
Clerk of the Superior Court
By Ruby Moreno, Deputy
Date 09/15/2026 Time 16:40:04
Description Amount
----- CASE# CV2026-038557 -----
CIVIL NEW COMPLAINT 367.00

TOTAL AMOUNT 367.00
Receipt# 31010410

1 David J. Hoffa
State Bar No. 038052
2 c/o Mark Spencer
P.O. Box 30042
3 Phoenix, AZ 85046
4 (989) 627-7757
davjhoffa@gmail.com
5 Attorney for Plaintiff, Judicial Watch, Inc.

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

7 MARICOPA COUNTY

8 JUDICIAL WATCH, INC.,) Maricopa County Superior Court
CV2026-038557
9 Plaintiff,) No. ~~CV 2026-038567~~

10 v.) COMPLAINT FOR SPECIAL ACTION

11 ARIZONA MEDICAL BOARD, a) (A.R.S. § 39-121.01)

12 professional regulatory board of the)

13 State of Arizona,)

14 Defendant.)

15 Plaintiff Judicial Watch, Inc. brings this special action against Defendant Arizona
16 Medical Board to compel compliance with the Arizona Public Records Law (“APRL”),
17 A.R.S §§ 39-121, et seq. Plaintiff alleges as follows:

18 PARTIES

19 1. Plaintiff Judicial Watch, Inc. is a not-for-profit, educational organization
20 incorporated under the laws of the District of Columbia and headquartered at 425 Third
21 Street SW, Suite 800, Washington, DC 20024. Plaintiff seeks to promote transparency,

1 accountability, and integrity in government and fidelity to the rule of law. As part of its
2 mission, Plaintiff regularly requests records from federal, state, and local governments
3 pursuant to open records laws. Plaintiff analyzes the responses and disseminates its
4 findings and the requested records to the American public to inform them about “what
5 their government is up to.”

6 2. Defendant Arizona Medical Board is a professional regulatory board of the State
7 of Arizona and a public body as defined in A.R.S. § 39.121.01(A)(2). Its duties include
8 investigating licensed medical professionals, A.R.S. § 32-1403(A)(2), and receiving and
9 reviewing complaints submitted against such professionals. A.R.S. § 32-1451(A). The
10 Board has possession, custody, and control of records to which Plaintiff seeks access.

11 JURISDICTION AND VENUE

12 3. This Court has jurisdiction over this action pursuant to A.R.S. § 39-121.02 and
13 Rule 3 of the Arizona Rules of Procedure for Special Actions (“RPSA”).

14 4. Venue is proper in this Court under RPSA 6(a)(2), because Defendant is a public
15 body of the State of Arizona.

16 GENERAL ALLEGATIONS

17 5. On October 27, 2025, Plaintiff served an APRL request on Defendant that
18 requested access to, among other records, “[a]ny complaints and/or communications
19 received by and/or exchanged with the [Arizona Medical Board (AZMB)], and/or any
20 AZMB investigations, conclusions, evaluations, recommendations, discipline, and/or
21 penalties involving: a. Sai Sruthi Raprolu and/or b. Atul Lalani[.]”

1 6. Plaintiff's request stated that the records were not sought for a commercial
2 purpose, and requested that Defendant provide an index of any responsive records that
3 are withheld from disclosure pursuant to A.R.S. § 39.121.01(D)(2).

4 7. The time frame of the request was identified as "January 1, 2023, to the
5 completion of this request."

6 8. A true and correct copy of Plaintiff's request is attached as **Exhibit A**.

7 9. On January 14, 2026, Defendant disclosed records and provided a letter
8 responding to Plaintiff's records request. A true and correct copy of this response is
9 attached as **Exhibit B**.¹

10 10. Absent from the disclosure were any complaints submitted to Defendant
11 concerning the licensees identified in Plaintiff's records request, despite the existence of
12 such complaints being indicated by several records that were disclosed. These disclosed
13 records further indicate that all of these complaints have been "dismissed" within the
14 meaning of that word as used in A.R.S. § 32-3214(A) and (C). True and accurate copies
15 of records disclosed by Defendant that indicate the existence of withheld responsive
16 dismissed complaints are attached as **Exhibit C**.

17 11. Defendant's response asserted that these complaints are exempt from
18 disclosure pursuant to A.R.S. § 32-1451.01(C) and (E).²

1 Defendant's letter was erroneously dated October 15, 2025.

2 Defendant's letter specifically stated that "complainants and documents that are part of
the Board's investigative file . . . are confidential pursuant to A.R.S. § 32-1451.01(C)
and (E), and are exempt from disclosure to the public and not obtainable by
subpoena[.]" Exhibit B at p. 1, but Judicial Watch's records request sought

12. On July 25, 2026, Plaintiff sent a letter to Defendant, arguing that the statutory provisions Defendant relied upon to withhold disclosure of the requested complaints do not apply, and demanding that Defendant disclose these complaints. A true and accurate copy of this demand letter is attached as **Exhibit D**.

13. On August 14, 2026, the Attorney General's Office provided to Plaintiff's counsel a letter in response to Plaintiff's demand letter. This letter included a withholdings index pursuant to A.R.S. § 39.121.01(D)(2), and reasserted Defendant's reliance upon A.R.S. § 32-1451.01(C) to withhold the complaints sought by Plaintiff's records request. Specifically, the letter asserted that the complaints constituted confidential "information received and records or reports kept by the board as a result of" Defendant's investigation procedures. A true and accurate copy of the Attorney General's Office's letter and withholdings index is attached as **Exhibit E**.

COUNT ONE

(Violation of A.R.S. § 39-121.01(D)(1) – Unlawful withholding of public records)

14. Plaintiff realleges and incorporates by reference paragraphs 1 through 13 as if fully stated herein.

15. The APRL grants every person the right to examine or be furnished with copies of public records. A.R.S. §§ 39-121 & 39-121.01(D). Arizona law defines public records broadly, *Griffis v. Pinal Cnty.*, 215 Ariz. 1, 4, ¶ 8 (2007), and creates a strong

“complaints” submitted to the Board concerning the identified licensees, not the identity of “complainants.” *See* Exhibit A at p. 1.

1 presumption of disclosure. *Judicial Watch, Inc. v. City of Phoenix*, 228 Ariz. 393, 395, ¶
2 10 (App. 2011).

3 16. A public body wishing to withhold or redact requested records bears the
4 burden of proving that the records meet the criteria for a statutory exemption from
5 disclosure. *Fisher v. Maricopa Cnty. Stadium Dist.*, 185 Ariz. 116, 121–22 (App. 1995)
6 (government must support nondisclosure with specific justifications).

7 17. Privileges must be “narrowly construe[d]” “because they are in derogation of
8 the search for truth.” *Fann v. Kemp*, 253 Ariz. 537, 542, ¶ 9 (2022) (quotation omitted).

9 18. When records contain confidential information, it is preferred, where possible,
10 for the record to be disclosed with the confidential information redacted, rather than to
11 leave the entire record withheld. *Judicial Watch*, 228 Ariz. at 396, ¶ 12.

12 19. Plaintiff has a right to inspect and be furnished copies of the records it
13 requested unless Defendant can satisfy its burden of justifying nondisclosure.

14 20. Defendant has violated the APRL by withholding responsive records without
15 statutory grounds. Specifically, A.R.S. § 32-1451.01(C) does not protect against
16 disclosure the dismissed complaints submitted to Defendant that Plaintiff sought through
17 its records request.

18 21. A.R.S. § 32-3214(A) makes records of a complaint available to the public
19 under the APRL when a health profession board, such as Defendant, dismisses a
20 complaint. A.R.S. § 32-3214(A) must be interpreted broadly to include a complaint itself,
21 given the APRL’s presumption favoring disclosure, *Judicial Watch*, 228 Ariz. at 395, ¶

1 10, and the broad definition of “public records.” *Griffis*, 215 Ariz. at 4, ¶ 8. Indeed,
2 A.R.S. § 32-3214(C) specifically designates “dismissed complaints” to be disclosable
3 public records under the APRL. *See also* A.R.S. § 32-3201(1)–(2) (defining the Arizona
4 Medical Board as a “health profession regulatory board” to which A.R.S. § 32-3214(A)
5 and (C) apply).

6 22. A.R.S. § 32-1451.01(C) makes confidential “[p]atient records, including
7 clinical records, medical reports, laboratory statements and reports, any file, film, other
8 report or oral statement relating to diagnostic findings or treatment of patients, any
9 information from which a patient or the patient’s family might be identified or any
10 information received and records or reports kept by the board as a result of the
11 investigation procedure outlined in this chapter[.]” The term “information received and
12 records or reports kept by the board as a result of” investigations must be read to
13 encompass only information, records, and reports of the same nature as the preceding
14 enumerated classes of protected materials, *Estate of Braden v. State*, 228 Ariz. 323, 326, ¶
15 13 (2011) – *i.e.*, information and materials containing medical or identifying information
16 of patients or their families. *See Lipschultz v. Superior Court*, 128 Ariz. 16, 17–19 (1981)
17 (letters that were provided to Medical Board by doctor during the course of a medical
18 malpractice investigation held confidential); *Arizona Board of Medical Examiners v.*
19 *Superior Court*, 186 Ariz. 360, 361–62 (App. 1996) (psychological evaluation report
20 concerning a doctor that had been ordered by the Medical Board in the course of an
21 investigation into that doctor held confidential).

23. Additionally, A.R.S. § 32-1451.01(C) protects only information received and records kept by the Board “as a result of” an investigation, but a complaint is a record that may catalyze an investigation; it is not a record that is a “result of” an investigation. *See Lipschultz*, 128 Ariz. at 18–19 (letters created because of a Board investigation were privileged, but medical records created before initiation of a Board investigation may be discoverable).

24. But even if A.R.S. § 32-1451.01(C) standing alone on its own terms could be interpreted to cover dismissed complaints, this provision’s general terms (which concern “information received,” “records,” and “reports”) must nonetheless yield to the more specific provisions of A.R.S. § 32-3214(A) and (C) (which concern “dismissed complaints”). *Friedemann v. Kirk*, 197 Ariz. 616, 618, ¶ 9 (App. 2000).

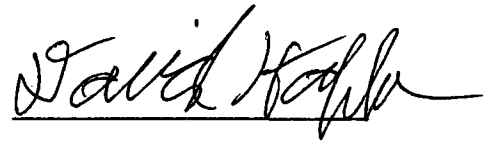
25. Read in light of the APRL’s disclosure presumption, *Judicial Watch*, 228 Ariz. at 395, ¶ 10, and the requisite narrow construction of privileges, *Fann*, 253 Ariz. at 542, ¶ 9, and when read in conjunction under applicable canons of statutory interpretation, A.R.S. § 32-3214(A) and (C) and A.R.S. § 32-1451.01(C) leave complaints that were submitted to and dismissed by Defendant available for public inspection and disclosure under the APRL.

26. To the extent protected information might be contained within these complaints, these complaints should nonetheless, if possible, be disclosed with appropriate redactions rather than withheld entirely. *Judicial Watch*, 228 Ariz. at 396, ¶ 12.

1 C. Awarding attorney's fees and other legal costs reasonably incurred by Plaintiff
2 in this action pursuant to A.R.S. § 39-121.02(B) and RPSA 7(i); and

3 D. Granting Plaintiff such other and further relief as the Court deems just and
4 proper.

5
6 **RESPECTFULLY SUBMITTED** on September 1~~4~~⁵, 2026.



7
8 David J. Hoffa

9 State Bar No. 038052

10 c/o Mark Spencer

11 P.O. Box 30042

12 Phoenix, AZ 85046

13 (989) 627-7757

14 davjhoffa@gmail.com

15 *Attorney for Plaintiff*

EXHIBIT A



**Judicial
Watch®**
*Because no one
is above the law!*

October 27, 2025

CERTIFIED MAIL

Annabel Augugliaro, Investigator
Arizona Medical Board
1740 W. Adams
Suite 4000
Phoenix, AZ 85007

**Re: Records under Public Records Law
A.R.S. § 39-101 through 39-221**

Ms. Augugliaro;

The Arizona Medical Board ("AZMB") is permitted to investigate medical complaints involving licensed physicians, such complaints to include but not limited to unprofessional conduct and/or medical ineptitude. A.R.S. § 32-1451 states (*in part*), "The board on its own motion may investigate any evidence that appears to show that a doctor of medicine is or may be medically incompetent, is or may be guilty of unprofessional conduct or is or may be mentally or physically unable safely to engage in the practice of medicine... Any person may (*emphasis mine*), and a doctor of medicine, the Arizona medical association, a component county society of that association and any health care institution shall (*emphasis mine*) report to the board any information that appears to show that a doctor of medicine is or may be medically incompetent, is or may be guilty of unprofessional conduct or is or may be mentally or physically unable safely to engage in the practice of medicine.

Pursuant to the provisions of the Arizona Public Records Law (*APRL*), A.R.S. §39-101 through §39-221, and unless otherwise noted, within the date range of January 1, 2023, to the completion of this request, please provide copies of:

1. Any complaints and/or communications received by and/or exchanged with the AZMB, and/or any AZMB investigations, conclusions, evaluations, recommendations, discipline, and/or penalties involving:



ATUL LALANI, MD

Medical Director



Sai Sruthi Raprolu MBBS

East Valley Endocrinology Laboratory
9300 E. Ironwood Square Dr, Ste. 201

Medical Assistant

(480) 401-0583, Ext-1016

Website : www.eastvalleyendocrinology.net

Scottsdale

Endocrinology Institute

East Valley Endocrinology,

Diabetes & Metabolism

East Valley Endocrinology Laboratory

9300 E. Ironwood Square Dr, Ste. 201

Scottsdale, AZ 85258

Tel 480-664-8988

Fax 480-664-8998

- a. Sai Sruthi Raprolu and/or
 - b. Atul Lalani
2. Any AZMB communications exchanged, produced, and/or received regarding MD-25-0535A
 3. In the context of A.R.S. § 32-1432 et seq., any AZMB documents, to include but not limited to policies, rules, guidelines, definitions, procedures, and/or practices, pertaining to the Transitional Training Program ("TTP") addressing:
 - a. Participation of Foreign Medical Graduates and/or International Medical Graduates
 - b. Number and/or location of TTP permit holders (*permittees*)
 - c. Training stipulations/requirements in TTP contracts
 - d. Objective standards utilized in the evaluation of TTP permittees
 - e. Proficiency performance evaluations of TTP permittees (*A.R.S. § 32-1432.04.D.8*)
 - f. Requirement of direct in-person supervision by an attending physician (*proctor – direct/indirect supervision*) in the rendering of medical services by TTP permittees
 - g. Audits of direct in-person proctor supervision of TTP permittees
 - h. Standard(s) and/or method(s) utilized to determine if a permittee is a lawfully authorized medical graduate in training
 - i. Compliance documentation of the aforementioned determination standard and/or method
 - j. Visible name and/or service identification requirements (*i.e. badges*) for TTP permittees engaged in clinical services
 - k. Eligible entities
 - l. Audits of eligible entity reports (*A.R.S. § 32-1432.04.G*)
 - m. Standard and/or method utilized for compliance with and/or documentation of permittees as addressed in A.R.S. § 32-1432.04.K
 - n. Standard and/or method utilized for compliance with and/or documentation of permittees as addressed in A.R.S. § 32-1432.04.L.3
 - o. Sanctions, evaluations and/or terminations of proctors
 - p. Compliance, authority, requirements, tracking, and/or allowances of proctors and/or permittees with/under the Arizona Prescription Monitoring Program (*e.g. DEA number used by permittees, required signature for narcotics, etc.*)
 4. Any AZMD documents addressing medical billing fraud and/or discrepancies involving proctors and/or permittees involved in the TTP

These records are considered public under A.R.S. §39-101 through §39-221. To the extent applicable, the following definitions apply to the request:

"COMMUNICATION(S)" means every manner or method of disclosure, exchange of information, statement, or discussion between or among two or more persons, including but not limited to, face-to-face and telephone conversations, correspondence, memoranda, telegrams,

telexes, email messages, voice-mail messages, text messages, electronic messaging (including instant messaging and chats delivered through Microsoft Teams, Google Workspace, Zoom Team Chat, or other similar systems), meeting minutes, discussions, releases, statements, reports, publications, and any recordings or reproductions thereof.

“DOCUMENT(S)” or “RECORD(S)” mean any kind of written, graphic, or recorded matter, however produced or reproduced, of any kind or description, whether sent, received, or neither, including drafts, originals, non-identical copies, and information stored magnetically, electronically, photographically or otherwise. As used herein, the terms **“DOCUMENT(S)”** or **“RECORD(S)”** include, but are not limited to, studies, papers, books, accounts, letters, diagrams, pictures, drawings, photographs, correspondence, telegrams, cables, text messages, emails, memoranda, notes, notations, work papers, intra-office and inter-office communications, communications to, between and among employees, contracts, financial agreements, grants, proposals, transcripts, minutes, orders, reports, recordings, or other documentation of telephone or other conversations, interviews, affidavits, slides, statement summaries, opinions, indices, analyses, publications, questionnaires, answers to questionnaires, statistical records, ledgers, journals, lists, logs, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, computer printouts, tapes, discs, microfilm, and all other records kept, regardless of the title, author, or origin.

“PERSON” means individuals, entities, firms, organizations, groups, committees, regulatory agencies, governmental entities, business entities, corporations, partnerships, trusts, and estates.

“REFERS,” “REFERRING TO,” “REGARDS,” REGARDING,” “RELATES,” “RELATING TO,” “CONCERNS,” “CONCERNING” or **“PERTAINS TO”** mean, containing, alluding to, responding to, commenting upon, discussing, showing, disclosing, explaining, mentioning, analyzing, constituting, comprising, evidencing, setting forth, summarizing, or characterizing, either directly or indirectly, in whole or in part.

Pursuant to A.R.S. §39-121.01.D.1, records must be furnished promptly. We look forward to your prompt response. Any response or records that can be delivered via e-mail attachments are certainly acceptable. Additionally, all responsive records in an electronic format (“PDF” is preferred) is appreciated. We also are willing to accept a “rolling production” of responsive records if it will facilitate a more timely production.

If any responsive record or portion thereof is claimed to be exempt from production, please provide sufficient identifying information with respect to each allegedly exempt record or portion thereof to allow us to assess the propriety of the claimed exemption (*A.R.S. §39-121.01.D.2.*) Additionally, any reasonably segregable portion of a record otherwise exempt from disclosure is required to be made available after deletion of the portions that are exempted by law.

Finally, the information sought is for non-commercial purposes. If there are any fees for searching and/or copying these records, please inform me if the cost will exceed \$300.00. However, I would also like to request a waiver of all fees in that the disclosure of the requested information is in the public interest. Please be advised that if the records are not provided to our

office or if we do not hear from the Board, we will assume that the Board is refusing to comply with our Public Records Request. If you do not understand this request or any portion thereof, or if you feel you require clarification of this request or any portion thereof, please contact us immediately at 602.510.7875 or m Spencer@judicialwatch.org. The local Arizona address is:

Judicial Watch Inc.
PO Box 30042
Phoenix, AZ 85046

Sincerely,

A handwritten signature in black ink, appearing to be 'M Spencer', written over a horizontal line.

MARK SPENCER
Southwest Projects Coordinator
Judicial Watch, Inc.

EXHIBIT B



Arizona Medical Board

1740 W. Adams, Suite 4000 • Phoenix, AZ 85007

Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2702

Website: www.azmd.gov

October 15, 2025

Mark Spencer
Southwest Project Coordinator
Judicial Watch Review Inc.
PO Box 30042
Phoenix, AZ 85046
Via Email: mspencer@judicialwatch.org

Dear: Mr. Spencer:

I am in receipt of your public information request regarding Sai S. Raprolu, M.D., license #R80737 and Atul Lalani, M.D., license# 33131. Enclosed with the cover letter are:

- Dr. Sai S Raprolu's Licensing File
- Dr. Atul Lalani's Licensing File

Regarding your request for complainants and documents that are part of the Board's investigative file, please note that they are confidential pursuant to A.R.S. § 32-1451.01(C) and (E), and are exempt from disclosure to the public and not obtainable by subpoena. *Lipschultz v. Superior Court*, 128 Ariz. 16, 623 P.2d 805 (1985); *Arizona Board of Medical Examiners v. Superior Court*, 186 Ariz. 360, 911 P.2d 924 (App. 1996).

Regarding your request for information about Transitional Training permits please see the attached policies:

- Transitional Training Permit Standard Operating Procedures
- Transitional Training Renewal Permit Standard Operating Procedures
- Investigative Process Policy

The Arizona Medical Board's website has the following information for your review and can be downloaded at your convenience.

- Additional licensing information about Transitional Training Permits is available under the Licensing tab
- A Transitional Training Permit Roster is available under the Find Your MD tab

Sincerely,

Heather Foster, MPH
Public Records Coordinator

From: Michelle Robles <michelle.robles@azmd.gov>
Sent: Wednesday, January 21, 2026 2:26 PM
To: Mark Spencer <M.Spencer@JUDICIALWATCH.ORG>
Cc: Heather Foster <heather.foster@azmd.gov>
Subject: Re: Arizona Medical Board Public Information Request - Dr. Lalani and Dr. Raproiu

Mr. Spencer,

With regard to confidentiality of the Board's investigations, the statutory provisions cited are very comprehensive and state in whole that patient records, including clinical records, medical reports, laboratory statements and reports, any file, film, other report or oral statement relating to diagnostic findings or treatment of patients, any information from which a patient or the patient's family might be identified or any information received and records or reports kept by the board as a result of the investigation procedure outlined in this chapter are not available to the public. Please note that the initial complaint is considered as any information received by the Board for the investigation and is therefore confidential.

Further, hospital records, medical staff records, medical staff review committee records and testimony concerning these records and proceedings related to the creation of these records are not

available to the public, shall be kept confidential by the board and are subject to the same provisions concerning discovery and use in legal actions as are the original records in the possession and control of hospitals, their medical staffs and their medical staff review committees. The board shall use such records and testimony during the course of investigations and proceedings pursuant to this chapter. For this reason, the records previously produced regarding specific Board investigations are the only public records available

With regard to your itemized requests for records related to the TTP, the Board does not perform many of the functions at issue,

- 3(c-e) are all the responsibility of an eligible entity, not the Board (see A.R.S. § 32-1432.04(D)(1-8)). The Board was not granted any additional authority in the statute regarding these requirements and has not issued any guidance regarding them.
- 3(f) the requirement of direct supervision is set forth in the statute. § 32-1432.04(D)(4) and (M). The Board has not issued any further guidance regarding this requirement.
- 3(g) the Board is not authorized by statute to conduct audits of direct in-person proctor supervision of transitional training permit holders. If a complaint was received alleging inappropriate supervision of a permit holder, that would be investigated in accordance with the Board's standard investigative policy, which was previously provided to you.
- 3(h-i) the Board has provided the applicable licensing policies regarding TTP applications that are responsive to these requests in the initial response.
- 3(j) this is set forth in statute § 32-1432.04(D)(6). The Board has not issued any guidance regarding this requirement.
- 3(k-l) eligible entities are required by statute to report this information to the Arizona Department of Health Services. You may want to request this information from the Department of Health Services.
- 3(m-n) the Board previously provided policies related to reporting by permit holders and supervising physicians. Information regarding the Transitional Training Permit forms, fees and statutes can be located on the Board's website: <https://www.azmd.gov/Licensure/Licensure#>
- 3(o) the Board would investigate any complaint regarding unprofessional conduct of a proctor in accordance with its regular investigation process policy.
- 3(p) the Board does not have authority to perform original compliance audits of CSPMP use- that would be performed by the Pharmacy Board in accordance with that board's statutes and processes and then reported to the Medical Board by the Pharmacy Board for potential investigation. The Board would investigate these reports in accordance with its regular investigation process policy.
- With regard to request 4- the Board does not have a separate policy for investigating billing fraud allegations of TTPs or their proctors, those would be investigated in accordance with the Board's regular investigation process policy.

Thank you,
Michelle Robles
Board Operations Manager
Arizona Medical Board
and Arizona Regulatory Board of Physician Assistants
Michelle.Robles@azmd.gov
(480)-551-2734

Confidentiality and Non-Disclosure Notice: This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and delete and/or destroy all copies of the original message.

On Tue, Jan 20, 2026 at 1:11 PM Mark Spencer <MSpencer@judicialwatch.org> wrote:

Heather,

Your prompt response to the attached Judicial Watch public records request (PRR) on January 14 was greatly appreciated. Thank you.

The three attached files you supplied were helpful in providing insight into requests 1 and 2. It was stated in the AMB response:

Regarding your request for complainants and documents that are part of the Board's investigative file, please note that they are confidential pursuant to A.R.S. § 32-1451.01(C) and (E), and are exempt from disclosure to the public and not obtainable by subpoena. *Lipschultz v. Superior Court*, 128 Ariz. 16, 623 P.2d 805 (1985); *Arizona Board of Medical Examiners v. Superior Court*, 186 Ariz. 360, 911 P.2d 924 (App. 1996).

Thus, regarding Atul Lalani, M.D., the following number of patient medical complaints and the AZMD Board's actions taken with each complaint were provided.

1. 102125	MD-24-1211A	No violation – complaint dismissed
2. 091624	MD-24-0088A	No violation – complaint dismissed
3. 030618	MD-17-0951A	No violation – complaint dismissed
4. 092217	MD-16-1555A	Advisory Letter and Order – no disciplinary action
5. 042916	MD-15-0770A	No violation – complaint dismissed
6. 062915	MD-15-0070A	No violation – complaint dismissed
7. 100215	MD-14-0901A	No violation – complaint dismissed
8. 080714	MD-13-1347A	No violation – complaint dismissed
9. 010208	MD-07-0612A	No violation – complaint dismissed

Being aware of privacy obligations of complainants' names and specific medical information, the basis for the complaints appears to be reasonably pertinent regarding a response from the AMB. The reasons/basis of the aforementioned complaints were not provided. Nowhere in the request did I ask for "complainants" nor was any investigative portion of the file, with or without names, requested. It seems as if "communications" and/or "complaints" should have warranted at least one of three responses; either 1.) provided with appropriate redactions, 2.) denied based upon unavailability or 3.) denied based upon statutory obligations and/or restrictions

The PRR also requested information as found under numerals 3 and 4 (see below), both of which focused on the TPP. It's possible that I did not see the AMB's response to these requests thus I am courteously hesitant in engaging JW legal counsel for input and resolution prior to reaching out to your team. If indeed the AMB does not have access to what was

requested or has determined that a response would fall outside of the legislative/statutory PRR obligations of the Board, a response indicating these options (or others) would be of great assistance on my end. And again, it's possible I may have missed what already had been sent or that the AMB's search for documents is still in process.

3. In the context of A.R.S. § 32-1432 et seq., any AZMB documents, to include but not limited to policies, rules, guidelines, definitions, procedures, and/or practices, pertaining to the Transitional Training Program ("TTP") addressing:
 - a. Participation of Foreign Medical Graduates and/or International Medical Graduates
 - b. Number and/or location of TTP permit holders (permittees)
 - c. Training stipulations/requirements in TTP contracts
 - d. Objective standards utilized in the evaluation of TTP permittees
 - e. Proficiency performance evaluations of TTP permittees (A.R.S. § 32-1432.04.D.8)
 - f. Requirement of direct in-person supervision by an attending physician (proctor - direct/indirect supervision) in the rendering of medical services by TTP permittees
 - g. Audits of direct in-person proctor supervision of TTP permittees
 - h. Standard(s) and/or method(s) utilized to determine if a permittee is a lawfully authorized medical graduate in training
 - i. Compliance documentation of the aforementioned determination standard and/or method
 - j. Visible name and/or service identification requirements (i.e. badges) for TTP permittees engaged in clinical services
 - k. Eligible entities
 - l. Audits of eligible entity reports (A.R.S. § 32-1432.04.G)
 - m. Standard and/or method utilized for compliance with and/or documentation of permittees as addressed in A.R.S. § 32-1432.04.K
 - n. Standard and/or method utilized for compliance with and/or documentation of permittees as addressed in A.R.S. § 32-1432.04.L.3
 - o. Sanctions, evaluations and/or terminations of proctors
 - p. Compliance, authority, requirements, tracking, and/or allowances of proctors and/or permittees with/under the Arizona Prescription Monitoring Program (e.g. DEA number used by permittees, required signature for narcotics, etc.)
4. Any AZMD documents addressing medical billing fraud and/or discrepancies involving proctors and/or permittees involved in the TTP

I was able to attend (via Zoom) and subsequently review the Board's public meeting held on Wednesday, January 7, 2026. The comments, discussion, and concerns of the Board regarding Dr. James Verrees' issue/complaint were enlightening, reasonable, and forthcoming.



- "...it was disturbing the physician himself didn't see the patient at all..."
- "...the medical record problem is a systemic problem..."
- "...this is something that is happening all over the place..."
- "...they have exams that I know damn well they didn't have...it's laughable sometimes, so I don't know how we handle this anymore because it is so pervasive and universal... it's a mess"
- "...it's a Pandora's Box...it's required by Medicare to get a certain code...if we could fix it today I think we would all agree it needs to be fixed...I don't know how we get around it..."
- "...it's the physician's responsibility to read through the medical record before they electronically sign it..."
- "...these things are used for billing...this is rife and huge and a lot of this stuff is used for billing...wondering if the bully pulpit of the Medical Board could at least put forth something to people who could address this..."
- "...you have to go to the legislature...it's part of the stimulus package that came through with electronic medical records and then the mandate with Medicare and Medicaid that you have to subscribe to..."
- "...and the bottom line is electronic records were created for billing first and everything second..."
- "...by discussing it tonight we're putting the problem on the public record..."
- "Amen."
- "...this is not an Arizona issue, this is a national problem...it cannot get fixed here without fixing it across the country unfortunately...I look at records and think, 'Please God let me know what the doctor's thinking'..."
- "...this is kind of a sentinel case because this is the first one that came before us..."

The Board passed a unanimous motion to further investigate Dr. V's matter. The Board's concerns and decision appear to be consistent with what Dr. V presented and what JW requested.

If I was unclear in the Judicial Watch public records request, please let me know if I can assist you to facilitate a response from the AMB as to what was requested.

Again, thanks for what you provided last week.

Mark

602.510.7875

From: Heather Foster <heather.foster@azmd.gov>
Sent: Wednesday, January 14, 2026 5:12 PM
To: Mark Spencer <MSpencer@JUDICIALWATCH.ORG>
Subject: Arizona Medical Board Public Information Request - Dr. Lalani and Dr. Raprolu

Mr. Spencer:

Please see the attached files per your 10/27/2025 request.

Thank you,

Heather Foster, MPH
Public Records Coordinator
Arizona Medical Board and Arizona
Regulatory Board of Physicians Assistant
1740 W. Adams St., Suite 4000
Phoenix, AZ 85007
Email: heather.foster@azmd.gov
Ph: 480-551-2717

EXHIBIT C



Arizona Medical Board

1740 W Adams St, Suite 4000 • Phoenix, AZ 85007

Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704

Website: www.azmd.gov

October 21, 2025

Atul P. Lalani M.D.
9500 E. Ironwood Square Dr., Suite 201
Scottsdale, AZ 85258

**Re: Atul P. Lalani MD
Case # MD-24-1211A**

Dear Dr. Lalani:

You were previously provided notice that a complaint had been filed against your Arizona medical license. The Board's staff has reviewed the complaint referenced above, any response(s) you have filed regarding the complaint, and all relevant investigative findings. After reviewing all relevant information, the Board's staff has determined that the complaint does not establish a violation of the Arizona Medical Practice Act. Therefore, as required by Rule 4-16-507, I have dismissed the complaint and notified the complainant of that dismissal.

By law, the complainant may appeal this dismissal if they file their request within 35 days of the notification and they provide the required information. If the investigation is reinstated or reopened by the Board for any reason, you will be notified.

We appreciate your cooperation and patience during this process. Good luck in your medical practice.

Sincerely,

A handwritten signature in cursive script that reads "Raquel Rivera".

Raquel Rivera, MPH
Executive Director



Arizona Medical Board

1740 W Adams St, Suite 4000 • Phoenix, AZ 85007

Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704

Website: www.azmd.gov

September 16, 2024

Atul P. Lalani M.D.
9500 E. Ironwood Square Dr., Suite 201
Scottsdale, AZ 85258

**Re: Atul P. Lalani MD
Case # MD-24-0088A**

Dear Dr. Lalani:

You were previously provided notice that a complaint had been filed against your Arizona medical license. The Board's staff has reviewed the complaint referenced above, any response(s) you have filed regarding the complaint, and all relevant investigative findings. After reviewing all relevant information, the Board's staff has determined that the complaint does not establish a violation of the Arizona Medical Practice Act. Therefore, as required by Rule 4-16-507, I have dismissed the complaint and notified the complainant of that dismissal.

By law, the complainant may appeal this dismissal if they file their request within 35 days of the notification and they provide the required information. If the investigation is reinstated or reopened by the Board for any reason, you will be notified.

We appreciate your cooperation and patience during this process. Good luck in your medical practice.

Sincerely,

A handwritten signature in black ink that reads "Patricia E. McSorley". The signature is written in a cursive, flowing style.

Patricia E. McSorley
Executive Director



Arizona Medical Board

1740 W Adams St, Suite 4000 • Phoenix, AZ 85007

Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704

Website: www.azmd.gov

March 20, 2023

Atul P. Lalani M.D.
9500 E. Ironwood Square Dr., Suite 201
Scottsdale, AZ 85258

**Re: Atul P. Lalani MD
Case # MD-21-1128A**

Dear Dr. Lalani:

You were previously provided notice that a complaint had been filed against your Arizona medical license. The Board's staff has reviewed the complaint referenced above, any response(s) you have filed regarding the complaint, and all relevant investigative findings. After reviewing all relevant information, the Board's staff has determined that the complaint does not establish a violation of the Arizona Medical Practice Act. Therefore, as required by Rule 4-16-507, I have dismissed the complaint and notified the complainant of that dismissal.

By law, the complainant may appeal this dismissal if they file their request within 35 days of the notification and they provide the required information. If the investigation is reinstated or reopened by the Board for any reason, you will be notified.

We appreciate your cooperation and patience during this process. Good luck in your medical practice.

Sincerely,

A handwritten signature in black ink that reads "Patricia E. McSorley". The signature is written in a cursive style with a large, stylized "P" and "M".

Patricia E. McSorley
Executive Director



Arizona Medical Board

1740 W. Adams, Suite 4000 • Phoenix, AZ 85007

Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704

Website: www.azmd.gov • E-Mail: questions@azmd.gov

July 29, 2019

Atul P. Lalani M.D.
9500 E. Ironwood Square Dr
Suite 201
Scottsdale, AZ 85258

Re: Dr. Atul P. Lalani MD
Case # MD-19-0031A

Dear Dr. Lalani:

The Arizona Medical Board administratively closed your case after determining that the case was opened in error against the wrong physician.

Thank you for allowing the Board to review this matter.

Sincerely,

Patricia E. McSorley
Executive Director



Arizona Medical Board

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Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704

Website: www.azmd.gov

March 06, 2018

Atul P. Lalani M.D.
9500 E. Ironwood Square Dr
Suite 201
Scottsdale, AZ 85258

**Re: Atul P. Lalani MD
Case # MD-17-0951A**

Dear Dr. Lalani:

You were previously provided notice that a complaint had been filed against your Arizona medical license. The Board's staff has reviewed the complaint referenced above, any response(s) you have filed regarding the complaint, and all relevant investigative findings. After reviewing all relevant information, the Board's staff has determined that the complaint does not establish a violation of the Arizona Medical Practice Act. Therefore, as required by Rule 4-16-507, I have dismissed the complaint and notified the complainant of that dismissal.

By law, the complainant may appeal this dismissal if they file their request within 35 days of the notification and they provide the required information. If the investigation is reinstated or reopened by the Board for any reason, you will be notified.

We appreciate your cooperation and patience during this process. Good luck in your medical practice.

Sincerely,

A handwritten signature in black ink that reads "Patricia E. McSorley". The signature is written in a cursive, flowing style.

Patricia E. McSorley
Executive Director



Arizona Medical Board

9545 E. Doubletree Ranch Road, Scottsdale AZ 85258 • website: www.azmd.gov
Phone (480) 551-2700 • Toll Free (877) 255-2212 • Fax (480) 551-2707

December 19, 2017

Governor

Douglas A. Ducey

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Physician Member

R. Screven Farmer, M.D.
Vice-Chair
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Jodi Bain, Esq.
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Bruce A. Bethancourt, MD
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Teresa Connolly, D.N.P.
Public Member

Gary R. Figge, M.D.
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Pamela E. Jones
Public Member

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Edward G. Paul, M.D.
Physician Member

Wanda Salter, R.N.
Public Member/R.N.

Executive Director

Patricia E. McSorley

PERSONAL & CONFIDENTIAL

East Valley Endocrinology, Diabetes & Metabolism

Atul P. Lalani MD

9500 E. Ironwood Square Dr, Suite 201
Scottsdale, AZ 85258

Sent via secure e-mail to: [REDACTED]

**Re: Order for Continuing Medical Education Case Atul P. Lalani, M.D.
Case No. MD-16-1555**

Dear Dr. Lalani

This letter confirms the terms and conditions of the Board Order for Continuing Medical Education have been completed. Therefore, the Board Order is terminated.

Thank you for your cooperation regarding this matter. Please contact me if you have any questions.

Sincerely,

Kathleen Muller
Investigations Office
Office: (480) 551-2716 Fax: (480) 551-2702
kathleen.muller@azmd.gov



Arizona Medical Board

9545 E. Doubletree Ranch Road, Scottsdale AZ 85258 • website: www.azmd.gov
Phone (480) 551-2700 • Toll Free (877) 255-2212 • Fax (480) 551-2707

Governor

Douglas A. Ducey

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Physician Member

Edward G. Paul, M.D.
Physician Member

Wanda Salter, R.N.
Public Member/R.N.

Executive Director

Patricia E. McSorley

September 22, 2017

Matthew Cates
Jennings, Strouss & Salmon, Plc
One East Washington Street, Suite 1900
Phoenix, AZ 85004-2554

RE: Atul P. Lalani, M.D.
Case # MD-16-1555A

Dear Mr. Cates:

The purpose of this letter is to inform you that during the course of the September, 14, 2017, public meeting, the Arizona Medical Board (Board) reviewed the above-referenced complaint and all pertinent evidence and information gathered during the investigation. At the conclusion of its review, the Board voted to issue Dr. Lalani this Advisory Letter and Order for Non-Disciplinary CME for failing to provide a timely notification of discharge from the practice and for documentation of a provider note and ultrasound when the patient was not seen by the physician. There is insufficient evidence to support disciplinary action.

An advisory letter is a non-disciplinary action, and is not subject to review by either the Board or the Courts. See *Murphy v. Board of Medical Examiners of the State of Arizona*, 190 Ariz. 441, 949 P.2d 530 (App. 1997). However, the licensee may file a written response to the letter with the Board within thirty days after its receipt A.R.S. § 32-1451(E)(3). Please do not include medical records or third party opinions as part of your response. Also, please remember that your client is responsible for maintaining the confidentiality of any patient's identity. Finally, Board staff requests that the response not disclose the name of any medical consultant who may have reviewed the case or the name of any other healthcare provider associated with the matter in question.

If timely received, the response will be attached to the advisory letter and maintained in the licensee's permanent file.

Sincerely,

Michelle Robles
Board Coordinator
E-mail: boardcoordinator@azmd.gov

1 **BEFORE THE ARIZONA MEDICAL BOARD**

2 In the Matter of

3 **ATUL P. LALANI, M.D.**
4 Holder of License No. 33131
5 For the Practice of Allopathic Medicine
In the State of Arizona.

Case No. MD-16-1555A
ORDER FOR CONTINUING
MEDICAL EDUCATION
(NON-DISCIPLINARY)

6 At its public meeting on September 14, 2017, the Arizona Medical Board ("Board") voted to
7 issue Atul P. Lalani, M.D. ("Respondent"), a non-disciplinary Continuing Medical Education
8 ("CME") Order for failing to provide a timely notification of discharge from the practice and for
9 documentation of a provider note and ultrasound when the patient was not seen by the physician,
10 in violation of A.R.S. §§ 32-1401(27)(e) and (q). The Board, pursuant to A.R.S. § 32-1451(E)(2),
11 ordered Respondent to complete a minimum of 10 hours of Board staff pre-approved Category I
12 non-disciplinary CME in an intensive, in-person course regarding medical recordkeeping. The
13 CME requirement shall be completed within 6 months of the effective date of this Order. The CME
14 hours shall be in addition to the hours required for the biennial renewal of medical licensure.

15 **ORDER**

16 IT IS HEREBY ORDERED that within 6 months, Respondent shall complete a minimum of
17 10 hours of Board staff pre-approved Category I non-disciplinary CME in an intensive, in-person
18 course regarding medical recordkeeping. Respondent shall within thirty days of the effective date
19 of this Order submit his request for CME to the Board for pre-approval. Upon completion of the
20 CME, Respondent shall provide Board staff with satisfactory proof of attendance in satisfaction of
21 this requirement. The CME hours shall be in addition to the hours required for biennial renewal of
22 his medical license. Respondent's failure to complete the CME will subject him to future
23 disciplinary action by the Board. A.R.S. § 32-1401(27)(r).
24
25

RIGHT TO APPEAL

NOTICE IS HEREBY GIVEN that, pursuant to A.R.S. § 41-1092.03, any person aggrieved by this decision may apply to the Board, in writing, within thirty (30) days of receipt and request a public hearing with respect to this Order. You may request a hearing by filing a notice of appeal. The notice of appeal must be filed with the Board's Executive Director, and should include your name, address, the action being appealed, and a concise statement of the reasons for the appeal. If you request a public hearing, the hearing will be scheduled within sixty (60) days of receipt of your request. If you request a public hearing, you also have the right to request an informal settlement conference by filing a written request with the Board, pursuant to A.R.S. § 41-1092.06, no later than twenty (20) days before the scheduled hearing. The conference will be held within fifteen (15) days after receipt of your request. Please note that you waive any right to object to the participation of the Board's representative in the final administrative decision of the matter if it is not settled at the conference.

DATED this 22nd day of September, 2017

ARIZONA MEDICAL BOARD

By Patricia E. McSorley for
Patricia E. McSorley
Executive Director

EXECUTED COPY of the foregoing mailed
this 22nd day of September, 2017 to:

Matthew Cates
Jennings, Strouss & Salmon, PLC
One E Washington St, Suite 1900
Phoenix, AZ 85004-2554
Attorney for Respondent

1 ORIGINAL of the foregoing filed
this 2nd day of September, 2017 with:

2 Arizona Medical Board
3 9545 E. Doubletree Ranch Road
4 Scottsdale, AZ 85258

5 Mary Bobb
6 Board staff

MOTION PASSED.

H. CASES RECOMMENDED FOR ADVISORY LETTERS WITH NON-DISCIPLINARY CONTINUING MEDICAL EDUCATION ORDERS

MOTION: Dr. Farmer moved to issue an Advisory Letter and Order for Non-Disciplinary CME in item numbers 1, 4 and 5.

SECOND: Ms. Bain.

VOTE: 10-yay, 0-nay, 0-abstain, 0-recuse, 0-absent.

MOTION PASSED.

1. MD-16-0480A, TIMOTHY A. LUKE, M.D., LIC. #41183

RESOLUTION: Issue an Advisory Letter and Order for Non-Disciplinary for inadequate medical records. There is insufficient evidence to support disciplinary action. Within six months, complete no less than 15 hours of Board staff pre-approved Category I CME in an intensive, in-person course regarding medical recordkeeping. The CME hours shall be in addition to the hours required for license renewal.

2. MD-16-1555A, ATUL P. LALANI, M.D., LIC. #33131

Dr. Lalani and counsel Matt Cates addressed the Board during the Public Statements portion of the meeting. T.M.S. addressed the Board during the Public Statements portion of the meeting.

Dr. Gillard summarized that a template was created the day before by the medical assistant but was not signed or reviewed by the physician and commented that CME may not be needed. Dr. Figge noted that the physician should be aware when a medical assistant or staff edits their medical records.

MOTION: Dr. Figge moved to issue an Issue an Advisory Letter and Order for Non-Disciplinary CME for failing to provide a timely notification of discharge from the practice and for documentation of a provider note and ultrasound when the patient was not seen by the physician. There is insufficient evidence to support disciplinary action. Within six months, complete no less than 10 hours of Board staff pre-approved Category I CME in an intensive, in-person course for medical recordkeeping. The CME hours shall be in addition to the hours required for license renewal.

SECOND: Dr. Krahn.

VOTE: 10-yay, 0-nay, 0-abstain, 0-recuse, 0-absent.

MOTION PASSED.

3. MD-17-0404A, JOHN W. CORY, M.D., LIC. #36154

Ms. Smith clarified the statute violation in this case.

MOTION: Ms. Jones moved to Issue an Advisory Letter and Order for Non-Disciplinary CME for prescribing controlled substances without maintaining medical records, and for making a false or misleading statement to the Board. There is insufficient evidence to support disciplinary action. Within six months, complete no less than 15 hours of Board staff pre-approved Category I CME in an intensive, in-person course regarding ethics. The CME hours shall be in addition to the hours required for license renewal.

SECOND: Dr. Figge.

VOTE: 10-yay, 0-nay, 0-abstain, 0-recuse, 0-absent.

MOTION PASSED.

4. MD-16-1371A, MEHDY ZARANDY, M.D., LIC. #37894

RESOLUTION: Issue an Advisory Letter and Order for Non-Disciplinary CME for action taken by the State of Delaware, for failing to complete the CME required for Arizona license renewal, and for attesting to having completed the Arizona license renewal CME when he did not. There is insufficient evidence to support disciplinary action. Within 6 months, complete no less than 38.25 Board staff pre-



Arizona Medical Board

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June 29, 2015

Atul P. Lalani M.D.
9500 E. Ironwood Square Dr
Suite 201
Scottsdale, AZ 85258

**Re: Atul P. Lalani MD
Case # MD-15-0070A**

Dear Dr. Lalani:

You were previously provided notice that a complaint had been filed against your Arizona medical license, regarding your treatment of K██████N██████. The Board's staff has reviewed the complaint, any response(s) you have filed regarding the complaint, and all relevant investigative findings. After reviewing all relevant information, the Board's staff has determined that the complaint does not establish a violation of the Arizona Medical Practice Act. Therefore, as required by Rule 4-16-507, I have dismissed the complaint and notified the complainant of that dismissal.

By law, the complainant may appeal this dismissal if they file their request within 35 days of the notification and they provide the required information. If the investigation is reinstated or reopened by the Board for any reason, you will be notified.

We appreciate your cooperation and patience during this process. Good luck in your medical practice.

Sincerely,

A handwritten signature in cursive script that reads "Patricia E. McSorley".

Patricia E. McSorley
Executive Director



Arizona Medical Board

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Website: www.azmd.gov

October 02, 2014

Atul P. Lalani M.D.

Via email [REDACTED]

**Re: Atul P. Lalani MD
Case # MD-14-0901A**

Dear Dr. Lalani:

You were previously provided notice that a complaint had been filed against your Arizona medical license, regarding your treatment of F [REDACTED] G [REDACTED]. The Board's staff has reviewed the complaint, any response(s) you have filed regarding the complaint, and all relevant investigative findings. After reviewing all relevant information, the Board's staff has determined that the complaint does not establish a violation of the Arizona Medical Practice Act. Therefore, as required by Rule 4-16-507, I have dismissed the complaint and notified the complainant of that dismissal.

By law, the complainant may appeal this dismissal if they file their request within 35 days of the notification and they provide the required information. If the investigation is reinstated or reopened by the Board for any reason, you will be notified.

We appreciate your cooperation and patience during this process. Good luck in your medical practice.

Sincerely,

A handwritten signature in cursive script that reads "Patricia E. McSorley".

Patricia E. McSorley
Interim Acting Executive Director



Arizona Medical Board

9545 E. Doubletree Ranch Road, Scottsdale AZ 85258 • website: www.azmd.gov
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Governor

Douglas A. Ducey

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Physician Member

Robert E. Fromm, M.D.
Physician Member

Paul S. Gerding, Esq.
Public Member

Lois E. Krahn, M.D.
Physician Member

Edward G. Paul, M.D.
Physician Member

Wanda Salter, R.N.
Public Member/R.N.

Executive Director

Patricia E. McSorley

June 17, 2015

Atul P. Lalani, M.D.

Via Email [REDACTED]

RE: Atul P. Lalani, M.D.
Case #MD-13-1347A

Dear Dr. Lalani:

The Arizona Medical Board (Board) considered the above-referenced matter during the course of their June 3, 2015, public meeting.

Following a complete and thorough review of all pertinent and available information, the Board concluded that you were not in violation of the Medical Practice Act of the State of Arizona and, accordingly, dismissed the matter.

On behalf of the Board, thank you for allowing the Board to review this matter. Please note that the Board's decision is final and is not an appealable action.

Sincerely,

Amanda Schwabe

Amanda Schwabe

Board Coordinator

E-Mail: boardcoordinator@azmd.gov

after the completion dates of CME in prescribing and recordkeeping. Once the licensee has complied with the Probation, he must affirmatively request that the Board terminate the Probation.

SECOND: Dr. Farmer

Dr. Gillard spoke against the motion, noting that Dr. Webb has taken remedial action to address the Board's concerns. Dr. Farmer commended Dr. Webb for obtaining additional CME and updating his knowledge in terms of prescribing and recordkeeping; however, he stated that he believes the matter rises to the level of discipline and supported SIRC's recommendation for a disciplinary order.

ROLL CALL VOTE: Roll call vote was taken and the following Board members voted in favor of the motion: Ms. Bain, Ms. Brister, Dr. Farmer, Dr. Figge, Dr. Fromm, Mr. Gerding, Dr. Gillard, Dr. Krahn, Dr. Paul, and Dr. Perry. The following Board members were absent: Dr. Berg and Ms. Salter.

VOTE: 10-yay, 0-nay, 0-abstain, 0-recuse, 2-absent.

MOTION PASSED.

CONSENT AGENDA

T. CASES RECOMMENDED FOR DISMISSAL

MOTION: Ms. Bain moved to dismiss items 1-10 and 12.

SECOND: Dr. Gillard

VOTE: 10-yay, 0-nay, 0-abstain, 0-recuse, 2-absent.

MOTION PASSED.

1. MD-14-0957A, SOYOUNG PARK, M.D., LIC. #R73284
RESOLUTION: Dismiss.
2. MD-14-1425A, STEFANIE J. SCHLUENDER, M.D., LIC. #35958
RESOLUTION: Dismiss.
3. MD-14-1102A, CHRISTINE D. GRAHAM, M.D., LIC. #41222
RESOLUTION: Dismiss.
4. MD-14-1102B, MICHAEL F. KARADSHEH, M.D., LIC. #33290
RESOLUTION: Dismiss.
5. MD-14-1098A, PALLAVI D. PUROHIT, M.D., LIC. #34675
RESOLUTION: Dismiss.
6. MD-13-1157A, JOEL R. GOODE, M.D., LIC. #28515
RESOLUTION: Dismiss.
7. MD-14-0808A, RAFATH U. BAIG, M.D., LIC. #42500
RESOLUTION: Dismiss.
8. MD-14-0295A, JONATHAN R. WALKER, M.D., LIC. #31479
Dr. Walker addressed the Board during the call to the public.

RESOLUTION: Dismiss.
9. MD-14-0295B, ALEXANDER W. JULE, M.D., LIC. #R74179
Dr. Walker addressed the Board during the call to the public on behalf of Dr. Jule. Dr. Jule also addressed the Board during the call to the public.

RESOLUTION: Dismiss.
10. MD-13-1347A, ATUL P. LALANI, M.D., LIC. #33131
RESOLUTION: Dismiss.

3. MD-13-1215A, EDGARDO R. LAUREL, M.D., LIC. #21887

RESOLUTION: Accept the proposed Consent Agreement for a Decree of Censure and Five Year Probation to participate in PHP. Dr. Laurel's PHP participation shall be retroactive to January 8, 2014.

4. MD-13-0355A, AIMEE L. BUTEL, M.D., LIC. #35660

RESOLUTION: Accept the proposed Consent Agreement for License Suspension. Dr. Butel's July 22, 2013 Interim Consent Agreement is vacated as of the effective date of this Consent Agreement. Dr. Butel's license is suspended indefinitely. The physician may request release from suspension from the Board in writing. Reinstatement shall not be granted until after Dr. Butel completes a clinical competency assessment at a facility approved by the Board or its staff, and provide the Board with the assessment report for consideration. During the term of suspension, Dr. Butel shall continue her participation in PHP for a minimum period of two years, retroactive to July 22, 2013, and shall continue her psychiatric treatment until completion of twelve months of continuous treatment.

5. MD-13-1134A, PETER TSAI, M.D., LIC. #45470

RESOLUTION: Accept the proposed Consent Agreement for Surrender of licensure. This Order vacates Dr. Tsai's April 18, 2014 Interim Practice Restriction.

6. MD-13-1266A, ROBERT J. MONDSCHNEIN, M.D., LIC. #32344

RESOLUTION: Accept the proposed Consent Agreement for a Letter of Reprimand and Five Year Probation to participate in PHP. Dr. Mondschein's PHP participation shall be retroactive to March 4, 2014. Dr. Mondschein shall obtain a treating psychiatrist, psychotherapist, and hormone replacement physician approved by the PHP.

7. MD-14-0079B, DENNIS L. ARMSTRONG, M.D., LIC. #9947

The Board considered placing the physician on Probation to complete CME, in addition to the issuance of a Decree of Censure. AAG Smith stated that in order to do so, the Board would need to reject the proposed Consent Agreement and offer the physician a new agreement with the modified discipline. Board members spoke in favor of accepting the proposed Consent Agreement.

MOTION: Ms. Bain moved to accept the proposed Consent Agreement for a Decree of Censure.

SECOND: Dr. Krishna

ROLL CALL VOTE: Roll call vote was taken and the following Board members voted in favor of the motion: Ms. Bain, Dr. Berg, Ms. Brister, Dr. Farmer, Dr. Fromm Mr. Gerding, Dr. Gillard, Dr. Khera, Dr. Krishna, Dr. Paul, Dr. Perry, and Ms. Salter.

VOTE: 12-yay, 0-nay, 0-abstain, 0-recuse, 0-absent.

MOTION PASSED.

8. MD-14-0071A, PAUL A. GUZMAN, M.D., LIC. #33313

RESOLUTION: Accept the proposed Consent Agreement for Surrender of licensure.

V. REVIEW DISCUSSION AND POSSIBLE ACTION REGARDING APPEALS OF EXECUTIVE DIRECTOR DISMISSALS

MOTION: Dr. Khera moved to uphold the dismissal in item numbers 1, 3, 4, and 5.

SECOND: Dr. Gillard

VOTE: 11-yay, 0-nay, 0-abstain, 0-recuse, 1-absent.

MOTION PASSED.

1. MD-13-1460A, PATTI A. FLINT, M.D., LIC. #23855

Dr. Perry stated that he knows Dr. Flint, but that it would not affect his ability to adjudicate the case. Complainant AA and SR spoke during the call to the public. Dr. Flint also addressed the Board during the call to the public with Attorney Mary Pryor.

RESOLUTION: Uphold the dismissal.

2. MD-13-1347A, ATUL P. LALANI, M.D., LIC. #33131

This matter was removed from the Board's meeting agenda.

RESOLUTION: No Board action was taken on this agenda item.

3. MD-14-0474A, ROBYN E. STIEFELD, M.D., LIC. #30583

RESOLUTION: Uphold the dismissal.

4. MD-14-0751A, RANDALL R. HARDISON, M.D., LIC. #24564

RESOLUTION: Uphold the dismissal.

5. MD-13-0873A, GREGG R. GLADHART, M.D., LIC. #35048

RESOLUTION: Uphold the dismissal.

W. LICENSE APPLICATIONS

I. APPROVE OR DENY LICENSE APPLICATION

MOTION: Dr. Khera moved to approve the license application in item numbers 1, 2, 3, and 4.

SECOND: Dr. Gillard

VOTE: 11-yay, 0-nay, 0-abstain, 0-recuse, 1-absent.

MOTION PASSED.

1. MD-14-0683A, GARY R. KANTOR, M.D., LIC. #N/A

RESOLUTION: Approve the license application.

2. MD-14-1529A, JOANNE H. CARDINAL, M.D., LIC. #N/A

RESOLUTION: Approve the license application.

3. MD-14-1536A, IRA W. FREILICH, M.D., LIC. #N/A

RESOLUTION: Approve the license application.

4. MD-14-1573A, RUSSELL K. LAWSON, M.D., LIC. #N/A

RESOLUTION: Approve the license application.

5. MD-14-1087A, ANTHONY F. DAVIS, M.D., LIC. #N/A

Dr. Davis failed to disclose a previous Letter of Reprimand on his license application. Ms. R. Shepherd informed the Board that Dr. Davis indicated that he was mistakenly under the impression that the discipline was only going to be on his record for 90 days.

MOTION: Dr. Gillard moved to approve the license application.

SECOND: Dr. Khera

VOTE: 10-yay, 1-nay, 0-abstain, 0-recuse, 1-absent.

MOTION PASSED.

6. MD-14-1572A, DAMON ALAVEKIOS, M.D., LIC. #N/A

Dr. Alavekios spoke during the call to the public. Board members noted that Dr. Alavekios failed to disclose his DUI arrest at the age of 18 on his California medical license application and that as a result, he was issued a provisional license by the California Medical Board. The Board further noted that Dr. Alavekios submitted a forged document during his licensing process in California, and attempted to falsify community service hours.

MOTION: Dr. Gillard moved to allow the physician the opportunity to withdraw the license application. If he declines, the license shall be denied.

SECOND: Dr. Khera

VOTE: 11-yay, 0-nay, 0-abstain, 0-recuse, 1-absent.

MOTION PASSED.

ii. REVIEW, DISCUSSION AND POSSIBLE ACTION REGARDING APPLICANT'S REQUEST FOR WAIVER OF PRIMARY SOURCE REQUIREMENT



Arizona Medical Board

9545 E. Doubletree Ranch Road • Scottsdale, AZ 85258-5514
Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704
Website: www.azmd.gov

August 07, 2014

Atul P. Lalani M.D.

Via email: [REDACTED]

**Re: Atul P. Lalani MD
Case # MD-13-1347A**

Dear Dr. Lalani:

You were previously provided notice that a complaint had been filed against your Arizona medical license, regarding your treatment of B [REDACTED] S [REDACTED]. The Board's staff has reviewed the complaint, any response(s) you have filed regarding the complaint, and all relevant investigative findings. After reviewing all relevant information, the Board's staff has determined that the complaint does not establish a violation of the Arizona Medical Practice Act. Therefore, as required by Rule 4-16-507, I have dismissed the complaint and notified the complainant of that dismissal.

By law, the complainant may appeal this dismissal if they file their request within 35 days of the notification and they provide the required information. If the investigation is reinstated or reopened by the Board for any reason, you will be notified.

We appreciate your cooperation and patience during this process. Good luck in your medical practice.

Sincerely,

A handwritten signature in cursive script that reads "C Lloyd Vest II".

C. Lloyd Vest, II
Executive Director



Arizona Medical Board

9545 E. Doubletree Ranch Road • Scottsdale, AZ 85258-5514
Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704
Website: www.azmd.gov

June 12, 2013

Atul P. Lalani M.D.
[REDACTED]

**Re: Atul P. Lalani MD
Case # MD-13-0595A**

Dear Dr. Lalani:

The Arizona Medical Board has thoroughly investigated this case and found no violation of the Medical Practice Act. Therefore, this case has been dismissed.

The complainant may appeal this dismissal within 35 days of the date of this letter. If this should occur, you will be notified by mail.

Thank you for your cooperation through the course of this investigation.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa S. Wynn".

Lisa S. Wynn
Executive Director



Arizona Medical Board

9545 E. Doubletree Ranch Road • Scottsdale, AZ 85258-5514
Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704
Website: www.azmd.gov • E-Mail: questions@azmd.gov

April 10, 2009

Atul P. Lalani, MD
East Valley Endocrinology, Diabetes & Metabolism
9700 N. 91st St., # B-220
Scottsdale, AZ 85258-5054

**RE: Atul P. Lalani, MD
Case # MD-08-0352A**

Dear Dr. Lalani:

The Arizona Medical Board has thoroughly investigated this case and found no violation of the Medical Practice Act. Therefore, this case has been dismissed.

The complainant may appeal this dismissal within 35 days of the date of this letter. If this should occur, you will be notified by mail.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa S. Wynn".

Lisa S. Wynn
Executive Director

LSW/cjp



Arizona Medical Board

9545 E. Doubletree Ranch Road • Scottsdale, AZ 85258-5514
Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704
Website: www.azmd.gov • E-Mail: questions@azmd.gov

December 10, 2008

Atul P. Lalani, MD
East Valley Endocrinology, Diabetes & Metabolism
9700 N. 91st St., # B-220
Scottsdale, AZ 85258-5054

**RE: Atul P. Lalani, MD
Case # MD-08-0310A**

Dear Dr. Lalani:

The Arizona Medical Board has thoroughly investigated this case and found no violation of the Medical Practice Act. Therefore, this case has been dismissed.

The complainant may appeal this dismissal within 35 days of the date of this letter. If this should occur, you will be notified by mail.

Sincerely,

Lisa S. Wynn
Executive Director

LSW/cjp



Arizona Medical Board

9545 E. Doubletree Ranch Road • Scottsdale, AZ 85258-5514
Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704
Website: www.azmd.gov • E-Mail: questions@azmd.gov

January 2, 2008

Atul P. Lalani, MD
9700 N 91st St # B-220
Scottsdale AZ 85258-5054

Re: **A.Z. v Atul P. Lalani**
MD-07-0612A

Dear Dr. Atul P. Lalani:

The Arizona Medical Board has thoroughly investigated this case and found no violation of the Medical Practice Act. Therefore, this case has been dismissed.

The complainant may appeal this dismissal within 35 days of the date of this letter. If this should occur, you will be notified by mail.

Sincerely,

Amanda J. Diehl, M.P.A., C.P.M.
Deputy Executive Director



Arizona Medical Board

1740 W Adams St, Suite 4000 • Phoenix, AZ 85007

Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704

Website: www.azmd.gov

October 28, 2025

Sai Sruthi Raprolu M.D.
9550 N. 94th Place, #207
Scottsdale, AZ 85258

**Re: Sai Sruthi Raprolu MD
Case # MD-25-0535A**

Dear Dr. Raprolu:

You were previously provided notice that a complaint had been filed against your Arizona medical license. The Board's staff has reviewed the complaint referenced above, any response(s) you have filed regarding the complaint, and all relevant investigative findings. After reviewing all relevant information, the Board's staff has determined that the complaint does not establish a violation of the Arizona Medical Practice Act. Therefore, as required by Rule 4-16-507, I have dismissed the complaint and notified the complainant of that dismissal.

By law, the complainant may appeal this dismissal if they file their request within 35 days of the notification and they provide the required information. If the investigation is reinstated or reopened by the Board for any reason, you will be notified.

We appreciate your cooperation and patience during this process. Good luck in your medical practice.

Sincerely,

A handwritten signature in cursive script that reads "Raquel Rivera".

Raquel Rivera, MPH
Executive Director

EXHIBIT D



DAVID J. HOFFA, ESQ.

July 25, 2026

re: Demand for Disclosure of Complaints in Response to Public Records Request from Judicial Watch, Inc.

To the Arizona Medical Board,

My client, Judicial Watch, Inc., submitted to the Arizona Medical Board a public records request under the Arizona Public Records Law (APRL), A.R.S. § 39-121 *et seq.* (see attached, Exhibit A). The Board, through its Public Records Coordinator, sent a letter to Judicial Watch responding to this records request (see attached, Exhibit B). This response indicated that certain responsive records were withheld from disclosure, asserting that “complainants [sic]¹ and documents that are part of the Board’s investigative file . . . are confidential pursuant to A.R.S. § 32-1451.01(C) and (E), and are exempt from disclosure to the public and not obtainable by subpoena.” In support of this conclusion, the response cited *Lipschultz v. Superior Court*, 128 Ariz. 16 (1981), and *Arizona Board of Medical Examiners v. Superior Court*, 186 Ariz. 360 (App. 1996). Relevantly, the Board’s disclosure did not include any complaints against the licensees identified by Judicial Watch’s records request, despite the fact that the existence of multiple complaints is confirmed by the records that the Board did disclose (see attached, Exhibits C and D).

Judicial Watch respectfully disagrees with the Board’s decision to withhold these complaints from disclosure, and requests that the Board disclose all complaints received by the Board concerning the licensees identified in Judicial Watch’s record request.

The APRL grants a broad right to the public to inspect public records upon request, A.R.S. § 39-121; *Carlson v. Pima Cnty.*, 141 Ariz. 487, 489 (1984), subjecting public records to a presumption in favor of disclosure. *Lunney v. State*, 244 Ariz. 170, 179, ¶ 29 (App. 2017). In accord with and reinforcing this principle within the context at hand, A.R.S. § 32-3214(A) expressly designates complaints submitted to the Board that do not result in disciplinary or nondisciplinary orders or actions against a licensee to be public records. Specifically, this statute states:

¹ Judicial Watch’s records request sought “complaints” submitted to the Board concerning the identified licensees, not the identity of “complainants.” See Exhibit A, p. 1.

If a health profession regulatory board dismisses a complaint, the record of that complaint is available to . . . the public pursuant to section 39-121 For the purposes of this subsection, “dismisses a complaint” means that a board does not issue a disciplinary or nondisciplinary order or action against a licensee or certificate holder.

In light of the APRL’s overarching policy that broadly favors disclosure, “the record of that complaint” in this statute must be interpreted to include the complaint as such. Indeed, complaints’ status as disclosable public records is confirmed by A.R.S. § 32-3214(C), which provides that “a person may obtain additional public records . . . including dismissed complaints[.]” Given that the records the Board disclosed evidence the existence of responsive complaints, and because the disclosed records indicate that all of these complaints were “dismissed” within the meaning of A.R.S. § 32-3214(A), *see* Exhibits C and D, these complaints should have been disclosed to Judicial Watch in response to its records request.

The Board’s letter response to Judicial Watch’s records request, read in light of the fact that no complaints were disclosed, appears to assert that such complaints are made confidential by A.R.S. § 32-1451.01(C) and (E). This position cannot be sustained.

A.R.S. § 32-1451.01 provides in relevant part:

(C) Patient records, including clinical records, medical reports, laboratory statements and reports, any file, film, other report or oral statement relating to diagnostic findings or treatment of patients, any information from which a patient or the patient’s family might be identified or any information received and records or reports kept by the board as a result of the investigation procedure outlined in this chapter are not available to the public.

. . .

(E) Hospital records, medical staff records, medical staff review committee records and testimony concerning these records and proceedings related to the creation of these records are not available to the public, shall be kept confidential by the board and are subject to the same provisions concerning discovery and use in legal actions as are the original records in the possession and control of hospitals, their medical staffs and their medical staff review committees. The board shall use such records and testimony during the course of investigations and proceedings pursuant to this chapter.

To start, the Board's interpretation is at odds with A.R.S. § 32-3214(A) and (C), which make complaints disclosable public records, as explained above. Specific statutory provisions control over general ones, *Friedemann v. Kirk*, 197 Ariz. 616, 618, ¶ 9 (App. 2000), and A.R.S. § 32-3214(A) and (C), which expressly discuss "complaints," are more specific than A.R.S. § 32-1451.01(C) and (E), which discuss "information," "records," and "reports."

But even on their own terms, A.R.S. § 32-1451.01(C) and (E) cannot extend to protect complaints from disclosure. In subsection (C), the only language that could extend to complaints is "any information received and records or reports kept by the board as a result of the investigation procedure outlined in this chapter[.]" But this general language follows more specific terms where the statute provides confidentiality for enumerated classes of "patient records." These specified protected categories of information limit what the final general terms in the subsection can be interpreted to protect. *See Estate of Braden v. State*, 228 Ariz. 323, 326, ¶ 13 (2011) ("general words that follow the enumeration of particular classes of . . . things should be interpreted as applicable only to . . . things of the same general nature or class. . . . Similarly, . . . a statutory term is interpreted in context of the accompanying words"). And subsection (E) pertains to records of the type that are created by hospitals, medical staff, and medical staff review committees in their normal course of business, which does not include complaints that are created for submission to the Board.

Lipschultz and Board of Medical Examiners prove the point. In *Lipschultz*, two doctors were sued for malpractice and the Board conducted its own investigation into the claims. 128 Ariz. at 17. The claimants issued a subpoena duces tecum to the Board seeking letters sent to the Board from the doctors, autopsy reports, and medical records that the Board had received in the course of its investigation. *Id.* The Supreme Court held that the letters were privileged under A.R.S. § 32-1451.01(C) because they were created and received by the Board as a result of its investigation, and remanded for the trial court to determine whether the remaining records (which were created before the Board began its investigation) were discoverable under A.R.S. § 32-1451.01(E). *Id.* at 18–19. Crucially, none of the documents at issue were complaints submitted to the Board.

In *Board of Medical Examiners*, the Board objected to a subpoena duces tecum served upon it by a doctor's spouse during an action for dissolution of marriage searching for records related to a psychologist's evaluation of the doctor during a previous unconnected Board investigation of the doctor. 186 Ariz. at 361. The court held that the evaluation records were protected against disclosure by A.R.S. § 32-1451.01(C) as "medical records" that were created and received by the Board as a result of the Board's investigation into the doctor. *Id.* at 361–62. Again, the records at issue were not complaints submitted to the Board about a licensee, but were rather records containing an individual's medical (psychological) information that were created and received because the Board was conducting an investigation. This is categorically distinct from a complaint that was created and submitted to the Board before the initiation of any Board investigation.

Lastly, even if A.R.S. § 32-1451.01(C) and (E) standing alone could possibly be interpreted to shield complaints from disclosure, this interpretation is foreclosed by the principle that privileges must be “narrowly construe[d]” “because they are in derogation of the search for truth.” *Fann v. Kemp*, 253 Ariz. 537, 542, ¶ 9 (2022) (quotation omitted). Between competing interpretations, the interpretation that leaves a greater amount of information open to public inspection is to be preferred. And the confidential materials contemplated by A.R.S. § 32-1451.01(C) only include information received and records kept by the Board “as a result of” an investigation. But a complaint is a record that may catalyze an investigation; it is not a record that is a “result of” an investigation. *See Lipschultz*, 128 Ariz. at 18–19 (letters created because of a Board investigation were privileged, but medical records created before initiation of a Board investigation may be discoverable).

For the foregoing reasons, the Board lacked legal justification to withhold the complaints that Judicial Watch’s records request sought. To the extent information contemplated by A.R.S. § 32-1451.01(C) and (E) is contained within these complaints, this information can be redacted within the disclosed copies of these complaints, rather than withholding the complaints entirely. *See Judicial Watch, Inc. v. City of Phoenix*, 228 Ariz. 393, 396, ¶ 12 (App. 2011) (“confidentiality interests do not preclude inspection of [records] entirely if the information affecting these interests can be redacted”). The Board ran afoul of this principle by withholding the complaints Judicial Watch sought, rather than producing versions that were appropriately redacted in order to protect confidential information (if such redactions were necessary).

Judicial Watch demands that the Board disclose all complaints against the licensees identified in the records request within 10 business days unless the Board can provide sufficient lawful justification(s), supported by evidence, for nondisclosure. *See Fisher v. Maricopa Cnty. Stadium Dist.*, 185 Ariz. 116, 121–22 (App. 1995) (government must support nondisclosure with specific justifications). If the Board determines that any of these complaints are required by law to be withheld, then Judicial Watch demands that the Board provide a withholdings index pursuant to A.R.S. § 39-121.01(D)(2)² that identifies the withheld complaints and provides “specific assertions explaining why the document is purportedly privileged to the greatest extent possible[.]” *Fann*, 253 Ariz. at 548, ¶ 34. If such disclosure and/or index are not received, Judicial Watch intends to commence a special action in the Maricopa County Superior Court to compel the Board’s compliance with the APRL.

Thank you for your attention. I look forward to receiving your response and working with you to resolve this matter.

² A.R.S. § 39-121.01(D)(2) applies to any “agency” as that word is used in A.R.S. § 41-1001, which includes “any board . . . of this state[.]” Plainly, this provision applies to the Arizona Medical Board.

Respectfully,

David J. Hoffa, #038052
Attorney for Judicial Watch, Inc.
c/o Mark Spencer
P.O. Box 30042
Phoenix, AZ 85046
(989) 627-7757
davjhoffa@gmail.com

EXHIBIT E



OFFICE OF THE ARIZONA ATTORNEY GENERAL

KRIS MAYES
ATTORNEY GENERAL

STATE GOVERNMENT DIVISION
ANN SCHEEL, DIVISION CHIEF COUNSEL
LICENSING & ENFORCEMENT SECTION

CARRIE SMITH, AAG
DIRECT PHONE NO. 602-542-7033
CARRIE.SMITH@AZAG.GOV

August 14, 2026

SENT VIA EMAIL (davjhoffa@gmail.com) ONLY
David Hoffa, Esq.

RE: Public Records Request by Judicial Watch, Inc.

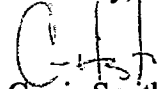
Dear Mr. Hoffa,

I am the Legal Advisor for the Arizona Medical Board and I'm writing in response to your July 25, 2026 demand for disclosure of complaints that may have been filed against Dr. Sai Raprolu and Dr. Atul Lalani. The Board's statute with regard to this issue is clear, unambiguous and provides broad protection for the Board's investigation file documents. A.R.S. § 32-1451(A) discusses the Board's authority to receive complaints from the public, physicians and other entities to initiate the Board's investigations. These complaints constitute "information received and records or reports kept by the board as a result of" the Board's investigation process and are "not available to the public." A.R.S. § 32-1451.01(C). The Board's obligations under this statute do not expire and this type of confidentiality protection is common to all health professional regulatory board practice acts. *See e.g.* A.R.S. §§ 32-1263.02(N), 32-1551.01(C), 32-1664(N). Chapter 32 of Title 32 includes statutes that apply generally to health professional licensing boards. *See* A.R.S. § 32-3201. Where these statutes are intended to supersede (rather than supplement) specific agency practice acts, the language indicates that intent. *See e.g.* A.R.S. § 32-3224(A).

One of the most basic tenants of statutory interpretation is to give every word in the statute meaning so that no word or provision is rendered superfluous. *State v. Stubblefield*, 261 Ariz. 583 P.3d 1257, 1260-1261 (2025). This includes consideration of the language in relation to the entire text, considering context and related statutes on the same subject. *Id.* at 1261. Whenever reasonably practicable, statutes should be interpreted so they are harmonious and consistent with each other. *Green v. Lisa Frank, Inc.* 221 Ariz. 138, 148, 211 P.3d 16, 26 (App. 2009). Your proposed interpretation ignores these basic rules by failing to give meaning to all words in § 32-3214(A), as well as ignoring both the context and related statutes.

Consistent with its obligations under A.R.S. §§ 32-1451.01(C) 32-3214(A), and 39-121.01, the Board provided Judicial Watch with a “record of the complaints” by producing the resolution documents for complaints filed against these physicians. No additional records will be provided. Per your request, a privilege log is attached.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Smith'.

Carrie Smith

Assistant Attorney General

cc: Raquel Rivera, Executive Director
Michelle Robles, Board Operations Manager

PRIVILEGE LOG

Case #	Document	LEGAL BASIS
(Dr. Atul Lalani)		
MD-08-0310A	Complaint 1 Complaint 2 Complaint 3	A.R.S. § 32-1451.01(C)
MD-08-0352A	Complaint 1 Complaint 2	A.R.S. § 32-1451.01(C)
MD-13-0595A	Complaint	A.R.S. § 32-1451.01(C)
MD-13-1347A	Complaint	A.R.S. § 32-1451.01(C)
MD-14-0901A	Complaint	A.R.S. § 32-1451.01(C)
MD-15-0070A	Complaint 1 Complaint 2	A.R.S. § 32-1451.01(C)
MD-16-1555A	Complaint	A.R.S. § 32-1451.01(C)
MD-17-0951A	Complaint	A.R.S. § 32-1451.01(C)
MD-19-0031A	Complaint	A.R.S. § 32-1451.01(C)
MD-21-1128A	Complaint	A.R.S. § 32-1451.01(C)
MD-24-0088A	Complaint	A.R.S. § 32-1451.01(C)
MD-24-1211A	Complaint	A.R.S. § 32-1451.01(C)
MD- 26-0064A	Complaint	A.R.S. § 32-1451.01(C)
(Dr. Sai Raprolu)		
MD-25-0535A	Complaint	A.R.S. § 32-1451.01(C)