

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

In the Matter of the Accusation Against:)

HAROLD H. BLOOMFIELD, M.D.)

File No. 10-2001-128724

Physician's and Surgeon's)
Certificate No. G18886)

Respondent.)
_____)

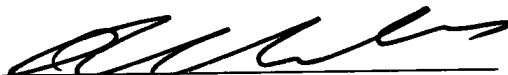
DECISION

The attached Stipulated Surrender of License and Order is hereby adopted as the Decision and Order of the Division of Medical Quality of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on May 28, 2002.

IT IS SO ORDERED May 20, 2002.

MEDICAL BOARD OF CALIFORNIA

By: 
Hazem H. Chehabi, M.D., Chair
Panel A
Division of Medical Quality

1 BILL LOCKYER, Attorney General
 of the State of California
 2 STEVEN H. ZEIGEN, State Bar No. 60225
 Deputy Attorney General
 3 California Department of Justice
 110 West "A" Street, Suite 1100
 4 San Diego, CA 92101
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 7
 8 Attorneys for Complainant

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

11 In the Matter of the Accusation Against:
 12
 13 HAROLD H. BLOOMFIELD, M.D.
 1110 Luneta Drive
 14 Del Mar, California 92014
 15 Physician's and Surgeon's
 Certificate No. G18886

Case No. 10-2001-128724

OAH No.

**STIPULATED SURRENDER OF
 LICENSE AND ORDER**

16 Respondent.
 17

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
 19 proceeding that the following matters are true:

20 PARTIES

21 1. Ron Joseph (Complainant) is the Executive Director of the Medical Board
 22 of California. He brought this action solely in his official capacity and is represented in this
 23 matter by Bill Lockyer, Attorney General of the State of California, by Steven H. Zeigen, Deputy
 24 Attorney General.

25 2. Harold H. Bloomfield, M.D. (Respondent) is represented in this
 26 proceeding by attorney Cary W. Miller, whose address is 660 W. Broadway, San Diego,
 27 California 92101.

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1 subpoenas to compel the attendance of witnesses and the production of documents; the right to
2 reconsideration and court review of an adverse decision; and all other rights accorded by the
3 California Administrative Procedure Act and other applicable laws.

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

6 CULPABILITY

7 8. Respondent understands that the charges and allegations in the
8 Accusation, if proven at a hearing, constitute cause for imposing discipline upon his Physician's
9 and Surgeon's certificate. For purposes of resolving the outstanding Accusation respondent
10 admits that on January 23, 2002, he plead guilty to two felony counts of furnishing a controlled
11 substance, Ecstasy, in violation of Health and Safety Code Section 11154. He further admits that
12 on March 22, 2002, he was sentenced by the trial court to five years probation, on conditions
13 which included his not practicing medicine for five years.

14 9. Respondent understands that by signing this stipulation he enables the
15 Division to issue its order accepting the surrender of his Physician's and Surgeon's Certificate
16 without further process.

17 10. Upon acceptance of the stipulation by the Division, Respondent
18 understands that he will no longer be permitted to practice as a physician and surgeon in
19 California, and also agrees to surrender and cause to be delivered to the Division both his
20 Physician's and Surgeon's certificate and wallet certificate before the effective date of the
21 decision.

22 CONTINGENCY

23 11. This stipulation shall be subject to approval by the Division of Medical
24 Quality. Respondent understands and agrees that counsel for Complainant and staff of the
25 Medical Board of California may communicate directly with the Division regarding this
26 stipulation and settlement, without notice to or participation by Respondent or his counsel. By
27 signing the stipulation, Respondent understands and agrees that he may not withdraw his
28 agreement or seek to rescind the stipulation prior to the time the Division considers and acts

1 upon it. If the Division fails to adopt this stipulation as its Decision and Order, the Stipulated
2 Surrender of License and Order shall be of no force or effect, except for this paragraph, it shall be
3 inadmissible in any legal action between the parties, and the Division shall not be disqualified
4 from further action by having considered this matter.

5 12. The parties understand and agree that facsimile or other copies of this
6 Stipulated Surrender of License and Order, including the signatures thereto, shall have the same
7 force and effect as the originals.

8 13. In consideration of the foregoing admissions and stipulations, the parties
9 agree that the Division may, without further notice or formal proceeding, issue and enter the
10 following Order:

11 **ORDER**

12 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No.
13 G18886, issued to Respondent Harold H. Bloomfield is surrendered and accepted by the Division
14 of Medical Quality.

15 14. The surrender of Respondent's Physician's and Surgeon's Certificate No.
16 G18886 and the acceptance of the surrendered license by the Division shall constitute the
17 imposition of discipline against Respondent. This stipulation constitutes a record of the
18 discipline and shall become a part of Respondent's license history with the Division.

19 15. Respondent shall lose all rights and privileges as a Physician and Surgeon
20 in California as of the effective date of the Division's Decision and Order.

21 16. Respondent shall cause to be delivered to the Division both his
22 Physician's and Surgeon's Certificate and wallet certificate on or before the effective date of the
23 Decision and Order.

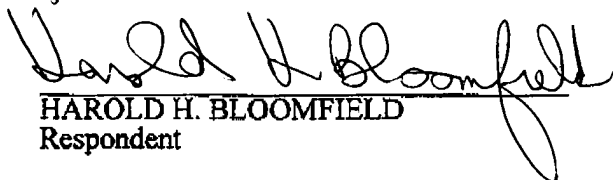
24 17. Respondent fully understands and agrees that if he ever files an application
25 for licensure or a petition for reinstatement in the State of California, the Division shall treat it as
26 a petition for reinstatement. Respondent must comply with all the laws, regulations and
27 procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all
28 of the charges and allegations contained in Accusation, No. 10-2001-128724 shall be deemed to

1 be true, correct, and admitted by Respondent when the licensing agency determines whether to
2 grant or deny the petition.

3 ACCEPTANCE

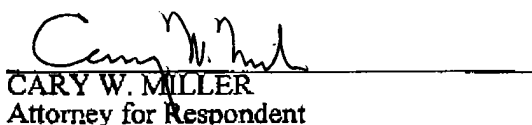
4 I have carefully read the above Stipulated Surrender of License and Order and
5 have fully discussed it with my attorney, Cary W. Miller. I understand the stipulation and the
6 effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated
7 Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound
8 by the Decision and Order of the Division of Medical Quality, Medical Board of California.

9 DATED: APRIL 17, 2002.

10 
11 HAROLD H. BLOOMFIELD
12 Respondent

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14 I have read and fully discussed with Respondent Harold H. Bloomfield the terms
15 and conditions and other matters contained in this Stipulated Surrender of License and Order. I
16 approve its form and content.

17 DATED: 4/24/02.

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20 CARY W. MILLER
21 Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Division of Medical Quality, Medical Board of California of the Department of Consumer Affairs.

DATED: 4/26/02

BILL LOCKYER, Attorney General
of the State of California



STEVEN H. ZEIGEN
Deputy Attorney General

Attorneys for Complainant

DOJ Docket Number: 03573160-SD02 0221
Stipulation for surrender 10/12/01

EXHIBIT "A"

1 BILL LOCKYER, Attorney General
of the State of California
2 STEVEN H. ZEIGEN, State Bar No. 60225
Deputy Attorney General
3 California Department of Justice
110 West "A" Street, Suite 1100
4 San Diego, CA 92101
5 P.O. Box 85266
San Diego, CA 92186-5266
6 Telephone: (619) 645-2074
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10 **BEFORE THE**
DIVISION OF MEDICAL QUALITY
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 10-2001-128724

13 HAROLD H. BLOOMFIELD, M.D.
14 1110 Luneta Drive
Del Mar, California 92014

A C C U S A T I O N

15 Physician's and Surgeon's
16 Certificate No. G18886

Respondent.

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19 Complainant alleges:

20 PARTIES

21 1. Ron Joseph (Complainant) brings this Accusation solely in his official
22 capacity as the Executive Director of the Medical Board of California, Department of Consumer
23 Affairs.

24 2. On or about August 3, 1970, the Medical Board of California issued
25 Physician's and Surgeon's Certificate No. G 18886 to Harold H. Bloomfield, M.D. (Respondent).
26 The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the
27 charges brought herein and will expire on October 31, 2002, unless renewed.

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"(c) The clerk of the court in which a licensee is convicted of a crime shall, within 48 hours after the conviction, transmit a certified copy of the record of conviction to the board. The division may inquire into the circumstances surrounding the commission of a crime in order to fix the degree of discipline or to determine if the conviction is of an offense substantially related to the qualifications, functions, or duties of a physician and surgeon.

"(d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is deemed to be a conviction within the meaning of this section and Section 2236.1. The record of conviction shall be conclusive evidence of the fact that the conviction occurred."

7. Section 2237 of the Code states:

"(a) The conviction of a charge violating any federal statutes or regulations or any statute or regulation of this state, regulating dangerous drugs, or controlled substances, constitutes unprofessional conduct. The record of the conviction is conclusive evidence of such unprofessional conduct."

8. Section 2238 states that a violation of any federal statute or federal regulation or any of the statutes or regulations of this state regulating dangerous drugs or controlled substances constitutes unprofessional conduct.

9. Section 2239 of the Code states:

"(a) The use or prescribing for or administering to himself or herself, of any controlled substance; or the use of any of the dangerous drugs specified in Section 4022, or of alcoholic beverages, to the extent, or in such a manner as to be dangerous or injurious to the licensee, or to any other person or to the public, or to the extent that such use impairs the ability of the licensee to practice medicine safely or more than one misdemeanor or any felony involving the use, consumption, or self-administration of any of the substances referred to in this section, or any combination thereof, constitutes unprofessional conduct. The record of the conviction is conclusive evidence of such unprofessional conduct.

"(b) A plea or verdict of guilty or a conviction following a plea of nolo contendere is deemed to be a conviction within the meaning of this section. The Division of Medical Quality may order discipline of the licensee in accordance with Section 2227 or the Division of Licensing may order the denial of the license when the time for appeal has elapsed or the judgment of conviction has been affirmed on appeal or when an order granting probation is made suspending imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code allowing such person to withdraw his or her plea of guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or dismissing the accusation, complaint, information, or indictment."

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10. Section 726 of the Code states:

"The commission of any act of sexual abuse, misconduct, or relations with a patient, client, or customer constitutes unprofessional conduct and grounds for disciplinary action for any person licensed under this division, under any initiative act referred to in this division and under Chapter 17 (commencing with Section 9000) of Division 3.

"This section shall not apply to sexual contact between a physician and surgeon and his or her spouse or person in an equivalent domestic relationship when that physician and surgeon provides medical treatment, other than psychotherapeutic treatment, to his or her spouse or person in an equivalent domestic relationship."

11. Section 14124.12 of the Welfare and Institutions Code states, in pertinent part:

"(a) Upon receipt of written notice from the Medical Board of California, the Osteopathic Medical Board of California, or the Board of Dental Examiners of California, that a licensee's license has been placed on probation as a result of a disciplinary action, the department may not reimburse any Medi-Cal claim for the type of surgical service or invasive procedure that gave rise to the probation, including any dental surgery or invasive procedure, that was performed by the licensee on or after the effective date of probation and until the termination of all probationary terms and conditions or until the probationary period has ended, whichever occurs first. This section shall apply except in any case in which the relevant licensing board determines that compelling circumstances warrant the continued reimbursement during the probationary period of any Medi-Cal claim, including any claim for dental services, as so described. In such a case, the department shall continue to reimburse the licensee for all procedures, except for those invasive or surgical procedures for which the licensee was placed on probation."

12. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

FIRST CAUSE FOR DISCIPLINE

(Conviction of a Crime)

13. Respondent Harold Bloomfield, M.D. is subject to disciplinary action under section 2236 of the Code in that he was convicted of a crime substantially related to the qualifications, functions, or duties of a physician and surgeon. The circumstances are as follows:

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1 a. On or about January 23, 2002, the District Attorney of San
2 Diego, in an amended six count complaint charged respondent with five felonies
3 and one misdemeanor. Respondent was charged with two counts of giving
4 another a drink poisoned with medicine in violation of Penal Code section 347(a).
5 He was also charged with two counts of furnishing a controlled substance,
6 Ecstasy, in the absence of any pathology in violation of Health and Safety Code
7 section 11154(a). Respondent was charged with one count of furnishing
8 controlled substances in violation of Health and Safety Code section 11379(a).
9 Respondent was charged with one count of misdemeanor sexual battery in
10 violation of Penal Code Section 243.4(d)(1).

11 b. On or about January 23, 2002, respondent plead guilty to
12 two counts of furnishing Ecstasy to another in violation of Health and Safety
13 Code section 11154(a).

14 SECOND CAUSE FOR DISCIPLINE

15 (Unprofessional Conduct-Gross Negligence, Repeated Acts of Negligence, Dishonest Acts)

16 14. Respondent is subject to disciplinary action under section 2234 of the
17 Code in that respondent committed acts of general unprofessional conduct, gross negligence,
18 repeated acts of negligence, and dishonesty during his treatment and contact with patients N.B.,
19 A.I., E.E., and M.C. The circumstances are as follows:

20 **Re: N.B.**

21 a. On or about July 26, 2001, N.B. went to respondent's home
22 for a professional consultation regarding issues related to her pending divorce
23 from her husband.

24 b. Inside the residence, respondent suggested the counseling
25 take place on a balcony located off the master bedroom. When N.B. got to that
26 location, she saw two drinks were already there, one of which contained a yellow
27 liquid. Respondent told her the yellow drink was for her. N.B drank it and

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1 noticed the drink was distasteful. When she asked respondent what was in the
2 drink he told her lemonade.

3 c. Within a short period of time N.B. began to feel strange,
4 and suspected she had been drugged by respondent. She felt a burning sensation in
5 her chest and became increasingly uncomfortable. She told respondent she was
6 feeling pain in the stitches from her recent breast augmentation surgery.
7 Respondent suggested N.B. take off her blouse and bra so that he could examine
8 her breasts. N.B. agreed and respondent performed the examination.

9 d. During that time respondent's phone rang and respondent
10 went downstairs to answer it. N.B. took that opportunity to leave respondent's
11 residence, taking the glass of yellow liquid with her. She felt so drugged she tried
12 to jump out of a moving vehicle.

13 e. Later that same day, N.B. was taken to U.C.S.D. Medical
14 Center where her urine tested positive for amphetamines, barbiturates, and
15 opiates.

16 f. The glass containing the yellow liquid was sent to the San
17 Diego Sheriff's crime laboratory for analysis. In the bottom of the glass was a
18 white residue found to contain 3.34 grams of methamphetamine and
19 methylenedioxymethamphetamine (Ecstasy).

20 **Re: A.I.**

21 g. On or about November 29, 2001, A.I. met respondent at his
22 residence after being told by friends what a wonderful marriage therapist
23 respondent was.

24 h. During this meeting A.I. told respondent she was studying
25 yoga and massage therapy. Respondent seemed interested and asked A.I if she
26 would give him a yoga therapy session. A.I. agreed.

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1 i. A.I. changed into a pair of sweat pants and went upstairs
2 with respondent. Respondent changed into a white night shirt, and began telling
3 A.I about his trip to India where he met a saint who had given him powers.
4 Respondent then offered to give A.I. an "energy transfer treatment," and A.I.
5 agreed.

6 j. Respondent went downstairs for about 10 minutes and
7 returned to the bedroom with a green, smoothie type drink. Respondent told A.I.
8 to close her eyes and drink the drink because it would help keep her body
9 stabilized. A.I. drank the liquid and saw, at the bottom, that the liquid turned dark
10 brown and tasted quite bitter.

11 k. Respondent then instructed A.I. to lay down on the bed and
12 told her she could have the modest version of the treatment with her clothes on, or
13 the "tantric" version of the treatment in the nude with respondent touching her
14 private parts. A.I. chose the modest version.

15 l. During the "treatment" respondent touched various parts of
16 A.I.'s body, calling them "chakra points." A.I. began to feel physically strange.
17 Her body was heavy and her mouth was very dry. She could not sit-up, and she
18 began to wonder if respondent had put something in her drink.

19 m. Respondent removed A.I.'s sweat pants and put his hands
20 on her pubic area. He asked her if this was okay, and A.I. nodded "yes." A short
21 time later, A.I. was able to resist and put her sweat pants back on.

22 n. Respondent then lay on the bed for some time with A.I.
23 When respondent put his hand underneath her shirt and bra and touched her
24 nipple, she told respondent she did not want that and pulled his hand away.

25 o. A.I. was able to leave respondent's residence about 12:30
26 a.m. Respondent was still in the bedroom, but was quiet and not responsive. A.I.
27 noticed she was clenching her fists and grinding her teeth, symptoms of Ecstasy
28 ingestion.

1 p. A.I. went to Scripps Hospital for a urinalysis and blood
2 analysis. Despite a negative finding, respondent admitted for purposes of his
3 guilty plea, that the drink given to A.I. contained Ecstasy. In later messages left
4 on A.I.'s answering machine, respondent apologized for his behavior and
5 admitted the drink he gave her contained added Cava and Arguana.

6 **Re: E.E.**

7 q. On or about September 6, 2001, E.E. was in respondent's
8 office on a clinical visit for marital problems. During their session respondent
9 spoke to E.E. about his own family and problems.

10 r. At the end of their session respondent prescribed E.E.
11 Wellbutrin. She asked respondent if it was okay to take since she was breast
12 feeding her baby. Respondent said there was no problem. At the pharmacy where
13 E.E. went to have the prescription filled the pharmacist recommended against
14 taking the drug because she was breast feeding.

15 s. E.E. had a second appointment with respondent that day,
16 in which her brother also attended. She made another appointment for September
17 7, 2001. After greeting her, respondent gave her a drink, after which she felt very
18 drugged. Respondent told her it was a spirulina fruit drink. Respondent told E.E.
19 to lie down and relax for a few moments, while he fixed her "chocra". E.E. began
20 feeling a burning sensation in her throat down to her stomach.

21 t. After a few moments respondent told E.E. to open her eyes.
22 When she did, respondent asked her "have you ever had a cock in your mouth that
23 you didn't want to have in there?" E.E. began to physically shiver and her palms
24 started to sweat.

25 u. E.E. asked respondent what he had put in the drink.
26 Respondent told her the juice was past its expiration date. E.E. became frightened
27 and ran out of respondent's office, called her husband on the phone, and
28 ultimately drove to Scripps Encinitas Hospital. She submitted to a urine test, but

1 became frustrated with the hospital staff, grabbed her urine bottle and left the
2 premises.

3 v. After leaving the hospital E.E. received a cell phone call
4 from a woman identifying herself as respondent's former wife. "Sirah." E.E. was
5 asked to meet Sirah at a local Del Mar coffee shop and hesitatingly agreed. Once
6 at the coffee shop, Sirah told E.E. respondent had drugged another patient about a
7 month before. With Sirah's help, E.E. went back to Scripps Encinitas Hospital
8 and finished her tests.

9 w. Later that same day, E.E. was also tested at St. Joseph's
10 Hospital in Orange after breast feeding her daughter and becoming afraid that her
11 child might be harmed. The test was positive for methamphetamine. E.E. was
12 advised not to breast feed her child for 24-48 hours.

13 **Re: M.C.**

14 x. M.C. was respondent's patient from December 2000
15 through April 2001, having sought treatment for the effects of childhood incest
16 and severe emotional abuse.

17 y. Respondent initially prescribed a medication for her to take
18 while she was on a cruise. M.C. was hesitant to take the medication because of
19 the drug addiction of her mother, but did. She reported back to respondent that
20 the drug made her feel strange and she became very promiscuous on the cruise.
21 After her return from the cruise, M.C. became suicidal. She reported this to
22 respondent who told her to discontinue the medication.

23 z. Sometime in April 2001 respondent called M.C. at her
24 home and told her he and his wife of 20 or 25 years of marriage were separating.
25 He asked if she would like to come to his home and have sex with him, adding
26 that it would be an incredible experience. M.C. thought respondent was kidding
27 and asked to schedule another appointment with him. Respondent told her "you
28

1 can come today and I won't charge you, or you can come on Tuesday and pay me
2 \$300 to keep my dick in my pants."

3 aa. During his treatment of M.C. respondent gave her two
4 medications. One was orange pills in a manufacturer's bottle marked Depokote¹.
5 The prescription had been removed and there were no instructions on the bottle.
6 It was not labeled for M.C. Respondent did not write M.C. a prescription for this
7 drug, but instead handed her the bottle and told her to take it on her cruise. The
8 second drug was in a sealed bottle labeled "Blissful Joy" by the manufacturer.
9 The label stated it was a synergy of herbs designed to lift one's emotions.

10 15. On December 19, 2001, a search warrant was executed at respondent's
11 residence. 134 Lorcet tablets were found in a bottle labeled Nature's Plus Bromel Supplement
12 1500. 195 Ritalin tablets were found in a bottle labeled Allergy Research Group Yeast Dietary
13 Supplement. An additional 189 Lorcet tablets were found in a bottle labeled Yacon Yohimbine
14 5.4 mg, 100 tablets, Palisade Pharmacy, Tenafly, N.J. Fourteen Hydrocodone bitartrate tablets
15 were found in a prescription vial prescribed by respondent for his estranged wife Sirah Vettese.
16 Seventeen Klonopin tablets were found in a prescription vial prescribed by psychiatrist, Dr. R.B.,
17 for respondent.

18 16. Respondent is guilty of having violated code section 2234 (b), (c), (d), and
19 (e) in that he committed acts of unprofessional conduct, gross negligence, repeated negligent
20 acts, incompetence, and dishonesty during his contacts with N.B., A.I., E.E., and M.C. as
21 follows:

22 a. Paragraph 14 (a) through (aa) is incorporated by reference
23 as if fully set forth herein.

24 b. Respondent put an illegal drug into N.B.'s drink without
25 her knowledge and without her consent.

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1. Depokote is a prescription drug made by Abbott Laboratories containing sodium valproate and valporic acid used in the treatment of epilepsy and other seizure disorders.

1 c. Respondent lied to N.B about what was in the drink when
2 she asked him about it.

3 d. Respondent touched N.B.'s breasts under the guise of
4 performing a breast examination after having already given the unsuspecting
5 woman the drugged drink.

6 e. Respondent put an illegal drug into A.I.'s drink without her
7 knowledge and without her consent.

8 f. Respondent lied to A.I. when he told her the drugged drink
9 would help keep her body stabilized.

10 g. Respondent touched A.I.'s breasts and pubic area under the
11 guise of performing an "energy transfer treatment" after having already given the
12 unsuspecting woman the drugged drink.

13 h. Respondent spoke with E.E. about his own family problems.

14 i. Respondent prescribed Wellbutrin to E.E. despite knowing
15 she was breast feeding her baby.

16 j. Respondent put an illegal drug into E.E.'s drink without her
17 knowledge and without her consent.

18 k. Respondent lied to E.E. when he told her the drink was not
19 drugged, but was only juice past its expiration date.

20 l. Respondent asked E.E. whether she had ever had a penis in
21 her mouth she did not want there.

22 m. Respondent gave M.C. a drug to take on her cruise which
23 made her feel promiscuous.

24 n. Respondent talked with M.C. about his personal life, and
25 then asked her if she would like to have sex with him.

26 o. Respondent gave M.C. the drug Depokote, which was
27 contraindicated for M.C., and never wrote a prescription for it.

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1 17. Respondent is guilty of gross negligence and dishonesty as a result of his
2 maintaining schedule II (Ritalin) and schedule III (Lorcet) in improperly labeled containers and
3 in an unsecured manner.

4 THIRD CAUSE FOR DISCIPLINE

5 (Unlawful Use or Prescribing)

6 18. Respondent is subject to disciplinary action under code section 2239 in
7 that he used both prescription and illegal drugs, Ecstasy, Lorcet, and Ritalin, among others, at
8 least between July and November 2001. Paragraphs 14 (a) through (aa), and paragraph 15 are
9 incorporated by reference as if fully set forth herein.

10 FOURTH CAUSE FOR DISCIPLINE

11 (Violation of Drug Statutes)

12 19. Respondent is subject to disciplinary action under code section 2238 in
13 that he violated federal and state regulations concerning dangerous drugs or controlled
14 substances. The circumstances are as follows:

15 a. Respondent violated California Health and Safety Code
16 section 11154 when he furnished an illegal drug, Ecstasy, to N.B. and A.I., as
17 alleged in paragraph 14 (a) through (p) which is incorporated by reference as if
18 fully set forth herein.

19 b. Respondent violated California Health and Safety Code
20 section 11154 when he furnished an illegal drug, methamphetamine, to E.E. as
21 alleged in paragraph 14 (q) through (w) which is incorporated by reference as if
22 fully set forth herein.

23 c. Respondent violated California Health and Safety Code
24 sections 11153, 11154, and 11190 by giving M.C. the prescription drug, Depokote
25 in the absence of a prescription and in an unlabeled bottle as alleged in Paragraph
26 14 (x) through (aa) which is incorporated by reference as if fully set forth herein.

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1 d. Respondent violated California Health and Safety Code
2 sections 11153, 11154, and 11190 by maintaining schedule II and III drugs in
3 improperly marked bottles.

4 FIFTH CAUSE FOR DISCIPLINE

5 (Sexual Abuse or Misconduct)


6 20. Respondent is subject to disciplinary action under section 726 in that he
7 committed acts constituting sexual abuse or misconduct against N.B., A.I., E.E., and M.C. as
8 alleged in paragraph 14 (a) through (aa) which is incorporated by reference as if fully set forth
9 herein.

10 PRAYER

11 WHEREFORE, Complainant requests that a hearing be held on the matters herein
12 alleged, and that following the hearing, the Division of Medical Quality issue a decision:

- 13 1. Revoking or suspending Physician's and Surgeon's Certificate No.
14 G18886, issued to Harold H. Bloomfield, M.D.;
- 15 2. Revoking, suspending or denying approval of Harold H. Bloomfield,
16 M.D.'s authority to supervise physician's assistants, pursuant to section 3527 of the Code;
- 17 3. Ordering Harold H. Bloomfield, M.D. to pay the Division of Medical
18 Quality the reasonable costs of the investigation and enforcement of this case, and, if placed on
19 probation, the costs of probation monitoring;
- 20 4. Taking such other and further action as deemed necessary and proper.

21 DATED: March 27, 2002.

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24 RON JOSEPH, CHIEF OF ENFORCEMENT
25 Executive Director
26 Medical Board of California
27 Department of Consumer Affairs
28 State of California
Complainant