

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

**In the Matter of the First Amended
Accusation Against:**

David Brody, M.D.

**Physician's and Surgeon's
Certificate No. G 56780**

Respondent.

Case No. 800-2021-081126

DECISION

The attached Stipulated Surrender of License and 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 June 1, 2025.

IT IS SO ORDERED May 29, 2025.

MEDICAL BOARD OF CALIFORNIA



**Reji Varghese
Executive Director**

1 ROB BONTA
Attorney General of California
2 MACHAELA M. MINGARDI
Supervising Deputy Attorney General
3 C. HAY-MIE CHO
Deputy Attorney General
4 State Bar No. 282259
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5 San Francisco, CA 94102-7004
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E-mail: Haymie.Cho@doj.ca.gov
7 *Attorneys for Complainant*

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

11 In the Matter of the First Amended Accusation
12 Against:

13 **DAVID BRODY, M.D.**
14 **859 Washington Street, #203**
Red Bluff, CA 96080-2704

15 **Physician's and Surgeon's Certificate No. G**
16 **56780**

16 Respondent.

Case No. 800-2021-081126

OAH No. 2025010194

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

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

20 **PARTIES**

21 1. Reji Varghese (Complainant) is the Executive Director of the Medical Board of
22 California (Board). He brought this action solely in his official capacity and is represented in this
23 matter by Rob Bonta, Attorney General of the State of California, by C. Hay-Mie Cho, Deputy
24 Attorney General.

25 2. DAVID BRODY, M.D. (Respondent), is represented in this proceeding by attorney
26 Shannon V. Baker, whose address is: 765 University Avenue, Sacramento, CA 95825.

27 3. On or about February 24, 1986, the Board issued Physician's and Surgeon's
28 Certificate No. G 56780 to Respondent. That license was in full force and effect at all times

1 relevant to the charges brought in First Amended Accusation No. 800-2021-081126 and will
2 expire on November 30, 2025, unless renewed.

3 **JURISDICTION**

4 4. First Amended Accusation No. 800-2021-081126 was filed before the Board and is
5 currently pending against Respondent. Accusation No. 800-2021-081126 was previously filed
6 before the Board on July 20, 2024, and this Accusation and other statutorily required documents
7 were properly served on Respondent on the same date. Respondent timely filed his Notice of
8 Defense contesting the Accusation. The First Amended Accusation and all other statutorily
9 required documents were properly served on Respondent on April 7, 2025. A copy of First
10 Amended Accusation No. 800-2021-081126 is attached as Exhibit A and incorporated by
11 reference.

12 **ADVISEMENT AND WAIVERS**

13 5. Respondent has carefully read, fully discussed with counsel, and understands the
14 charges and allegations in First Amended Accusation No. 800-2021-081126. Respondent also
15 has carefully read, fully discussed with counsel, and understands the effects of this Stipulated
16 Surrender of License and Order.

17 6. Respondent is fully aware of his legal rights in this matter, including the right to a
18 hearing on the charges and allegations in the First Amended Accusation; the right to confront and
19 cross-examine the witnesses against him; the right to present evidence and to testify on his own
20 behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the
21 production of documents; the right to reconsideration and court review of an adverse decision;
22 and all other rights accorded by the California Administrative Procedure Act and other applicable
23 laws.

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

26 **CULPABILITY**

27 8. Respondent understands that the charges and allegations in First Amended
28 Accusation No. 800-2021-081126, if proven at a hearing, constitute cause for imposing discipline

1 upon his Physician's and Surgeon's Certificate.

2 9. For the purpose of resolving the First Amended Accusation without the expense and
3 uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could
4 establish a factual basis for the charges in the First Amended Accusation and that those charges
5 constitute cause for discipline. Respondent hereby gives up his right to contest that cause for
6 discipline exists based on those charges.

7 10. Respondent understands that by signing this stipulation he enables the Board to issue
8 an order accepting the surrender of his Physician's and Surgeon's Certificate without further
9 process.

10 CONTINGENCY

11 11. Business and Professions Code section 2224, subdivision (b), provides, in pertinent
12 part, that the Medical Board "shall delegate to its executive director the authority to adopt a ...
13 stipulation for surrender of a license."

14 12. Respondent understands that, by signing this stipulation, he enables the Executive
15 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his
16 Physician's and Surgeon's Certificate No. G 56780 without further notice to, or opportunity to be
17 heard by, Respondent.

18 13. This Stipulated Surrender of License and Disciplinary Order shall be subject to the
19 approval of the Executive Director on behalf of the Board. The parties agree that this Stipulated
20 Surrender of License and Disciplinary Order shall be submitted to the Executive Director for his
21 consideration in the above-entitled matter and, further, that the Executive Director shall have a
22 reasonable period of time in which to consider and act on this Stipulated Surrender of License and
23 Disciplinary Order after receiving it. By signing this stipulation, Respondent fully understands
24 and agrees that he may not withdraw his agreement or seek to rescind this stipulation prior to the
25 time the Executive Director, on behalf of the Medical Board, considers and acts upon it.

26 14. The parties agree that this Stipulated Surrender of License and Disciplinary Order
27 shall be null and void and not binding upon the parties unless approved and adopted by the
28 Executive Director on behalf of the Board, except for this paragraph, which shall remain in full

1 force and effect. Respondent fully understands and agrees that in deciding whether or not to
2 approve and adopt this Stipulated Surrender of License and Disciplinary Order, the Executive
3 Director and/or the Board may receive oral and written communications from its staff and/or the
4 Attorney General's Office. Communications pursuant to this paragraph shall not disqualify the
5 Executive Director, the Board, any member thereof, and/or any other person from future
6 participation in this or any other matter affecting or involving respondent. In the event that the
7 Executive Director on behalf of the Board does not, in his discretion, approve and adopt this
8 Stipulated Surrender of License and Disciplinary Order, with the exception of this paragraph, it
9 shall not become effective, shall be of no evidentiary value whatsoever, and shall not be relied
10 upon or introduced in any disciplinary action by either party hereto. Respondent further agrees
11 that should this Stipulated Surrender of License and Disciplinary Order be rejected for any reason
12 by the Executive Director on behalf of the Board, Respondent will assert no claim that the
13 Executive Director, the Board, or any member thereof, was prejudiced by its/his/her review,
14 discussion and/or consideration of this Stipulated Surrender of License and Disciplinary Order or
15 of any matter or matters related hereto.

16 **ADDITIONAL PROVISIONS**

17 15. This Stipulated Surrender of License and Disciplinary Order is intended by the parties
18 herein to be an integrated writing representing the complete, final, and exclusive embodiment of
19 the agreements of the parties in the above-entitled matter.

20 16. The parties agree that copies of this Stipulated Surrender of License and Disciplinary
21 Order, including copies of the signatures of the parties, may be used in lieu of original documents
22 and signatures and further, that such copies shall have the same force and effect as originals.

23 17. In consideration of the foregoing admissions and stipulations, the parties agree the
24 Executive Director of the Board may, without further notice to or opportunity to be heard by
25 Respondent, issue and enter the following Disciplinary Order on behalf of the Board:

26 **ORDER**

27 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G 56780, issued
28 to Respondent DAVID BRODY, M.D., is surrendered and accepted by the Board.

1 1. The surrender of Respondent's Physician's and Surgeon's Certificate and the
2 acceptance of the surrendered license by the Board shall constitute the imposition of discipline
3 against Respondent. This stipulation constitutes a record of the discipline and shall become a part
4 of Respondent's license history with the Board.

5 2. Respondent shall lose all rights and privileges as a Physician and Surgeon in
6 California as of June 1, 2025.

7 3. Respondent shall cause to be delivered to the Board his pocket license and, if one was
8 issued, his wall certificate on or before June 1, 2025.

9 4. If Respondent ever files an application for licensure or a petition for reinstatement in
10 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
11 comply with all the laws, regulations and procedures for reinstatement of a revoked or
12 surrendered license in effect at the time the petition is filed, and all of the charges and allegations
13 contained in First Amended Accusation No. 800-2021-081126 shall be deemed to be true, correct
14 and admitted by Respondent when the Board determines whether to grant or deny the petition.

15 5. If Respondent should ever apply or reapply for a new license or certification, or
16 petition for reinstatement of a license, by any other health care licensing agency in the State of
17 California, all of the charges and allegations contained in First Amended Accusation No. 800-
18 2021-081126 shall be deemed to be true, correct, and admitted by Respondent for the purpose of
19 any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

20 6. Respondent shall pay the agency its costs of investigation and enforcement in the
21 amount of \$47,594.78 prior to issuance of a new or reinstated license.

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ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney, Shannon V. Baker. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: May 8, 2025

DAVID BRODY, M.D.

Respondent

I have read and fully discussed with Respondent DAVID BRODY, M.D. the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: May 8, 2025

SHANNON V. BAKER

Attorney for Respondent

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ENDORSEMENT

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

DATED: May 19, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California
MACHAELA M. MINGARDI
Supervising Deputy Attorney General

C. Hay-Mie Cho

C. HAY-MIE CHO
Deputy Attorney General
Attorneys for Complainant

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44600463

Exhibit A

First Amended Accusation No. 800-2021-081126

1 ROB BONTA
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2 MACHAELA M. MINGARDI
Supervising Deputy Attorney General
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8 **BEFORE THE**
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12 In the Matter of the First Amended Accusation
Against:

13 **DAVID BRODY, M.D.**
14 **859 Washington Street, #203**
15 **Red Bluff, CA 96080**

16 **Physician's and Surgeon's Certificate**
No. G 56780,

17 **Respondent.**

Case No. 800-2021-081126

OAH Case No. 2025010194

FIRST AMENDED ACCUSATION

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20 **PARTIES**

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

24 2. On or about February 24, 1986, the Medical Board issued Physician's and Surgeon's
25 Certificate Number G 56780 to David Brody, 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 November 30, 2025, unless renewed.

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4. Section 802.1 states as follows:

(A) The bringing of an indictment or information charging a felony against the licensee.

(2) The report required by this subdivision shall be made in writing within 30 days of the date of the bringing of the indictment or information or of the conviction.

5. Section 2227 of the Code provides that a licensee who is found guilty under the

6. Section 2234 of the Code states:

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

(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.

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 (d) Incompetence.

7 (e) The commission of any act involving dishonesty or corruption that is
8 substantially related to the qualifications, functions, or duties of a physician and
9 surgeon.

10 (f) Any action or conduct that would have warranted the denial of a certificate.

11 (g) The failure by a certificate holder, in the absence of good cause, to attend
12 and participate in an interview by the board no later than 30 calendar days after being
13 notified by the board. This subdivision shall only apply to a certificate holder who is
14 the subject of an investigation by the board.

15 (h) Any action of the licensee, or another person acting on behalf of the
16 licensee, intended to cause their patient or their patient's authorized representative to
17 rescind consent to release the patient's medical records to the board or the
18 Department of Consumer Affairs, Health Quality Investigation Unit.

19 (i) Dissuading, intimidating, or tampering with a patient, witness, or any person
20 in an attempt to prevent them from reporting or testifying about a licensee.

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

24 COST RECOVERY

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

24 DEFINITIONS

25 9. Alprazolam, known by the trade name Xanax, is a psychotropic triazolo analogue of
26 the 1,4 benzodiazepine class of central nervous system-active compounds. Xanax is used for the
27 management of anxiety disorders or for the short-term relief of the symptoms of anxiety. It is a
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1 dangerous drug as defined in section 4022 of the Code and a Schedule IV controlled substance
2 and narcotic as defined by section 11057, subdivision (d), of the Health and Safety Code.

3 10. Amitriptyline, known by the trade name Elavil, is a dangerous drug as defined in
4 section 4022 of the Code. It is an antidepressant with sedative effects. Lower dosages of
5 amitriptyline are recommended for elderly patients.

6 11. Aripiprazole, known by the trade name Abilify, is an antipsychotic medication. It
7 works by changing the actions of chemicals in the brain. Aripiprazole is used to treat the
8 symptoms of psychotic conditions such as schizophrenia and bipolar disorder (manic depression).

9 12. Carisoprodol, known by the trade name SOMA, is a muscle-relaxant and sedative. It
10 is a dangerous drug as defined in section 4022 of the Code, and a Schedule IV controlled
11 substance as defined by section 11057 of the Health and Safety Code.

12 13. Clonazepam, known by the trade name Klonopin, is an anticonvulsant of the
13 benzodiazepine class of drugs. It is a dangerous drug as defined in section 4022 of the Code, and
14 a Schedule IV controlled substance as defined by section 11057 of the Health and Safety Code. It
15 produces central nervous system depression and should be used with caution with other central
16 nervous system depressant drugs.

17 14. Diazepam, known by the trade name Valium, is a psychotropic drug for the
18 management of anxiety disorders or for the short-term relief of the symptoms of anxiety. It is a
19 dangerous drug as defined in section 4022 and a Schedule IV controlled substance as defined by
20 section 11057 of the Health and Safety Code. Diazepam can produce psychological and physical
21 dependence and it should be prescribed with caution particularly to addiction-prone individuals
22 (such as drug addicts and alcoholics) because of the predisposition of such patients to habituation
23 and dependence.

24 15. Fluoxetine, known by the trade name Prozac, is an antidepressant, and a dangerous
25 drug within the meaning of Business and Professions code section 4022 and a Schedule IV
26 controlled substance as defined by section 11057 of the Health and Safety Code. Prozac is an
27 antidepressant agent chemically unrelated to tricyclic, tetracyclic, or other available
28 antidepressant agents.

16. Olanzapine, known by the trade name Zyprexa, is a psychotropic agent that belongs to the thienobenzodiazepine class. It is a dangerous drug as defined by section 4022 of the Code. Olanzapine is indicated for the management of the manifestations of psychotic disorders, the treatment of schizophrenia, and the short term treatment of the acute manic episodes associated with Bipolar I disorder.

17. Ziprasidone, known by the trade name Geodon, is a Schedule I atypical antipsychotic, approved for the treatment of schizophrenia, bipolar mania, and acute agitation in individuals with schizophrenia. It is a dangerous drug as defined in section 4022 of the Business and Professions Code.

FACTUAL ALLEGATIONS

Respondent's Treatment of Patient 1

18. On or about May 7, 2015, Respondent commenced treating Patient 1,¹ a then 39-year-old female, through the Contra Costa County health services. Patient 1 allegedly had complaints of depression, was at significant risk of suicide or self-harm, and had possible psychotic or dissociative symptoms.

19. In or about August 2017, Respondent subsequently left his position with the county medical system and went into private practice. Respondent continued to treat Patient 1 in his private practice. Respondent has no medical records of his treatment of Patient 1 from August 2017 through July 2022. Medical records from a pharmacy show that Respondent prescribed controlled substances to Patient 1 beginning in 2015.

20. While in private practice, Respondent began prescribing carisoprodol after another treatment provider told Patient 1 that the physician could not continue prescribing the drug to her for Patient 1's complaints of chronic pain related to lupus, rheumatoid arthritis, and/or fibromyalgia.

21. From August 2017 through July 2022, there were no records that Respondent consulted with any other physicians, such as rheumatology specialists, or referred to

¹ The patient is identified by a number to protect their privacy. The patient's name will be disclosed in discovery.

1 contemporary information about the treatment of rheumatological conditions for Patient 1. There
2 was also no evidence that Respondent supplemented the history provided by Patient 1 about her
3 condition by review of previous treatment records.

4 22. In fact, there was no record of a history of Patient 1's rheumatological conditions,
5 such as rheumatoid arthritis, lupus, and fibromyalgia. There were no records of any physical
6 examination findings in connection with Respondent's treatment of Patient 1's rheumatological
7 conditions.

8 23. Prescription records show that from August 2017 through June 2022, Respondent
9 prescribed to Patient 1 the antidepressants amitriptyline and fluoxetine; the benzodiazepine
10 anxiolytics alprazolam, clonazepam, and diazepam; and the antipsychotic medications
11 aripiprazole, olanzapine, and ziprasidone. No documentation evidences that Respondent
12 completed an adequate psychiatric evaluation to determine the indication for these psychiatric
13 medications, or completed adequate psychiatric evaluations at follow up visits to determine
14 whether the medications were safe, effective, and continued to be medically indicated.

15 24. As of November 21, 2022, Patient 1 had been diagnosed with severe recurrent major
16 depression with psychotic features, post-traumatic stress disorder, seizure disorder, atypical
17 dissociative disorder, and is status post multiple head traumas and memory loss.

18 25. Respondent's materials include no medical records prior to June 2022 establishing a
19 history of the patient's symptoms, documentation of objective findings of a psychiatric disorder, a
20 recorded assessment of the patient, and an adequate description of how the symptoms and
21 objective findings led to a particular diagnosis. The decision to prescribe the controlled
22 substances while in private practice does not appear to be based on an adequate history and
23 examination to establish an appropriate medical indication for their use.

24 26. Respondent's records for his care and treatment of Patient 1 from July 2022 forward
25 do not contain sufficient information about Patient 1's treatment to be considered complete and
26 adequate. They do not contain information about objective observations regarding mental status
27 examinations or physical examinations, and do not contain sufficient information about
28

1 Respondent's impressions to understand the medical decision-making process regarding the care
2 and treatment of Patient 1.

3 **Respondent's Federal Indictment**

4 27. On or about June 12, 2024, Respondent and a co-defendant were indicted for
5 Conspiracy to Distribute Controlled Substances in violation of 21 U.S.C. § 846; Distribution of
6 Controlled Substances in violation of 21 U.S.C. § 841(a) and (b)(1)(C), Conspiracy to Commit
7 Health Care Fraud in violation of 18 U.S.C. § 1349, Conspiracy to Obstruct Justice in violation of
8 18 U.S.C. § 1512(k), and Aiding and Abetting in violation of 18 U.S.C. § 2, in a federal criminal
9 proceeding entitled *United States v. Ruthia He and David Brody*, N.D. Cal. Case No. 3:24-cr-
10 00329-CRB, in the U.S. District Court for the Northern District of California. The circumstances
11 are as follows:

12 A. Okay Health, Inc. was allegedly a Delaware corporation incorporated on or
13 about February 26, 2020. In approximately April 2021, Respondent's co-defendant, the founder
14 of Okay Health, Inc., submitted a certificate of amendment of incorporation to rename the
15 corporation Done Global, Inc. (Done Global).

16 B. Done Health, P.C. (Done), a California corporation, was allegedly incorporated
17 on or about August 7, 2020, solely by Respondent, but his co-defendant owned, controlled, and
18 operated Done. Respondent was also allegedly the clinical president of Done, a self-proclaimed
19 "digital health company" operating on a subscription-based model, in which individuals paid a
20 monthly fee to Done to receive online diagnoses, treatment, and refills of medication for attention
21 deficit hyperactivity disorder (ADHD). Done allegedly had a network of physicians and nurses,
22 including Respondent, who Done paid to diagnose its subscribing members with ADHD and to
23 issue prescriptions for controlled substances. Since the beginning of the COVID-19 pandemic,
24 Done allegedly arranged for the prescription of over 40 million pills of Adderall and other
25 stimulants and obtained over \$100 million in revenue.

26 C. Through Done, Respondent and his co-defendant allegedly received payment
27 for signing prescriptions that were not for a legitimate medical purpose in the usual course of
28 professional practice between approximately February 2020 and January 2023. They also

1 allegedly made false representations to pharmacies about Done's prescription practices and
2 policies and submitted false and fraudulent claims to Medicare, Medicaid, and commercial
3 insurance companies. Pharmacies allegedly filled the prescriptions based on information received
4 from Done prescribers.

5 28. Respondent did not report this indictment to the Board, and there was no report made
6 on his behalf pertaining to the indictment.

7 **FIRST CAUSE FOR DISCIPLINE**

8 **(Unprofessional Conduct - Gross Negligence)**

9 29. Paragraphs 18 through 26 are incorporated by reference as if fully set forth.

10 30. Respondent is subject to disciplinary action under section 2234(b) of the Code, in that
11 Respondent was grossly negligent in the care and treatment of Patient 1. The circumstances are
12 as follows:

13 A. Respondent prescribed controlled substances without medical indication.

14 B. Respondent treated Patient 1's rheumatological conditions by prescribing
15 carisoprodol without taking an adequate examination and maintaining adequate records.

16 C. Respondent conducted an inadequate psychiatric evaluation and assessment of
17 Patient 1.

18 **SECOND CAUSE FOR DISCIPLINE**

19 **(Failure to Maintain Adequate and Accurate Records)**

20 31. Paragraphs 18 through 26 are incorporated by reference as if fully set forth.

21 32. Respondent is subject to disciplinary action under section 2266 of the Code, in that
22 Respondent failed to maintain adequate and accurate records of his treatment of Patient 1.

23 **THIRD CAUSE FOR DISCIPLINE**

24 **(Failure to Report Indictment within 30 Days)**

25 33. Paragraphs 27 through 28 are incorporated by reference as if fully set forth.

26 34. Respondent is subject to disciplinary action under section 802.1 of the Code, in that
27 Respondent was indicted on federal charges and did not report this indictment to the Board within
28 30 days.

1 PRAYER

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

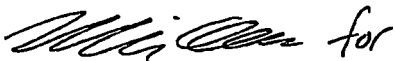
4 1. Revoking or suspending Physician's and Surgeon's Certificate Number G 56780,
5 issued to Respondent David Brody, M.D.;

6 2. Revoking, suspending or denying approval of Respondent David Brody, M.D.'s
7 authority to supervise physician assistants and advanced practice nurses;

8 3. Ordering Respondent David Brody, M.D., to pay the Board the costs of the
9 investigation and enforcement of this case, and if placed on probation, the costs of probation
10 monitoring; and

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

12
13 DATED: APR 07 2025


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

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