orange County Superior
7 Court Case No.: 30-2021-01238424-CU-MM-CJC.

8 32. In September of 2021, MOWLAVI transferred approximately \$13,000,000 of
9 real estate and personal property assets to his spouse through a September 8, 2021 Property
10 Agreement, resulting in the transfer of 90% (ninety percent) of the marital community property
11 real estate assets valued at \$12,542,000. Additionally, MOWLAVI's spouse received \$756,000
12 (50% of the marital community) E*Trade/Scotttrade account. In return, MOWLAVI received
13 CPSI that MOWLAVI self-valued at \$10,620,000.

14 33. With respect to CPSI's valuation at the time of the September 2021 transfer of
15 assets, no deduction appears to have been made for the medical malpractice claims, the August
16 2021 Medical Board of California Accusation, or decreases in revenue described during
17 MOWLAVI's testimony in March and April of 2022. No deductions were made although
18 MOWLAVI asserted that he suffered "harm to his reputation in his profession, trade, and/or
19 business, loss of business, emotional harm, exposure to contempt, ridicule, and shame" as a
20 result of social media attention toward himself and his businesses. MOWLAVI made these
21 assertions in the Complaint filed in Orange County Superior Court Case No. 30-2021-
22 01226133-CU-DF-CJC against a former patient.

23 34. On December 28, 2021, former patients filed their Complaint in Orange County
24 Case No. 30-2021-01238424-CU-MM-CJC, and the California Medical Board filed its First
25 Amended Accusation relating to the death of former patient on February 3, 2022.

26 35. On February 21, 2022, MOWLAVI filed for bankruptcy protection under
27 Chapter 11, and which required the filing of Schedules and Statements, including a Statement
28 of Financial Affairs.

1 consulted with MOWLAVI for the performance of medical procedures, distributed to potential
2 patients, and were otherwise available to the public.

3 41. According to “High Definition Liposuction”, eighty to ninety percent of
4 MOWLAVI’s practice constitutes VASER® liposuction. MOWLAVI describes VASER® as
5 “high-definition” liposuction that is “minimally invasive body contouring procedure that uses
6 ultrasound technology to melt fat. It is an advanced body sculpting technique that allows [a]
7 surgeon to remove unwanted fat surrounding [the] muscles to create a toned, athletic
8 appearance.” According to MOWLAVI, this procedure involves infiltration of the deep and
9 superficial layers of fat which leads to “stunning results” and “more high defined muscle
10 patterns and ...etching” than traditional liposuction. The outcomes are “really beautiful,”
11 “majestic,” and “real masterpieces.”

12 42. In “High Definition Liposuction”, MOWLAVI claims that he is “considered one
13 of the top body sculptors around the world,” has performed “over 15,000 procedures[,]” and is
14 “well-regarded as a world-renowned face, body, and breast sculptor because of his superior
15 outcomes and body transformations.”

16 43. At the end of the book, MOWLAVI’S services and staff are highlighted. The
17 book states, “To ensure optimum high definition results, it is critical to choose a surgeon that
18 offers a full spectrum high definition liposuction body contouring center.” It further states that
19 MOWLAVI’S surgical facilities offer “state of the art equipment,” a state certified operating
20 room that provides “a safe operative and postoperative recovery center[,]” and experienced
21 staff.

22 44. On a daily basis, for at least four years leading up to the filing of this complaint,
23 Defendant MOWLAVI engaged in unfair competition by falsely advertising medical
24 procedures in “High Definition Liposuction”, and repeated the false statements in those
25 advertisements to potential patients during in-person consultations. Contrary to MOWLAVI’s
26 advertising and statements that would lead consumers to believe that licensed surgeons would
27 perform the surgical procedures at CPSI and LSI, unlicensed individuals GARDNER and
28 REYES participated in and performed those surgeries.

1 50. On a daily basis, for at least four years leading up to the filing of this complaint,
2 the conduct alleged in paragraphs 1 through 48 as to MOWLAVI, GARDNER, REYES, CPSI,
3 LSI, and DOES 1-10, constituted unlawful, unfair, and fraudulent business practices under
4 California Business & Professions Code Section 17200.

5 51. The conducted alleged in paragraphs 1-25 and 39-48 as to Defendants
6 MOWLAVI, GARDNER, REYES, CPSI, LSI, and DOES 1-10, constitutes unlawful, unfair,
7 and fraudulent conduct in direct violation of one or more of the following authorities as to each
8 of the individuals identified therein:

- 9 a. Bus. & Prof. Code § 2052(a) (*i.e.* unlawful medical practice);
- 10 b. Bus. & Prof. Code § 2052(b) (*i.e.* aiding and abetting unlawful medical
11 practice);
- 12 c. Bus. & Prof. Code § 2234 (*i.e.* unprofessional conduct);
- 13 d. Bus. & Prof. Code § 4324(a) (*i.e.* forgery of prescriptions);
- 14 e. Civ. Code § 1710(3) (*i.e.* fraudulent concealment);
- 15 f. Civil Code § 3344 (*i.e.* appropriation of name or likeness);
- 16 g. Civil Code §§ 1572, 1709, 1710(1) (*i.e.* intentional misrepresentation);
- 17 h. Civil Code §§ 1572, 1709, 1710(1) (*i.e.* negligent misrepresentation);
- 18 i. Civil Code §§ 1714(a), 3333.1 and 3333.2 (*i.e.* medical negligence);
- 19 j. Penal Code § 203 (*i.e.* mayhem);
- 20 k. Penal Code § 242 (*i.e.* battery);
- 21 l. Penal Code § 243(d) (*i.e.* battery resulting in serious bodily injury);
- 22 m. Penal Code § 518 (*i.e.* extortion);
- 23 n. Medical Battery (*See Stewart v. Superior Court* (2017) 16 Cal.App.5th 87,
24 105; *Cobbs v. Grant* (1972) 8 Cal.3d 229, 239.

25 52. The conducted alleged in paragraphs 26-38 as to Defendant MOWLAVI
26 constitutes unlawful, unfair, and fraudulent conduct in direct violation of California Civil Code
27 section 3439.04(a) (“the Uniform Voidable Transactions Act”).

28 53. The conducted alleged in paragraphs 39-48 as to Defendants MOWLAVI,

1 CPSI, LSI, and DOES 1-5, constitutes unfair competition through false and misleading
2 advertising relating to the medical procedures MOWLAVI, GARDNER, REYES, and DOES
3 1-10, performed at CPSI and LSI, in violation of Civil Code section 1770(a)(5) and Business
4 and Professions Code Sections 651, 17500 and 17508. All such violations are also unlawful,
5 unfair, and fraudulent business practices that constitute unfair completion under California
6 Business & Professions Code Section 17200.

7 54. The People hereby seek civil penalties of up to \$2,500.00 per violation to the
8 maximum extent permitted by law against Defendants for these acts of unfair competition.

9 55. The People further hereby seek all appropriate injunctive relief pursuant to
10 Business and Professions Code Section 17203 and any applicable restitution in an amount to be
11 determined at trial.

12 **SECOND CAUSE OF ACTION**

13 **(VIOLATION OF BUSINESS AND PROFESSIONS CODE SECTIONS 17500 AND**
14 **17508 AGAINST DEFENDANTS)**

15 56. Plaintiff re-alleges the allegations of paragraphs 1-25 and 39-48 above as
16 though fully set forth herein.

17 57. Under Business and Professions Code Section 17500, it is “unlawful ... to make
18 or disseminate or cause to be made or disseminated before the public in this state, ... in any
19 newspaper or other publication, or any advertising device, or by public outcry or proclamation,
20 or in any other manner or means whatever, including over the Internet, any statement,
21 concerning ... services, professional or otherwise, or concerning any circumstance or matter of
22 fact connected with the proposed performance or disposition thereof, which is untrue or
23 misleading....” Under Business and Professions Code Section 17508, it is further “unlawful”
24 to “make any false or misleading advertising claim, including claims that (1) purport to be
25 based on factual, objective, or clinical evidence, (2) compare the product’s effectiveness or
26 safety to that of other brands or products, or (3) purport to be based on any fact.”

27 58. On a daily basis, for at least four years leading up to the filing of this complaint,
28 Defendants MOWLAVI, CPSI, and LSI, knowingly and willfully disseminated false and

1 misleading advertising to sell their plastic surgery and cosmetic treatments. These
2 advertisements were made in hard copy materials including but not limited to “High Definition
3 Liposuction”, verbal statements provided to potential patients directly in their clinics, and/or on
4 Defendants’ websites.

5 59. Defendants MOWLAVI, CPSI, and LSI, falsely advertised that competent
6 licensed surgeons would perform the surgical procedures at CPSI and LSI, although unlicensed
7 individuals GARDNER, REYES, and DOES 6-10, participated in and performed those
8 surgeries and associated pre-operative and post-operative care.

9 60. For each day that Defendants MOWLAVI, CPSI, and LSI, falsely advertised
10 services as alleged herein, and for each advertisement that was disseminated or viewed,
11 Defendant committed a violation of California Business and Professions Code Sections 17500
12 and 17508.

13 61. The People hereby seek civil penalties of up to \$2,500.00 per violation to the
14 maximum extent permitted by law for Defendant’s unlawful false and misleading advertising.

15 62. The People further hereby seek all appropriate injunctive relief pursuant to
16 Business and Professions Code Section 17535 and any applicable restitution in an amount to be
17 determined at trial.

18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

20 1. For civil penalties pursuant to Business and Professions Code section 17206
21 and for restitution, in amounts to be determined at trial;

22 2. An order, pursuant to Business and Professions Code section 17203,
23 permanently enjoining Defendants, and each of its managing officers or employees, from
24 violating the statutory authorities relating to the operation of outpatient facilities;

25 3. An order, pursuant to Business and Professions Code section 17203,
26 permanently enjoining and affirmatively requiring Defendants’ full compliance, and/or
27 forbidding their continued lack of compliance, with any and all applicable authorities relating
28 to the operation of outpatient facilities and performance of medical procedures therein;

1 4. An order, pursuant to Business and Professions Code section 17535,
2 permanently enjoining Defendants, and each of its managing officers and employees from
3 further false and misleading advertising in violation of California law;

4 5. Plaintiff's costs of inspection, investigation, enforcement, prosecution, and suit
5 herein, and any other applicable fees for prosecuting this action; and

6 6. Any such other relief as the Court may deem just and proper.

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9 DATED: June 19, 2023

10 TODD SPITZER, DISTRICT ATTORNEY
11 COUNTY OF ORANGE

12 By: 
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14 DIRAN H. TASHJIAN
15 Deputy District Attorney

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