

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

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

**William Gowing Broad , M.D.**

**Physician's and Surgeon's  
Certificate No. G 67157**

**Respondent.**

**Case No.: 800-2018-050707**

**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 October 3, 2022.**

**IT IS SO ORDERED: September 1, 2022.**

**MEDICAL BOARD OF CALIFORNIA**



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

1 ROB BONTA  
Attorney General of California  
2 MARY CAIN-SIMON  
Supervising Deputy Attorney General  
3 GREG W. CHAMBERS  
Deputy Attorney General  
4 State Bar No. 237509  
455 Golden Gate Avenue, Suite 11000  
5 San Francisco, CA 94102-7004  
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6 Facsimile: (415) 703-5480  
*Attorneys for Complainant*  
7

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

12 In the Matter of the First Amended Accusation  
Against:

13 **WILLIAM GOWING BROAD, M.D.**  
14 **15425 Los Gatos Blvd, Ste. 101**  
15 **Los Gatos, CA 95032-2541**

16 **Physician's and Surgeon's Certificate No. G**  
**67157**

17 Respondent.

Case No. 800-2018-050707

OAH No. 2021110072

**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER**

18  
19 In the interest of a prompt and speedy settlement of this matter, consistent with the public  
20 interest and the responsibility of the Medical Board of California of the Department of Consumer  
21 Affairs, the parties hereby agree to the following Stipulated Settlement and Disciplinary Order  
22 which will be submitted to the Board for approval and adoption as the final disposition of the  
23 First Amended Accusation.

24 **PARTIES**

25 1. William Prasifka (Complainant) is the Executive Director of the Medical Board of  
26 California (Board). He brought this action solely in his official capacity and is represented in this  
27 matter by Rob Bonta, Attorney General of the State of California, by Greg W. Chambers, Deputy  
28 Attorney General.

1 2. Respondent William Gowing Broad, M.D. (Respondent) is represented in this  
2 proceeding by attorney Thomas E. Still, whose address is: 12901 Saratoga Avenue, Saratoga,  
3 California, 95070.

4 3. On or about October 2, 1989, the Board issued Physician's and Surgeon's Certificate  
5 No. G 67157 to Respondent. The Physician's and Surgeon's Certificate was in full force and  
6 effect at all times relevant to the charges brought in First Amended Accusation No. 800-2018-  
7 050707, and will expire on August 31, 2023, unless renewed.

8 **JURISDICTION**

9 4. Accusation No. 800-2018-050707 was filed before the Board. The Accusation and all  
10 other statutorily required documents were properly served on Respondent on June 18, 2021.  
11 Respondent timely filed his Notice of Defense contesting the Accusation. On March 3, 2022, the  
12 Board filed and served the First Amended Accusation.

13 5. A copy of First Amended Accusation No. 800-2018-050707 is attached as exhibit A  
14 and incorporated herein by reference.

15 **ADVISEMENT AND WAIVERS**

16 6. Respondent has carefully read, fully discussed with counsel, and understands the  
17 charges and allegations in First Amended Accusation No. 800-2018-050707. Respondent has  
18 also carefully read, fully discussed with his counsel, and understands the effects of this Stipulated  
19 Settlement and Disciplinary Order.

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

27 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
28 every right set forth above.

1 **CULPABILITY**

2 9. Respondent understands and agrees that the charges and allegations in First Amended  
3 Accusation No. 800-2018-050707, if proven at a hearing, constitute cause for imposing discipline  
4 upon his Physician's and Surgeon's Certificate.

5 10. Respondent agrees that, at a hearing, Complainant could establish a prima facie case  
6 or factual basis for the charges in the First Amended Accusation, and that Respondent hereby  
7 gives up his right to contest those charges.

8 11. Respondent agrees that if he ever petitions for early termination or modification of  
9 probation, or if the Board ever petitions for revocation of probation, all of the charges and  
10 allegations contained in First Amended Accusation No. 800-2018-050707, a true and correct copy  
11 of which is attached hereto as Exhibit A, shall be deemed true, correct, and fully admitted by  
12 Respondent for purposes of that proceeding or any other licensing proceeding involving  
13 Respondent in the State of California.

14 12. Respondent agrees that his Physician's and Surgeon's Certificate, No. G 67157, is  
15 subject to discipline and he agrees to be bound by the Board's probationary terms as set forth in  
16 the Disciplinary Order below.

17 **CONTINGENCY**

18 13. This stipulation shall be subject to approval by the Medical Board of California.  
19 Respondent understands and agrees that counsel for Complainant and the staff of the Medical  
20 Board of California may communicate directly with the Board regarding this stipulation and  
21 settlement, without notice to or participation by Respondent or his counsel. By signing the  
22 stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek  
23 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails  
24 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary  
25 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal  
26 action between the parties, and the Board shall not be disqualified from further action by having  
27 considered this matter.  
28

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

4           15.   In consideration of the foregoing admissions and stipulations, the parties agree that  
5 the Board may, without further notice or opportunity to be heard by the Respondent, issue and  
6 enter the following Disciplinary Order:

7   **DISCIPLINARY ORDER**

8           IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G 67157 issued  
9 to Respondent William Gowing Broad, M.D. is revoked. However, the revocations are stayed  
10 and Respondent is placed on probation for thirty-five (35) months on the following terms and  
11 conditions:

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

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

26           Respondent shall submit a certification of successful completion to the Board or its  
27 designee not later than 15 calendar days after successfully completing the course, or not later than  
28 15 calendar days after the effective date of the Decision, whichever is later.

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 enrollment. The medical  
8 record keeping course shall be at Respondent's expense and shall be in addition to the Continuing  
9 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 First Amended Accusation, but prior to the effective date of the Decision may, in the sole  
12 discretion of the Board or its designee, be accepted towards the fulfillment of this condition if the  
13 course would have been approved by the Board or its designee had the course been taken after the  
14 effective date of 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           3.    PROFESSIONALISM PROGRAM (ETHICS COURSE). Within 60 calendar days of  
19 the effective date of this Decision, Respondent shall enroll in a professionalism program, that  
20 meets the requirements of Title 16, California Code of Regulations (CCR) section 1358.1.  
21 Respondent shall participate in and successfully complete that program. Respondent shall  
22 provide any information and documents that the program may deem pertinent. Respondent shall  
23 successfully complete the classroom component of the program not later than six (6) months after  
24 Respondent's initial enrollment, and the longitudinal component of the program not later than the  
25 time specified by the program, but no later than one (1) year after attending the classroom  
26 component. The professionalism program shall be at Respondent's expense and shall be in  
27 addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

28           A professionalism program taken after the acts that gave rise to the charges in the First

1 Amended Accusation, but prior to the effective date of the Decision may, in the sole discretion of  
2 the Board or its designee, be accepted towards the fulfillment of this condition if the program  
3 would have been approved by the Board or its designee had the program been taken after the  
4 effective date of this Decision.

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

8 4. SUPERVISION OF PHYSICIAN ASSISTANTS AND ADVANCED PRACTICE  
9 NURSES. During probation, Respondent is prohibited from supervising physician assistants and  
10 advanced practice nurses.

11 5. OBEY ALL LAWS. Respondent shall obey all federal, state and local laws, all rules  
12 governing the practice of medicine in California and remain in full compliance with any court  
13 ordered criminal probation, payments, and other orders.

14 6. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby  
15 ordered to reimburse the Board its costs of investigation and enforcement, including, but not  
16 limited to, expert review, amended accusations, legal reviews, joint investigations, and subpoena  
17 enforcement, as applicable, in the amount of in the amount of \$ 2,860.00 (two thousand eight  
18 hundred and sixty dollars). Costs shall be payable to the Medical Board of California. Failure to  
19 pay such costs shall be considered a violation of probation.

20 Any and all requests for a payment plan shall be submitted in writing by Respondent to the  
21 Board.

22 The filing of bankruptcy by Respondent shall not relieve respondent of the responsibility to  
23 repay investigation and enforcement costs, including expert review costs.

24 7. QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations  
25 under penalty of perjury on forms provided by the Board, stating whether there has been  
26 compliance with all the conditions of probation.

27 Respondent shall submit quarterly declarations not later than 10 calendar days after the end  
28 of the preceding quarter.

1           8.    GENERAL PROBATION REQUIREMENTS.

2           Compliance with Probation Unit

3           Respondent shall comply with the Board's probation unit.

4           Address Changes

5           Respondent shall, at all times, keep the Board informed of Respondent's business and  
6 residence addresses, email address (if available), and telephone number. Changes of such  
7 addresses shall be immediately communicated in writing to the Board or its designee. Under no  
8 circumstances shall a post office box serve as an address of record, except as allowed by Business  
9 and Professions Code section 2021, subdivision (b).

10          Place of Practice

11          Respondent shall not engage in the practice of medicine in Respondent's or patient's place  
12 of residence, unless the patient resides in a skilled nursing facility or other similar licensed  
13 facility.

14          License Renewal

15          Respondent shall maintain a current and renewed California physician's and surgeon's  
16 license.

17          Travel or Residence Outside California

18          Respondent shall immediately inform the Board or its designee, in writing, of travel to any  
19 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than thirty  
20 (30) calendar days.

21          In the event Respondent should leave the State of California to reside or to practice  
22 Respondent shall notify the Board or its designee in writing 30 calendar days prior to the dates of  
23 departure and return.

24          9.    INTERVIEW WITH THE BOARD OR ITS DESIGNEE. Respondent shall be  
25 available in person upon request for interviews either at Respondent's place of business or at the  
26 probation unit office, with or without prior notice throughout the term of probation.

27          10. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or  
28 its designee in writing within 15 calendar days of any periods of non-practice lasting more than



1 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is  
2 defined as any period of time Respondent is not practicing medicine as defined in Business and  
3 Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month in direct  
4 patient care, clinical activity or teaching, or other activity as approved by the Board. If  
5 Respondent resides in California and is considered to be in non-practice, Respondent shall  
6 comply with all terms and conditions of probation. All time spent in an intensive training  
7 program which has been approved by the Board or its designee shall not be considered non-  
8 practice and does not relieve Respondent from complying with all the terms and conditions of  
9 probation. Practicing medicine in another state of the United States or Federal jurisdiction while  
10 on probation with the medical licensing authority of that state or jurisdiction shall not be  
11 considered non-practice. A Board-ordered suspension of practice shall not be considered as a  
12 period of non-practice.

13 In the event Respondent's period of non-practice while on probation exceeds 18 calendar  
14 months, Respondent shall successfully complete the Federation of State Medical Boards's Special  
15 Purpose Examination, or, at the Board's discretion, a clinical competence assessment program  
16 that meets the criteria of Condition 18 of the current version of the Board's "Manual of Model  
17 Disciplinary Orders and Disciplinary Guidelines" prior to resuming the practice of medicine.

18 Respondent's period of non-practice while on probation shall not exceed two (2) years.

19 Periods of non-practice will not apply to the reduction of the probationary term.

20 Periods of non-practice for a Respondent residing outside of California will relieve  
21 Respondent of the responsibility to comply with the probationary terms and conditions with the  
22 exception of this condition and the following terms and conditions of probation: Obey All Laws;  
23 General Probation Requirements; Quarterly Declarations; Abstain from the Use of Alcohol and/or  
24 Controlled Substances; and Biological Fluid Testing.

25 11. COMPLETION OF PROBATION. Respondent shall comply with all financial  
26 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the  
27 completion of probation. Upon successful completion of probation, Respondent's certificate shall  
28 be fully restored.

1           12. VIOLATION OF PROBATION. Failure to fully comply with any term or condition  
2 of probation is a violation of probation. If Respondent violates probation in any respect, the  
3 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and  
4 carry out the disciplinary order that was stayed. If an Accusation, or Petition to Revoke  
5 Probation, or an Interim Suspension Order is filed against Respondent during probation, the  
6 Board shall have continuing jurisdiction until the matter is final, and the period of probation shall  
7 be extended until the matter is final.

8           13. LICENSE SURRENDER. Following the effective date of this Decision, if  
9 Respondent ceases practicing due to retirement or health reasons or is otherwise unable to satisfy  
10 the terms and conditions of probation, Respondent may request to surrender his license. The  
11 Board reserves the right to evaluate Respondent's request and to exercise its discretion in  
12 determining whether or not to grant the request, or to take any other action deemed appropriate  
13 and reasonable under the circumstances. Upon formal acceptance of the surrender, Respondent  
14 shall within 15 calendar days deliver Respondent's wallet and wall certificate to the Board or its  
15 designee and Respondent shall no longer practice medicine. Respondent will no longer be subject  
16 to the terms and conditions of probation. If Respondent re-applies for a medical license, the  
17 application shall be treated as a petition for reinstatement of a revoked certificate.

18           14. PROBATION MONITORING COSTS. Respondent shall pay the costs associated  
19 with probation monitoring each and every year of probation, as designated by the Board, which  
20 may be adjusted on an annual basis. Such costs shall be payable to the Medical Board of  
21 California and delivered to the Board or its designee no later than January 31 of each calendar  
22 year.

23           15. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for  
24 a new license or certification, or petition for reinstatement of a license, by any other health care  
25 licensing action agency in the State of California, all of the charges and allegations contained in  
26 First Amended Accusation No. 800-2018-050707 shall be deemed to be true, correct, and  
27 admitted by Respondent for the purpose of any Statement of Issues or any other proceeding  
28 seeking to deny or restrict license.

ACCEPTANCE

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

DATED: 4/15/22 William G. Broad, M.D.  
WILLIAM GOWING BROAD, M.D.  
Respondent

I have read and fully discussed with Respondent William Gowing Broad, M.D. the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 4/18/2022 Thomas E. Still  
THOMAS E. STILL  
Attorney for Respondent

ENDORSEMENT

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

DATED: \_\_\_\_\_

Respectfully submitted,  
ROB BONTA  
Attorney General of California  
MARY CAIN-SIMON  
Supervising Deputy Attorney General

GREG W. CHAMBERS  
Deputy Attorney General  
Attorneys for Complainant

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**ACCEPTANCE**

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

DATED: \_\_\_\_\_  
WILLIAM GOWING BROAD, M.D.  
*Respondent*

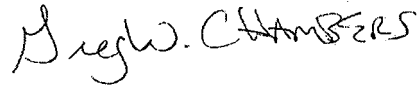
I have read and fully discussed with Respondent William Gowing Broad, M.D. the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: \_\_\_\_\_  
THOMAS E. STILL  
*Attorney for Respondent*

**ENDORSEMENT**

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

DATED: April 19, 2022

Respectfully submitted,  
ROB BONTA  
Attorney General of California  
MARY CAIN-SIMON  
Supervising Deputy Attorney General  
  
GREG W. CHAMBERS  
Deputy Attorney General  
*Attorneys for Complainant*

**Exhibit A**

**First Amended Accusation No. 800-2018-050707**

1 ROB BONTA  
Attorney General of California  
2 MARY CAIN-SIMON  
Supervising Deputy Attorney General  
3 GREG W. CHAMBERS  
Deputy Attorney General  
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*Attorneys for Complainant*

8 **BEFORE THE**  
9 **MEDICAL BOARD OF CALIFORNIA**  
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12 In the Matter of the First Amended Accusation  
Against:

Case No. 800-2018-050707

13 **WILLIAM GOWING BROAD, M.D.**  
14 **15949 Orange Blossom Lane**  
**Los Gatos, CA 95032-3538**

**FIRST AMENDED ACCUSATION**

15 **Physician's and Surgeon's Certificate**  
16 **No. G 67157,**

17 Respondent.

18  
19 **PARTIES**

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

23 2. On October 2, 1989, the Board issued Physician's and Surgeon's Certificate Number  
24 G 67157 to William Gowing Broad, M.D. (Respondent). The Physician's and Surgeon's  
25 Certificate was in full force and effect at all times relevant to the charges brought herein and will  
26 expire on August 31, 2021, unless renewed.

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**JURISDICTION**

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

5           4.     Section 2227 of the Business and Professions Code authorizes the Board to take  
6 action against a licensee by revoking, suspending for a period not to exceed one year, placing the  
7 license on probation and requiring payment of costs of probation monitoring, or taking such other  
8 action taken as the Board deems proper.

9           5.     Section 2234 of the Code, states:

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

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

15           “(b) Gross negligence.

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

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

21           “(2) When the standard of care requires a change in the diagnosis, act, or omission that  
22 constitutes the negligent act described in paragraph (1), including, but not limited to, a  
23 reevaluation of the diagnosis or a change in treatment, and the licensee’s conduct departs from the  
24 applicable standard of care, each departure constitutes a separate and distinct breach of the  
25 standard of care.

26           “(d) Incompetence.

27           “(e) The commission of any act involving dishonesty or corruption which is substantially  
28 related to the qualifications, functions, or duties of a physician and surgeon.





**PERTINENT DRUGS**

1  
2       12.   **Adderall**, a trade name for mixed salts of a single-entity amphetamine product  
3 (dextroamphetamine sulphate, dextroamphetamine saccharate, amphetamine sulfate,  
4 amphetamine aspartate), is a dangerous drug as defined in section 4022 and a schedule II  
5 controlled substance as defined by section 11055 of the Health and Safety Code. Adderall is  
6 indicated for Attention Deficit Disorder with Hyperactivity and Narcolepsy.

7       13.   **Amitriptyline** (Elavil) is a dangerous drug as defined in section 4022. It is an  
8 antidepressant with sedative effects. Lower dosages of amitriptyline are recommended for elderly  
9 patients. The manufacturer of Elavil suggests that for elderly patients, dosages as low as 10 mg 3  
10 times per day with one 20 mg dose at bedtime may be sufficient. The usual maintenance dose of  
11 amitriptyline HCl is 50 to 100 mg per day.

12       14.   **Carisoprodol**, also known by the trade name SOMA, is a muscle-relaxant and  
13 sedative. It is a dangerous drug as defined in section 4022 of the Business and Professions Code,  
14 and a Schedule IV controlled substance as defined by section 11057 of the Health and Safety  
15 Code. Since the effects of carisoprodol and alcohol or carisoprodol and other central nervous  
16 system depressants or psychotropic drugs may be addictive, appropriate caution should be  
17 exercised with patients who take more than one of these agents simultaneously.

18       15.   **Fentanyl** is an opioid analgesic. Fentanyl is a dangerous drug as defined in section  
19 4022 and a Schedule II controlled substance as defined by section 11055 of the Health and Safety  
20 Code. Fentanyl is a strong opioid medication and is indicated only for treatment of chronic pain  
21 (such as that of malignancy) that cannot be managed by lesser means and requires continuous  
22 opioid administration. Fentanyl presents a risk of serious or life-threatening hypoventilation.

23       16.   **Gabapentin**, known by the trade name Neurontin, is an antiepileptic and is indicated  
24 as adjunctive therapy in the treatment of partial seizures with and without secondary  
25 generalization in adults with epilepsy. It is a dangerous drug within the meaning of Business and  
26 Professions Code section 4022. The most commonly observed adverse events associated with the  
27 use of Neurontin in combination with other antiepileptic drugs were somnolence, dizziness,  
28 ataxia, fatigue, and nystagmus.

1           17.   **Hydrocodone bitartrate with acetaminophen**, also known by the trade name  
2 Norco, whose tablets contain 10 mg. of hydrocodone bitartrate and 350 mg. of acetaminophen.  
3 Acetaminophen is a non-opiate, non-salicylate analgesic and antipyretic. Hydrocodone bitartrate  
4 is semisynthetic narcotic analgesic and a dangerous drug as defined in section 4022 of the  
5 Business and Professions Code. Norco is a Schedule II controlled substance and narcotic as<sup>ated</sup>  
6 defined by section 11055, subdivision (e) of the Health and Safety Code. Repeated  
7 administration of hydrocodone over a course of several weeks may result in psychic and physical  
8 dependence.

9           18.   **Klonopin** is a trade name for clonazepam, an anticonvulsant of the benzodiazepine  
10 class of drugs. It is a dangerous drug as defined in section 4022 and a schedule IV controlled  
11 substance as defined by section 11057 of the Health and Safety Code. It produces central nervous  
12 system depression and should be used with caution with other central nervous system depressant  
13 drugs. Like other benzodiazapines, it can produce psychological and physical dependence.

14           19.   **Methadone hydrochloride** is a synthetic narcotic analgesic with multiple actions  
15 quantitatively similar to those of morphine. It also goes by the trade names Methadose and  
16 Dolophine. It is a dangerous drug as defined in section 4022 and a schedule II controlled  
17 substance and narcotic as defined by section 11055, subdivision (c) of the Health and Safety<sup>ated</sup>  
18 Code. Methadone can produce drug dependence of the morphine type and, therefore, has the  
19 potential for being abused. Psychic dependence, physical dependence, and tolerance may develop  
20 upon repeated administration of methadone, and it should be prescribed and administered with the  
21 same degree of caution appropriate to the use of morphine. Methadone should be used with  
22 caution and in reduced dosage in patients who are concurrently receiving other narcotic  
23 analgesics. The usual adult dosage is 2.5 mg. to 10 mg. every three to four hours as necessary for  
24 severe acute pain.

25           20.   **Morphine sulfate** is for use in patients who require a potent opioid analgesic for  
26 relief of moderate to severe pain. Morphine is a dangerous drug as defined in section 4022, a  
27 schedule II controlled substance and narcotic as defined by section 11055, subdivision (b)(1) of  
28

1 the Health and Safety Code. Morphine can produce drug dependence and has a potential for  
2 being abused.

3 21. **Naloxone hydrochloride**, known by the trade name Narcan, is a narcotic antagonist.  
4 It is a dangerous drug as defined in section 4022, indicated for complete or partial reversal of  
5 narcotic depression, including respiratory depression induced by opioids. The recommended  
6 initial adult dosage for partial reversal of postoperative narcotic depression is 0.1 to 0.2 mg.  
7 Narcan administered intravenously at two to three minute intervals to the desired degree of  
8 reversal. Larger than necessary dosages may result in significant reversal of analgesia and  
9 increase in blood pressure. Too rapid reversal may induce nausea, vomiting, sweating, or  
10 circulatory stress.

11 22. **Oxycodone** is a semisynthetic narcotic analgesic with multiple actions qualitatively  
12 similar to those of morphine. It is a dangerous drug as defined in section 4022 and a schedule II  
13 controlled substance and narcotic as defined by section 11055, subdivision (b)(1) of the Health  
14 and Safety Code. Oxycodone can produce drug dependence of the morphine type and, therefore,  
15 has the potential for being abused.

16 23. **Tramadol hydrochloride**, known by the trade name Ultram, is a centrally acting  
17 synthetic analgesic compound. It is a dangerous drug as defined in section 4022 of the Business  
18 and Professions Code, and a schedule II controlled substance as defined by section 11057 of the  
19 Health and Safety Code. Ultram is indicated for the management of moderate to moderately  
20 severe pain.

21 **FIRST CAUSE FOR DISCIPLINE**

22 **(Unprofessional Conduct: Gross Negligence; Repeated Negligent Acts; Prescribing Without  
23 Conducting Thorough Examination; Failure to Maintain Accurate and Adequate Records –  
Patient 1)**

24 24. Respondent William Gowing Broad, M.D. is subject to disciplinary action under  
25 section 2234(b) [gross negligence], and/or 2234(c) [repeated negligent acts], and/or 2242  
26 [furnishing dangerous drugs without examination] for unprofessional conduct, and 2266  
27 [inadequate medical records], in that the care and treatment of Patient 1 included departures from  
28 the standard of care constituting gross negligence, and or repeated negligent acts, in conjunction

1 with the other departures alleged herein, and failure to maintain accurate and adequate medical  
2 records. The circumstances are as follows:

3 25. Patient 1 was a 76-year-old female who first started treating with Respondent in 2015,  
4 after Respondent's partner – Patient 1's prior treatment provider – retired. Patient 1 had a history  
5 of bipolar illness, arthritis and COPD<sup>1</sup> and reportedly had a medical history including as many as  
6 18 surgical procedures. Patient 1 was treated by a pain management specialist who discontinued  
7 prescribing controlled substances, so Respondent continued prescribing pain medicines to Patient  
8 1 to maintain continuity, meeting with Patient 1 every two to three months until August 17, 2017.

9 26. From January 4, 2017 through October 23, 2017, Respondent appears to have  
10 prescribed the following to Patient 1 on a monthly basis: 100 mcg./hr. patch fentanyl #10; 325  
11 mg./10 mg. Norco #120; and 350 mg. carisoprodol # 100.

12 27. After an August 17, 2017 visit, Patient 1 contacted Respondent by phone twice in  
13 October 2017. Respondent appears to have prescribed Patient 1 the following on October 28,  
14 2017, without a face to face visit: 100 mcg./hr. patch fentanyl #10; 325 mg./10 mg. Norco #120;  
15 and 350 mg. carisoprodol # 100.

16 28. Respondent's records fail to document Patient 1's response to treatment and impact  
17 on her activities of daily living; fail to evidence a discussion of the risks and benefits of continued  
18 opiate use; fail to document periodic review or consideration of tapering of medications; fail to  
19 document consultations with pain management specialists in light of the high MME<sup>2</sup> for the  
20 prescribed medications; and contain only scant telephone notes indicating refills, without  
21 indication of serial examination or evaluation.

22 **SECOND CAUSE FOR DISCIPLINE**

23 **(Unprofessional Conduct: Gross Negligence; Repeated Negligent Acts; Failure to Maintain  
24 Accurate and Adequate Records – Patient 2)**

25 29. Respondent William Gowing Broad, M.D. is subject to disciplinary action under  
26 section 2234(b) [gross negligence], and/or 2234(c) [repeated negligent acts], and 2266  
27 [inadequate medical records], in that the care and treatment of Patient 2 included departures from

28 <sup>1</sup> Chronic Obstructive Pulmonary Disease.

<sup>2</sup> Morphine milligram equivalents.

1 the standard of care constituting gross negligence, and or repeated negligent acts, in conjunction  
2 with the other departures alleged herein, and failure to maintain accurate and adequate medical  
3 records. The circumstances are as follows:

4 30. Patient 2, a 65-year-old male, commenced treatment with Respondent in 2006.  
5 Patient 2 had a long history of bilateral knee osteoarthritis and annually saw a pain management  
6 specialist. Respondent reportedly prescribed on behalf of the pain management physician, who  
7 was out of network. Respondent prescribed Klonopin, morphine sulfate, oxycodone, tramadol  
8 and Adderall.

9 31. There was no evidence in the records that the risks and benefits of continued use of  
10 opiates was discussed with Patient 2. Additionally, there is no documentation of consultations  
11 between the Respondent and the pain management specialist, or request for copies of medical  
12 records, even though there was high MME prescribing of stimulants and opiates

13 32. Respondent failed to keep adequate and accurate records that documented whether  
14 informed consent was obtained or whether there were recommendations from the pain  
15 management specialist.

16 **THIRD CAUSE FOR DISCIPLINE**

17 **((Unprofessional Conduct: Gross Negligence; Repeated Negligent Acts; Excessive  
18 Prescribing; Failure to Maintain Accurate and Adequate Records – Patient 3))**

19 33. Respondent William Gowing Broad, M.D. is subject to disciplinary action under  
20 section 2234(b) [gross negligence], and/or 2234(c) [repeated negligent acts], and/or 725  
21 [excessive prescribing] for unprofessional conduct, and 2266 [inadequate medical records], in that  
22 the care and treatment of Patient 3 included departures from the standard of care constituting  
23 gross negligence, and or repeated negligent acts, in conjunction with the other departures alleged  
24 herein, and failure to maintain accurate and adequate medical records. The circumstances are as  
25 follows:

26 34. Patient 3, a 69-year-old male, commenced treatment with Respondent 2006 and  
27 underwent back surgery in 2009. At that time, Patient 3 received medications including  
28 methadone, amitriptyline, and gabapentin.

1 35. From January 12, 2017 until June 26, 2017, Patient 3 was receiving prescriptions  
2 from Respondent for 10 mg. methadone #450 approximately every thirty days. From July 21,  
3 2017 until January 12, 2018, Patient 3 was receiving prescriptions from Respondent for 10 mg.  
4 methadone #540 approximately every thirty days. From February 9, 2018 until April 27, 2020,  
5 Patient 3 was receiving prescriptions from Respondent for 10 mg. methadone #570 approximately  
6 every thirty days.

7 36. Respondent did not have a treatment plan or objective identified in Patient 3's  
8 medical records, nor was there any indication that Patient 3 was counseled regarding the risk of  
9 overdose and the use of naloxone, nor indication whether Respondent considered tapering Patient  
10 3's opiate use or refer Patient 3 to a pain management specialist in light of the high MME.

11 37. Respondent failed to keep adequate and accurate records that documented whether  
12 periodic review of treatment and objectives occurred and whether pain management consultations  
13 were considered.

14 **PRAYER**

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

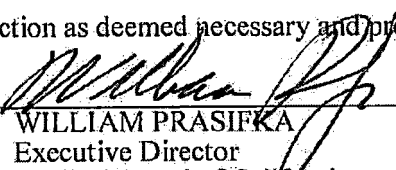
17 1. Revoking or suspending Physician's and Surgeon's Certificate Number G 67157,  
18 issued to Respondent William Gowing Broad, M.D.;

19 2. Revoking, suspending or denying approval of Respondent William Gowing Broad,  
20 M.D.'s authority to supervise physician assistants and advanced practice nurses;

21 3. Ordering Respondent William Gowing Broad, M.D., to pay the Board the costs of the  
22 investigation and enforcement of this case, and if placed on probation, the costs of probation  
23 monitoring; and

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

25 DATED: MAR 03 2022

  
\_\_\_\_\_  
WILLIAM PRASIFKA  
Executive Director  
Medical Board of California  
Department of Consumer Affairs  
State of California  
*Complainant*