

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

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

Ian Dallas Brodie, M.D.

**Physician's and Surgeon's
Certificate No. A 29773**

Case No. 800-2023-097589

Respondent.

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 January 15, 2024.

IT IS SO ORDERED January 8, 2024.

MEDICAL BOARD OF CALIFORNIA

Jenna Jones For
Reji Varghese
Executive Director

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

13 In the Matter of the Accusation Against:

Case No. 800-2023-097589

14 **IAN DALLAS BRODIE, M.D.**
15 **911 Electric Ave.**
Seal Beach, CA 90740-0665

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

16 **Physician's and Surgeon's Certificate No. A**
17 **29773,**

Respondent.

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

22 **PARTIES**

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

27 2. Ian Dallas Brodie, M.D. (Respondent) is representing himself in this proceeding and
28 has chosen not to exercise his right to be represented by counsel.

3. On or about December 8, 1975, the Board issued Physician's and Surgeon's Certificate No. A 29773 to Respondent. That license was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2023-097589 and will expire on April 30, 2024, unless renewed.

4. On or about November 15, 2023, an Interim Suspension Order was issued pursuant to Government Code section 11529 which suspended Respondent's ability to practice medicine. On or about December 5, 2023, the Interim Suspension Order was upheld pending a final resolution of Accusation No. 800-2023-097589 pending before the Board. The Interim Suspension Order remains in full force and effect as of the effective date of this Stipulated Surrender and Order.

JURISDICTION

5. On December 19, 2023, Accusation No. 800-2023-097589 was filed before the Board, and is currently pending against Respondent. On December 19, 2023, a true and correct copy of Accusation No. 800-2023-097589 and all other statutorily required documents were properly served on Respondent. A true and correct copy of Accusation No. 800-2023-097589 is attached hereto as Exhibit A and incorporated by reference as if fully set forth herein.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, and fully understands the charges and allegations in Accusation No. 800-2023-097589. Respondent also has carefully read, and fully understands the effects of this Stipulated Surrender of License and Order.

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

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

1 **CULPABILITY**

2 9. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. 800-2023-097589, agrees that cause for action exists and hereby surrenders his Physician's
4 and Surgeon's Certificate No. A 29773 for the Board's formal acceptance.

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

8 **CONTINGENCY**

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

12 12. Respondent understands that, by signing this stipulation, he enables the Executive
13 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his
14 Physician's and Surgeon's Certificate No. A 29773 without further notice to, or opportunity to be
15 heard by, Respondent.

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

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

27 Respondent fully understands and agrees that in deciding whether or not to approve and adopt this
28 Stipulated Surrender of License and Order, the Executive Director and/or the Board may receive

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

13 ADDITIONAL PROVISIONS

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

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

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

23 ORDER

24 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 29773, issued
25 to Respondent Ian Dallas Brodie, M.D., is hereby surrendered and accepted by the Board.

26 1. This stipulation shall become a part of Respondent's license history with the Medical
27 Board of California.

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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: January 4, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California
MATTHEW M. DAVIS
Supervising Deputy Attorney General



LEANNA E. SHIELDS
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 800-2023-097589

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STATE OF CALIFORNIA

13 In the Matter of the Accusation Against:

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14 **IAN DALLAS BRODIE, M.D.**
15 **911 Electric Ave.**
Seal Beach, CA 90740-0665

A C C U S A T I O N

16 **Physician's and Surgeon's Certificate**
17 **No. A 29773,**

Respondent.

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20 Complainant alleges:

21 **PARTIES**

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

25 2. On or about December 8, 1975, the Medical Board issued Physician's and Surgeon's
26 Certificate No. A 29773 to Ian Dallas Brodie, M.D. (Respondent). The Physician's and
27 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
28 herein and will expire on April 30, 2024, unless renewed.

1 3. On or about November 15, 2023, an *ex parte* interim order of suspension was
2 imposed restricting Respondent from practicing medicine.

3 4. On or about December 5, 2023, the interim order of suspension was upheld pending a
4 final resolution of the instant matter pending before the Board.

5 **JURISDICTION**

6 5. This Accusation is brought before the Board, under the authority of the following
7 laws. All section references are to the Business and Professions Code (Code) unless otherwise
8 indicated.

9 6. Section 820 of the Code states:

10 Whenever it appears that any person holding a license, certificate or permit
11 under this division or under any initiative act referred to in this division may be
12 unable to practice his or her profession safely because the licentiate's ability to
13 practice is impaired due to mental illness, or physical illness affecting competency,
14 the licensing agency may order the licentiate to be examined by one or more
15 physicians and surgeons or psychologists designated by the agency. The report of the
16 examiners shall be made available to the licentiate and may be received as direct
17 evidence in proceedings conducted pursuant to Section 822.

18 7. Section 822 of the Code states:

19 If a licensing agency determines that its licentiate's ability to practice his or her
20 profession safely is impaired because the licentiate is mentally ill, or physically ill
21 affecting competency, the licensing agency may take action by any one of the
22 following methods:

23 (a) Revoking the licentiate's certificate or license.

24 (b) Suspending the licentiate's right to practice.

25 (c) Placing the licentiate on probation.

26 (d) Taking such other action in relation to the licentiate as the licensing agency
27 in its discretion deems proper.

28 The licensing section shall not reinstate a revoked or suspended certificate or
license until it has received competent evidence of the absence or control of the
condition which caused its action and until it is satisfied that with due regard for the
public health and safety the person's right to practice his or her profession may be
safely reinstated.

 8. Section 2220 of the Code states, in pertinent part, "Except as otherwise provided by
law, the board may take action against all persons guilty of violating this chapter. The board shall
enforce and administer this article as to physician and surgeon certificate holders..."

CAUSE FOR ACTION

(Mental and/or Physical Condition Affecting Competency)

9. Respondent's Physician's and Surgeon's Certificate No. A 29773 is subject to action under section 822 of the Code, in that his ability to practice medicine safely is impaired due to a mental and/or physical condition affecting competency, as more particularly alleged hereinafter.

10. On or about July 13, 2023, Respondent agreed to undergo a voluntary mental and physical evaluation by Board appointed physicians.

11. On or about August 31, 2023, a Board appointed physician (Dr. F.H.) performed a face-to-face evaluation of Respondent. During his evaluation, Dr. F.H. noted Respondent had difficulty hearing even with the use of his hearing aids. Respondent required Dr. F.H. to repeat his questions multiple times, and even then, Respondent's understanding of the questions were often in error. Respondent indicated he saw a hearing doctor every six weeks, but was unable to recall the name of this doctor. When asked about his medications, Respondent could only recall his pain medication and blood pressure medication. Respondent indicated he had a bag full of bottles of medications that were nearly empty, but could not recall what these medications were.

12. Based upon his evaluation of Respondent, Dr. F.H. concluded Respondent suffered from memory impairment, severe hearing loss, and cognitive impairment, rendering Respondent unable to practice medicine safely.

13. On or about September 28, 2023, a Board appointed psychiatrist (Dr. A.S.) performed a face-to-face evaluation of Respondent. During his evaluation, Dr. A.S. administered several tests, including, but not limited to, the Millon Clinical Multiaxial Inventory-III (MCMI-III), a Mental Status Exam (MSE), and a Rey 15-Item Memorization Test (RMT). On the RMT, Respondent could only recall 4 out of the 15 items, indicative of severe cognitive challenges. On the MCMI-III, Respondent required repeated instructions regarding how to answer simple True/False questions and needed Dr. A.S. to write on a board "T" for True, and "F" for False to complete the evaluation. On the MSE, Respondent scored 22 out of 30 indicative of cognitive impairment. Throughout Dr. A.S.'s evaluation, Respondent struggled to hear instructions and questions and required the instructions and questions to be repeated numerous times.

14. Based upon his evaluation of Respondent, Dr. A.S. concluded Respondent suffers from major neurocognitive disorder, unspecified, and as a result, is unable to practice medicine safely.

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. A 29773, issued to Respondent Ian Dallas Brodie, M.D.;
2. Revoking, suspending or denying approval of Respondent Ian Dallas Brodie, M.D.'s authority to supervise physician assistants and advanced practice nurses;
3. Ordering Respondent Ian Dallas Brodie, M.D., to pay the Board the costs of probation monitoring, if placed on probation; and
4. Taking such other and further action as deemed necessary and proper.

DATED: DEC 19 2023


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

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