

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

In the Matter of the Accusation Against:

GEOFFREY ANGELO DIBELLA, M.D.

**Physician's & Surgeon's
Certificate No. G 21681**

Respondent.

Case No. 800-2020-064569

DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on September 15, 2023.

IT IS SO ORDERED: August 17, 2023.

MEDICAL BOARD OF CALIFORNIA



**Laurie Rose Lubiano, J.D., Chair
Panel A**

1. ROB BONTA
Attorney General of California
2. ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
3. KAROLYN M. WESTFALL
Deputy Attorney General
4. State Bar No. 234540
600 West Broadway, Suite 1800
5. San Diego, CA 92101
P.O. Box 85266
6. San Diego, CA 92186-5266
Telephone: (619) 738-9465
7. Facsimile: (619) 645-2061

8. *Attorneys for Complainant*

9.

10. **BEFORE THE**
11. **MEDICAL BOARD OF CALIFORNIA**
12. **DEPARTMENT OF CONSUMER AFFAIRS**
13. **STATE OF CALIFORNIA**

13. In the Matter of the Accusation Against:
14. **GEOFFREY ANGELO DI BELLA, M.D.**
15. **229 South State College Blvd.**
Anaheim, CA 92806
16. **Physician's and Surgeon's Certificate**
17. **No. G 21681,**

Case No. 800-2020-064569

OAH No. 2023010815

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

18. Respondent.

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

21. **PARTIES**

22. 1. Reji Varghese (Complainant) is the Interim Executive Director of the Medical Board
23. of California (Board). He brought this action solely in his official capacity and is represented in
24. this matter by Rob Bonta, Attorney General of the State of California, by Karolyn M. Westfall,
25. Deputy Attorney General.

26. 2. Respondent Geoffrey Angelo Dibella, M.D. (Respondent) is represented in this
27. proceeding by attorney Raymond J. McMahon, Esq., whose address is: 5440 Trabuco Road
28. Irvine, CA 92620.

1 2020-064569, and agrees that he has thereby subjected his Physician's and Surgeon's Certificate
2 No. G 21681 to disciplinary action.

3 10. Respondent further agrees that if an accusation is filed against him in the future
4 before the Medical Board of California, all of the charges and allegations contained in Accusation
5 No. 800-2020-064569, shall be deemed true, correct, and fully admitted by Respondent for
6 purposes of any such proceeding or any other licensing proceeding involving Respondent in the
7 State of California or elsewhere.

8 11. Respondent agrees that his Physician's and Surgeon's Certificate No. G 21681 is
9 subject to discipline and he agrees to be bound by the Board's imposition of discipline as set forth
10 in the Disciplinary Order below.

11 CONTINGENCY

12 12. This stipulation shall be subject to approval by the Medical Board of California.
13 Respondent understands and agrees that counsel for Complainant and the staff of the Medical
14 Board of California may communicate directly with the Board regarding this stipulation and
15 settlement, without notice to or participation by Respondent or his counsel. By signing the
16 stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek
17 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
18 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
19 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
20 action between the parties, and the Board shall not be disqualified from further action by having
21 considered this matter.

22 13. The parties understand and agree that Portable Document Format (PDF) and facsimile
23 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
24 signatures thereto, shall have the same force and effect as the originals.

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

28 ///

1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G 21681 issued
3 to Respondent Geoffrey Angelo Dibella, M.D., is hereby Publicly Reprimanded pursuant to
4 California Business and Professions Code section 2227, subdivision (a)(4). This Public
5 Reprimand, which is issued in connection with Accusation No. 800-2020-064569, is as follows:

6 Between 2009 and 2020, you provided care and treatment to three patients that
7 involved prescribing controlled substances. During that time, you maintained sparse
8 and incomplete records for all three patients, as more fully described in Accusation
9 No. 800-2020-064569.

10 1. **PRESCRIBING PRACTICES COURSE.** Within 60 calendar days of the effective
11 date of this Decision, Respondent shall enroll in a course in prescribing practices approved in
12 advance by the Board or its designee. Respondent shall provide the approved course provider
13 with any information and documents that the approved course provider may deem pertinent.
14 Respondent shall participate in and successfully complete the classroom component of the course
15 not later than six (6) months after Respondent's initial enrollment. Respondent shall successfully
16 complete any other component of the course within one (1) year of the effective date of this
17 Decision. The prescribing practices course shall be at Respondent's expense and shall be in
18 addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

19 A prescribing practices course taken after the acts that gave rise to the charges in the
20 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board
21 or its designee, be accepted towards the fulfillment of this condition if the course would have
22 been approved by the Board or its designee had the course been taken after the effective date of
23 this Decision.

24 Respondent shall submit a certification of successful completion to the Board or its
25 designee not later than 15 calendar days after successfully completing the course, or not later than
26 15 calendar days after the effective date of the Decision, whichever is later.

27 Any failure to fully comply with this term and condition of the Decision and Order shall
28 constitute unprofessional conduct and will subject Respondent's Physician's and Surgeon's
Certificate to further disciplinary action.

1 2. MEDICAL RECORD KEEPING COURSE. Within 60 calendar days of the effective
2 date of this Decision, Respondent shall enroll in a course in medical record keeping approved in
3 advance by the Board or its designee. Respondent shall provide the approved course provider
4 with any information and documents that the approved course provider may deem pertinent.
5 Respondent shall participate in and successfully complete the classroom component of the course
6 not later than six (6) months after Respondent's initial enrollment. Respondent shall successfully
7 complete any other component of the course within one (1) year of the effective date of this
8 Decision. The medical record keeping course shall be at Respondent's expense and shall be in
9 addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

10 A medical record keeping course taken after the acts that gave rise to the charges in the
11 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board
12 or its designee, be accepted towards the fulfillment of this condition if the course would have
13 been approved by the Board or its designee had the course been taken after the effective date of
14 this Decision.

15 Respondent shall submit a certification of successful completion to the Board or its
16 designee not later than 15 calendar days after successfully completing the course, or not later than
17 15 calendar days after the effective date of the Decision, whichever is later.

18 Any failure to fully comply with this term and condition of the Decision and Order shall
19 constitute unprofessional conduct and will subject Respondent's Physician's and Surgeon's
20 Certificate to further disciplinary action.

21 3. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby
22 ordered to reimburse the Board its costs of investigation and enforcement in the amount of
23 \$15,426.00 (fifteen thousand four hundred twenty-six dollars and zero cents). Costs shall be
24 payable to the Medical Board of California.

25 Payment must be made in full within 30 calendar days of the effective date of the Order, or
26 by a payment plan approved by the Medical Board of California. Any and all requests for a
27 payment plan shall be submitted in writing by respondent to the Board. All costs shall be paid in
28 full within one (1) year of the effective date of this Decision.

1 The filing of bankruptcy by respondent shall not relieve respondent of the responsibility to
2 repay investigation and enforcement costs.

3 Any failure to fully comply with this term and condition of the Decision and Order shall
4 constitute unprofessional conduct and will subject Respondent's Physician's and Surgeon's
5 Certificate to further disciplinary action.

6 **ACCEPTANCE**

7 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
8 discussed it with my attorney, Raymond J. McMahon, Esq. I understand the stipulation and the
9 effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated
10 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
11 bound by the Decision and Order of the Medical Board of California.

12
13 DATED: 6/4/2023 Geoffrey Angelo Dibella MD
14 GEOFFREY ANGELO DIBELLA, M.D.
Respondent

15 I have read and fully discussed with Respondent Geoffrey Angelo Dibella, M.D., the terms
16 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
17 Order. I approve its form and content.

18 DATED: June 5, 2023 Raymond J. McMahon
19 RAYMOND J. MCMAHON, ESQ.
Attorney for Respondent

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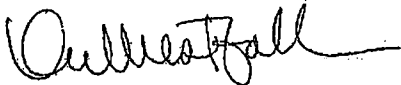
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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California.

DATED: 6/5/23

Respectfully submitted,
ROB BONTA
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General

KAROLYN M. WESTFALL
Deputy Attorney General
Attorneys for Complainant

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Supervising Deputy Attorney General
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7 Facsimile: (619) 645-2061

8 *Attorneys for Complainant*

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

11

12

13

In the Matter of the Accusation Against:

Case No. 800-2020-064569

14

GEOFFREY ANGELO DI BELLA, M.D.
229 South State College Blvd,
15 Anaheim, CA 92806

A C C U S A T I O N

15

16

Physician's and Surgeon's Certificate
No. G 21681,

17

Respondent.

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PARTIES

21

1. Reji Varghese (Complainant) brings this Accusation solely in his official capacity as
22 the Deputy Director of the Medical Board of California, Department of Consumer Affairs
23 (Board).

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2. On or about November 9, 1971, the Medical Board issued Physician's and Surgeon's
25 Certificate No. G 21681 to Geoffrey Angelo Di Bella, M.D. (Respondent). The Physician's and
26 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
27 herein and will expire on January 31, 2025, unless renewed.

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JURISDICTION

1
2 3. This Accusation is brought before the Board, under the authority of the following
3 laws. All section references are to the Business and Professions Code (Code) unless otherwise
4 indicated.

5 4. Section 2227 of the Code states, in pertinent part:

6 (a) A licensee whose matter has been heard by an administrative law judge of
7 the Medical Quality Hearing Panel as designated in Section 11371 of the Government
8 Code, or whose default has been entered, and who is found guilty, or who has entered
9 into a stipulation for disciplinary action with the board, may, in accordance with the
10 provisions of this chapter:

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

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

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

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

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

21 ...

22 5. Section 2234 of the Code, state, in pertinent part:

23 The board shall take action against any licensee who is charged with
24 unprofessional conduct. In addition to other provisions of this article, unprofessional
25 conduct includes, but is not limited to, the following:

26 (a) Violating or attempting to violate, directly or indirectly, assisting in or
27 abetting the violation of, or conspiring to violate any provision of this chapter.

28 (b) Gross negligence.

 (c) Repeated negligent acts. To be repeated, there must be two or more
negligent acts or omissions. An initial negligent act or omission followed by a
separate and distinct departure from the applicable standard of care shall constitute
repeated negligent acts.

 (1) An initial negligent diagnosis followed by an act or omission medically
appropriate for that negligent diagnosis of the patient shall constitute a single
negligent act.

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1 (2) When the standard of care requires a change in the diagnosis, act, or
2 omission that constitutes the negligent act described in paragraph (1), including, but
3 not limited to, a reevaluation of the diagnosis or a change in treatment, and the
4 licensee's conduct departs from the applicable standard of care, each departure
5 constitutes a separate and distinct breach of the standard of care.

6 6. Section 2266 of the Code states: The failure of a physician and surgeon to maintain
7 adequate and accurate records relating to the provision of services to their patients constitutes
8 unprofessional conduct.

9 COST RECOVERY

10 7. Business and Professions Code section 125.3 states that:

11 (a) Except as otherwise provided by law, in any order issued in resolution of a
12 disciplinary proceeding before any board within the department or before the
13 Osteopathic Medical Board upon request of the entity bringing the proceeding, the
14 administrative law judge may direct a licensee found to have committed a violation or
15 violations of the licensing act to pay a sum not to exceed the reasonable costs of the
16 investigation and enforcement of the case.

17 (b) In the case of a disciplined licentiate that is a corporation or a partnership,
18 the order may be made against the licensed corporate entity or licensed partnership.

19 (c) A certified copy of the actual costs, or a good faith estimate of costs where
20 actual costs are not available, signed by the entity bringing the proceeding or its
21 designated representative shall be prima facie evidence of reasonable costs of
22 investigation and prosecution of the case. The costs shall include the amount of
23 investigative and enforcement costs up to the date of the hearing, including, but not
24 limited to, charges imposed by the Attorney General.

25 (d) The administrative law judge shall make a proposed finding of the amount
26 of reasonable costs of investigation and prosecution of the case when requested
27 pursuant to subdivision (a). The finding of the administrative law judge with regard
28 to costs shall not be reviewable by the board to increase the cost award. The board
may reduce or eliminate the cost award, or remand to the administrative law judge if
the proposed decision fails to make a finding on costs requested pursuant to
subdivision (a).

(e) If an order for recovery of costs is made and timely payment is not made as
directed in the board's decision, the board may enforce the order for repayment in any
appropriate court. This right of enforcement shall be in addition to any other rights
the board may have as to any licensee to pay costs.

(f) In any action for recovery of costs, proof of the board's decision shall be
conclusive proof of the validity of the order of payment and the terms for payment.

(g)(1) Except as provided in paragraph (2), the board shall not renew or
reinstate the license of any licensee who has failed to pay all of the costs ordered
under this section.

1 (2) Notwithstanding paragraph (1), the board may, in its discretion,
2 conditionally renew or reinstate for a maximum of one year the license of any
3 licensee who demonstrates financial hardship and who enters into a formal agreement
with the board to reimburse the board within that one-year period for the unpaid
costs.

4 (h) All costs recovered under this section shall be considered a reimbursement
5 for costs incurred and shall be deposited in the fund of the board recovering the costs
to be available upon appropriation by the Legislature.

6 (i) Nothing in this section shall preclude a board from including the recovery of
7 the costs of investigation and enforcement of a case in any stipulated settlement.

8 (j) This section does not apply to any board if a specific statutory provision in
9 that board's licensing act provides for recovery of costs in an administrative
disciplinary proceeding.

10 FIRST CAUSE FOR DISCIPLINE

11 (Gross Negligence)

12 8. Respondent has subjected his Physician's and Surgeon's Certificate No. G 21681 to
13 disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (b), of
14 the Code, in that he was grossly negligent in his care and treatment of Patient A,¹ as more
15 particularly alleged hereinafter:

16 PATIENT A

17 9. On or about June 15, 2009,² Patient A, a then thirty-three-year-old female, presented
18 to Respondent for the first time for psychiatric treatment with complaints that included
19 depression, anxiety, stress, poor concentration, and poor sleep. Patient A had previously been
20 diagnosed with bipolar disorder and prescribed Lamictal³ and Ambien.⁴

21
22 ¹ To protect the privacy of the patients involved, the patients' names have not been
23 included in this pleading. Respondent is aware of the identity of the patients referred to herein.

24 ² Conduct occurring more than seven (7) years from the filing date of this Accusation is
for informational purposes only and is not alleged as a basis for disciplinary action.

25 ³ Lamictal (brand name for Lamotrigine) is an anticonvulsant medication used to treat
26 seizures and bipolar disorder. It is a dangerous drug pursuant to section 4022 of the Code.

27 ⁴ Ambien (brand name for zolpidem) is a Schedule IV controlled substance pursuant to
28 Health and Safety Code section 11057, subdivision (d), and a dangerous drug pursuant to section
4022 of the Code. It is a sedative used for the short-term treatment of insomnia.

1 10. Between in or around 2009, and in or around 2020, Respondent provided psychiatric
2 treatment to Patient A for bipolar disorder, attention deficit disorder (ADD), and insomnia that
3 included both controlled and non-controlled medications. Throughout that time, Respondent's
4 handwritten notes in Patient A's chart are short, difficult to read, and rarely include significant
5 information related to his neurobehavioral exam, assessment, interventions, or goals.

6 11. On or about July 27, 2017, Patient A presented to Respondent for a follow-up visit.
7 At that time, Patient A reported she took Lamictal, Ambien, Vyvanse,⁵ and dextroamphetamine.⁶

8 12. On or about December 17, 2018, Patient A presented to Respondent for a follow-up
9 visit for the first time since on or about July 27, 2017. At that time, Patient A reported she took
10 Lamictal, Ambien, and Vyvanse every day, and she took Adderall as needed.

11 13. Between in or around December 2017, and in or around February 2020, Respondent
12 provided monthly prescriptions to Patient A for controlled medications that included, but was not
13 limited to, Ambien, Vyvanse, and amphetamines. Throughout that time, Respondent only saw
14 Patient A for approximately five (5) clinical visits.

15 14. Respondent committed gross negligence in his care and treatment of Patient A, which
16 included, but was not limited to, providing monthly prescriptions for controlled substances
17 between in or around July 2017, and in or around February 2020, and only documenting
18 approximately six (6) clinical visits with the patient throughout that time period.

19 **SECOND CAUSE FOR DISCIPLINE**

20 **(Repeated Negligent Acts)**

21 15. Respondent has further subjected his Physician's and Surgeon's Certificate No.
22 G 21681 to disciplinary action under sections 2227 and 2234, as defined by section 2234,

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24 ⁵ Vyvanse (brand name for lisdexamfetamine) is a Schedule II controlled substance
25 pursuant to Health and Safety Code section 11055, subdivision (d), and a dangerous drug
26 pursuant to section 4022 of the Code. It is a stimulant medication used to treat attention-deficit
hyperactivity disorder (ADHD) and binge-eating disorder.

27 ⁶ Dextroamphetamine (brand name Adderall) is a Schedule II controlled substance
28 pursuant to Health and Safety Code section 11055, subdivision (d), and a dangerous drug
and narcolepsy.

1 subdivision (c), of the Code, in that he committed repeated negligent acts in his care and
2 treatment of Patients A, B, and C, as more particularly alleged hereinafter:

3 **PATIENT B**

4 16. On or about November 20, 2013, Patient B, a then twenty-year-old female, presented
5 to Respondent for the first time for psychiatric treatment with complaints of ADHD and anxiety.
6 Patient B reported that she was not taking any medication at that time, but had previously been
7 prescribed Lexapro,⁷ Zoloft,⁸ and Prozac.⁹ On exam, Respondent found Patient B to be
8 disorganized, hyperactive, and depressed. At the conclusion of the visit, Respondent diagnosed
9 Patient B with severe anxiety disorder, panic disorder, and ADHD.

10 17. Between on or about November 20, 2013 and on or about July 29, 2019, Respondent
11 provided psychiatric treatment to Patient B for anxiety disorder, panic disorder, and ADHD, that
12 included prescriptions for both controlled and non-controlled medications. Throughout that time,
13 Respondent's handwritten notes in Patient B's chart are short, difficult to read, and rarely include
14 significant information related to his neurobehavioral exam, assessment, interventions, or goals.

15 18. On or about November 29, 2017, Patient B presented to Respondent for a follow-up.
16 At that time, Patient B reported that she took Xanax¹⁰ a few times each week. At the conclusion
17 of that visit, Respondent prescribed Patient B clonazepam.¹¹ Patient B's chart did not include a
18 documented reason for the clonazepam prescription on that date.

19 ⁷ Lexapro (brand name for escitalopram) is a selective serotonin reuptake inhibitor (SSRI)
20 medication used to treat depression and anxiety, and is a dangerous drug pursuant to section 4022
of the Code.

21 ⁸ Zoloft (brand name for sertraline) is a SSRI medication used to treat depression,
22 obsessive-compulsive disorder, PTSD, anxiety, and panic disorder. It is a dangerous drug
pursuant to section 4022 of the Code.

23 ⁹ Prozac (brand name for fluoxetine) is a SSRI medication used to treat depression,
24 obsessive-compulsive disorder, bulimia, and panic disorder. It is a dangerous drug pursuant to
section 4022 of the Code.

25 ¹⁰ Xanax (brand name for alprazolam) is a Schedule IV controlled substance pursuant to
26 Health and Safety Code section 11057, subdivision (d), and a dangerous drug pursuant to section
4022 of the Code. It is a benzodiazepine medication used to treat anxiety and panic disorder.

27 ¹¹ Clonazepam (brand name Klonopin) is a Schedule IV controlled substance pursuant to
28 Health and Safety Code section 11057, subdivision (d), and a dangerous drug pursuant to section
4022 of the Code. It is an anti-anxiety medication in the benzodiazepine family.

1 19. Between in or around January 2018, and in or around July 2019, Respondent
2 prescribed Patient B Xanax and clonazepam. Throughout that time, Patient B's chart did not
3 include a documented reason for simultaneously prescribing the patient two benzodiazepines.

4 PATIENT C

5 20. On or about September 5, 2012, Patient C, a then forty-four-year-old female,
6 presented to Respondent for the first time for psychiatric treatment with complaints that included
7 depression, anxiety, fatigue, migraine, and suicidal thoughts. Patient C had a complex psychiatric
8 history that included a prior hospitalization and outpatient treatment for an eating disorder and
9 depression. At that initial visit, Patient C signed a release for her records from her treating
10 psychologist and neurologist.

11 21. Between on or about September 5, 2012, and on or about October 6, 2020,
12 Respondent provided psychiatric treatment to Patient C for bipolar disorder, depression, anxiety,
13 and ADD, that included prescriptions for both controlled and non-controlled medications.
14 Throughout that time, Respondent's handwritten notes in Patient C's chart are short, difficult to
15 read, and rarely include significant information related to his neurobehavioral exam, assessment,
16 interventions, or goals.

17 22. Between in or around 2012, and in or around 2020, Respondent was aware that
18 Patient C received care and treatment from various specialists including a psychologist,
19 neurologist, and pain management physician. Throughout that time, Patient C's chart contained
20 no records from these specialists, and Respondent did not discuss and/or document any
21 discussions with these specialists regarding their coordination of Patient C's care.

22 23. On or about January 31, 2020, Patient C presented to Respondent for a follow-up visit
23 with complaints of severe symptoms related to her depression, sleep disturbance, low energy, and
24 migraines. Patient C reported that she took a variety of medications that included Topamax,¹²

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26 _____
27 ¹² Topamax (brand name for topiramate) is an anticonvulsant and nerve pain medication
28 that can be used to prevent migraines, and a dangerous drug pursuant to section 4022 of the Code.

1 Latuda,¹³ Lamictal, Ritalin,¹⁴ Klonopin, Lunesta,¹⁵ and Ambien. At the conclusion of that visit,
2 Respondent prescribed Patient C 15 tabs of Percocet.¹⁶ Patient C's chart did not include a
3 documented reason for the Percocet prescription at that time:

4 24. Between on or about January 31, 2020, and on or about June 5, 2020, Respondent
5 wrote Patient C four prescriptions for 15 tabs of Percocet. Throughout that time, Patient C's chart
6 did not include a documented reason for prescribing Patient C an opioid medication.

7 25. Respondent committed negligence in his care and treatment of Patients A, B, and C,
8 which included, but was not limited to, the following:

9 A. Paragraphs 8 through 24, above, are hereby incorporated by reference and
10 realleged as if fully set forth herein;

11 B. Maintaining sparse and incomplete treatment records for Patient B that, among
12 other things, fail to include a documented reason for simultaneously prescribing
13 Patient B two benzodiazepines;

14 C. Prescribing opioid pain medication to Patient C without a documented reason;
15 and

16 D. Maintaining sparse and incomplete treatment records for Patient C that, among
17 other things, fail to include discussions with specialists regarding their
18 coordination of Patient C's care.

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22 _____
23 ¹³ Latuda (brand name for lurasidone) is an antipsychotic medication used to treat
schizophrenia, and a dangerous drug pursuant to section 4022 of the Code.

24 ¹⁴ Ritalin (brand name for methylphenidate) is a stimulant medication used to treat ADHD
25 and narcolepsy, and a dangerous drug pursuant to section 4022 of the Code.

26 ¹⁵ Lunesta (brand name for eszopiclone) is a sedative medication used to treat insomnia,
and a dangerous drug pursuant to section 4022 of the Code.

27 ¹⁶ Percocet (brand name for oxycodone and acetaminophen) is a Schedule II controlled
28 substance pursuant to Health and Safety Code section 11055, subdivision (b), and a dangerous
drug pursuant to section 4022 of the Code. It is an opioid medication used to treat pain.

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THIRD CAUSE FOR DISCIPLINE

(Failure to Maintain Adequate and Accurate Records)

26. Respondent has further subjected his Physician's and Surgeon's Certificate No. G 21681 to disciplinary action under sections 2227 and 2234, as defined by section 2266, of the Code, in that Respondent failed to maintain adequate and accurate records regarding his care and treatment of Patients A, B, and C, as more particularly alleged in paragraphs 8 through 25(D), above, which are hereby incorporated by reference and realleged as if fully set forth herein.

DISCIPLINARY CONSIDERATIONS

27. To determine the degree of discipline, if any, to be imposed on Respondent Geoffrey Angelo Di Bella, M.D., Complainant alleges that on or about May 5, 1989, in a prior disciplinary action entitled, *In the Matter of the Accusation Against Geoffrey Di Bella, M.D.*, before the Division of Medical Quality, Board of Medical Quality Assurance, in Case No. D-3591, Respondent's license was suspended for sixty (60) days and placed on probation for a period of ten (10) years subject to various terms and conditions of probation. Respondent's probation was terminated on or about July 11, 1996, and that Decision is now final and is incorporated by reference as if fully set forth herein.

PRAYER

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

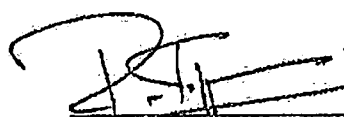
1. Revoking or suspending Physician's and Surgeon's Certificate No. G 21681, issued to Respondent, Geoffrey Angelo Di Bella, M.D.;
2. Revoking, suspending, or denying approval of Respondent, Geoffrey Angelo Di Bella, M.D.'s authority to supervise physician assistants and advanced practice nurses;
3. Ordering Respondent, Geoffrey Angelo Di Bella, M.D., to pay the Board the costs of the investigation and enforcement of this case, and if placed on probation, the costs of probation monitoring; and

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

DATED: JAN 11 2023



REJI VARGHESE
Deputy Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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