

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

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

Gisoo Zarrabi, M.D.

**Physician's and Surgeon's
Certificate No. A 117990**

Case No.: 800-2022-091554

Respondent.

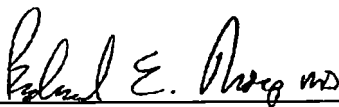
DECISION

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 May 30, 2025.

IT IS SO ORDERED: May 2, 2025.

MEDICAL BOARD OF CALIFORNIA



**Richard E. Thorp, Chair
Panel B**

1 ROB BONTA
Attorney General of California
2 MATTHEW M. DAVIS
Supervising Deputy Attorney General
3 NICOLE NOONAN-MILLER
Deputy Attorney General
4 State Bar No. 276951
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9041
7 Facsimile: (619) 645-2061

8 *Attorneys for Complainant*

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. 800-2022-091554

14 **GISOO ZARRABI, M.D.**
2760 Park Avenue
15 Laguna Beach, CA 92651-2034

OAH No. 2024101138

16 **Physician's and Surgeon's Certificate No. A**
17 **117990,**

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

18 Respondent.

19
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 Nicole Noonan-Miller,
26 Deputy Attorney General.

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2. Respondent Gisoo Zarrabi, M.D. (Respondent) is represented in this proceeding by attorney Scott J. Harris, Esq., whose address is: 280 S. Beverly Drive, Suite 209, Beverly Hills, CA 90212.

3. On or about August 10, 2011, the Board issued Physician's and Surgeon's Certificate No. A 117990 to Respondent. The Physician's and Surgeon's Certificate will expire on May 31, 2025, unless renewed.

JURISDICTION

4. On or about February 20, 2024, Accusation No. 800-2022-091554 was filed before the Board and is currently pending against Respondent. On or about February 20, 2024, a true and correct copy of the Accusation and all other statutorily required documents were properly served on Respondent. Respondent timely filed her Notice of Defense contesting the Accusation.

5. A true and correct copy of Accusation No. 800-2022-091554 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and fully understands the charges and allegations in Accusation No. 800-2022-091554. Respondent has also carefully read, fully discussed with her counsel, and fully understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her 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. Having the benefit of counsel, Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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1 **CULPABILITY**

2 9. Respondent does not contest that, at an administrative hearing, Complainant could
3 establish a *prima facie* case with respect to each and every charge and allegation contained in
4 Accusation No. 800-2022-091554, and that she has thereby subjected her Physician's and
5 Surgeon's Certificate No. A 117990 to disciplinary action.

6 10. Respondent further agrees that if she ever petitions for early termination or
7 modification of probation, or if an accusation and/or petition to revoke probation is filed against
8 her before the Board, all of the charges and allegations contained in Accusation No. 800-2022-
9 091554 shall be deemed true, correct, and fully admitted by Respondent for purposes of any such
10 proceeding or any other licensing proceeding involving Respondent in the State of California.

11 11. Respondent agrees that her Physician's and Surgeon's Certificate No. A 117990 is
12 subject to discipline and agrees to be bound by the Board's probationary terms as set forth in the
13 Disciplinary Order below.

14 **CONTINGENCY**

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

25 13. This Stipulated Settlement and Disciplinary Order is intended by the parties herein to
26 be an integrated writing representing the complete, final and exclusive embodiment of the
27 agreement of the parties in this above-entitled matter.

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

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

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 117990 issued to Respondent Gisoo Zarrabi, M.D., is hereby revoked. However, the revocation is stayed, and Respondent is placed on probation for five (5) years on the following terms and conditions:

1. PROFESSIONALISM PROGRAM (ETHICS COURSE). Within 60 calendar days of the effective date of this Decision, Respondent shall enroll in a professionalism program, that meets the requirements of Title 16, California Code of Regulations (CCR) section 1358.1. Respondent shall participate in and successfully complete that program. Respondent shall provide any information and documents that the program may deem pertinent. Respondent shall successfully complete the classroom component of the program not later than six (6) months after Respondent's initial enrollment, and the longitudinal component of the program not later than the time specified by the program, but no later than one (1) year after attending the classroom component. The professionalism program shall be at Respondent's expense and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

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

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

1 2. PSYCHIATRIC EVALUATION. Within 30 calendar days of the effective date of
2 this Decision, and on whatever periodic basis thereafter may be required by the Board or its
3 designee, Respondent shall undergo and complete a psychiatric evaluation (and psychological
4 testing, if deemed necessary) by a Board-appointed board certified psychiatrist, who shall
5 consider any information provided by the Board or designee and any other information the
6 psychiatrist deems relevant, and shall furnish a written evaluation report to the Board or its
7 designee. Psychiatric evaluations conducted prior to the effective date of the Decision shall not
8 be accepted towards the fulfillment of this requirement. Respondent shall pay the cost of all
9 psychiatric evaluations and psychological testing.

10 Respondent shall comply with all restrictions or conditions recommended by the evaluating
11 psychiatrist within 15 calendar days after being notified by the Board or its designee.

12 Respondent shall not engage in the practice of medicine until notified by the Board or its
13 designee that Respondent is mentally fit to practice medicine safely. The period of time that
14 Respondent is not practicing medicine shall not be counted toward completion of the term of
15 probation.

16 3. PSYCHOTHERAPY. Within 60 calendar days of the effective date of this Decision,
17 Respondent shall submit to the Board or its designee for prior approval the name and
18 qualifications of a California-licensed board-certified psychiatrist or a licensed psychologist who
19 has a doctoral degree in psychology and at least five years of postgraduate experience in the
20 diagnosis and treatment of emotional and mental disorders. Upon approval, Respondent shall
21 undergo and continue psychotherapy treatment, including any modifications to the frequency of
22 psychotherapy, until the Board or its designee deems that no further psychotherapy is necessary.

23 The psychotherapist shall consider any information provided by the Board or its designee
24 and any other information the psychotherapist deems relevant and shall furnish a written
25 evaluation report to the Board or its designee. Respondent shall cooperate in providing the
26 psychotherapist with any information and documents that the psychotherapist may deem
27 pertinent.

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1 Respondent shall have the treating psychotherapist submit quarterly status reports to the
2 Board or its designee. The Board or its designee may require Respondent to undergo psychiatric
3 evaluations by a Board-appointed board-certified psychiatrist. If, prior to the completion of
4 probation, Respondent is found to be mentally unfit to resume the practice of medicine without
5 restrictions, the Board shall retain continuing jurisdiction over Respondent's license and the
6 period of probation shall be extended until the Board determines that Respondent is mentally fit
7 to resume the practice of medicine without restrictions.

8 Respondent shall pay the cost of all psychotherapy and psychiatric evaluations.

9 4. MEDICAL EVALUATION AND TREATMENT. Within 30 calendar days of the
10 effective date of this Decision, and on a periodic basis thereafter as may be required by the Board
11 or its designee, Respondent shall undergo a medical evaluation by a Board-appointed physician
12 who shall consider any information provided by the Board or designee and any other information
13 the evaluating physician deems relevant and shall furnish a medical report to the Board or its
14 designee. Respondent shall provide the evaluating physician with any information and
15 documentation that the evaluating physician may deem pertinent.

16 Following the evaluation, Respondent shall comply with all restrictions or conditions
17 recommended by the evaluating physician within 15 calendar days after being notified by the
18 Board or its designee. If Respondent is required by the Board or its designee to undergo medical
19 treatment, Respondent shall within 30 calendar days of the requirement notice, submit to the
20 Board or its designee for prior approval the name and qualifications of a California licensed
21 treating physician of Respondent's choice. Upon approval of the treating physician, Respondent
22 shall within 15 calendar days undertake medical treatment and shall continue such treatment until
23 further notice from the Board or its designee.

24 The treating physician shall consider any information provided by the Board or its designee
25 or any other information the treating physician may deem pertinent prior to commencement of
26 treatment. Respondent shall have the treating physician submit quarterly reports to the Board or
27 its designee indicating whether or not the Respondent is capable of practicing medicine safely.

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1 Respondent shall provide the Board or its designee with any and all medical records pertaining to
2 treatment that the Board or its designee deems necessary.

3 If, prior to the completion of probation, Respondent is found to be physically incapable of
4 resuming the practice of medicine without restrictions, the Board shall retain continuing
5 jurisdiction over Respondent's license and the period of probation shall be extended until the
6 Board determines that Respondent is physically capable of resuming the practice of medicine
7 without restrictions. Respondent shall pay the cost of the medical evaluation(s) and treatment.

8 Respondent shall not engage in the practice of medicine until notified in writing by the
9 Board or its designee of its determination that Respondent is medically fit to practice safely.

10 5. PRACTICE MONITOR. Within 30 calendar days of the effective date of this
11 Decision, Respondent shall submit to the Board or its designee for prior approval as a practice
12 monitor, the name and qualifications of one or more licensed physicians and surgeons whose
13 licenses are valid and in good standing, and who are preferably American Board of Medical
14 Specialties (ABMS) certified. A monitor shall have no prior or current business or personal
15 relationship with Respondent, or other relationship that could reasonably be expected to
16 compromise the ability of the monitor to render fair and unbiased reports to the Board, including
17 but not limited to any form of bartering, shall be in Respondent's field of practice, and must agree
18 to serve as Respondent's monitor. Respondent shall pay all monitoring costs.

19 The Board or its designee shall provide the approved monitor with copies of the Decision(s)
20 and Accusation(s), and a proposed monitoring plan. Within 15 calendar days of receipt of the
21 Decision(s), Accusation(s), and proposed monitoring plan, the monitor shall submit a signed
22 statement that the monitor has read the Decision(s) and Accusation(s), fully understands the role
23 of a monitor, and agrees or disagrees with the proposed monitoring plan. If the monitor disagrees
24 with the proposed monitoring plan, the monitor shall submit a revised monitoring plan with the
25 signed statement for approval by the Board or its designee.

26 Within 60 calendar days of the effective date of this Decision, and continuing throughout
27 probation, Respondent's practice shall be monitored by the approved monitor. Respondent shall

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1 make all records available for immediate inspection and copying on the premises by the monitor
2 at all times during business hours and shall retain the records for the entire term of probation.

3 If Respondent fails to obtain approval of a monitor within 60 calendar days of the effective
4 date of this Decision, Respondent shall receive a notification from the Board or its designee to
5 cease the practice of medicine within three (3) calendar days after being so notified. Respondent
6 shall cease the practice of medicine until a monitor is approved to provide monitoring
7 responsibility.

8 The monitor(s) shall submit a quarterly written report to the Board or its designee which
9 includes an evaluation of Respondent's performance, indicating whether Respondent's practices
10 are within the standards of practice of medicine, and whether Respondent is practicing medicine
11 safely, billing appropriately or both. It shall be the sole responsibility of Respondent to ensure
12 that the monitor submits the quarterly written reports to the Board or its designee within 10
13 calendar days after the end of the preceding quarter.

14 If the monitor resigns or is no longer available, Respondent shall, within 5 calendar days of
15 such resignation or unavailability, submit to the Board or its designee, for prior approval, the
16 name and qualifications of a replacement monitor who will be assuming that responsibility within
17 15 calendar days. If Respondent fails to obtain approval of a replacement monitor within 60
18 calendar days of the resignation or unavailability of the monitor, Respondent shall receive a
19 notification from the Board or its designee to cease the practice of medicine within three (3)
20 calendar days after being so notified. Respondent shall cease the practice of medicine until a
21 replacement monitor is approved and assumes monitoring responsibility.

22 In lieu of a monitor, Respondent may participate in a professional enhancement program
23 approved in advance by the Board or its designee that includes, at minimum, quarterly chart
24 review, semi-annual practice assessment, and semi-annual review of professional growth and
25 education. Respondent shall participate in the professional enhancement program at Respondent's
26 expense during the term of probation.

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1 6. NOTIFICATION. Within seven (7) days of the effective date of this Decision, the
2 Respondent shall provide a true copy of this Decision and Accusation to the Chief of Staff or the
3 Chief Executive Officer at every hospital where privileges or membership are extended to
4 Respondent, at any other facility where Respondent engages in the practice of medicine,
5 including all physician and locum tenens registries or other similar agencies, and to the Chief
6 Executive Officer at every insurance carrier which extends malpractice insurance coverage to
7 Respondent. Respondent shall submit proof of compliance to the Board or its designee within 15
8 calendar days.

9 This condition shall apply to any change(s) in hospitals, other facilities or insurance carrier.

10 7. SUPERVISION OF PHYSICIAN ASSISTANTS AND ADVANCED PRACTICE
11 NURSES. During probation, Respondent is prohibited from directly supervising physician
12 assistants and advanced practice nurses. Respondent's ownership of her current medical practice
13 and consultation with practitioners at this practice does not constitute supervision of physician
14 assistants and advance practice nurses.

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

18 9. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby
19 ordered to reimburse the Board its costs of investigation and enforcement, including, but not
20 limited to, expert review, legal reviews, and investigation(s), as applicable, in the amount of
21 \$45,128.00. Costs shall be payable to the Medical Board of California. Failure to pay such costs
22 shall be considered a violation of probation.

23 Payment must be made in full within 30 calendar days of the effective date of the Order, or
24 by a payment plan approved by the Medical Board of California. Any and all requests for a
25 payment plan shall be submitted in writing by respondent to the Board. Failure to comply with
26 the payment plan shall be considered a violation of probation.

27 The filing of bankruptcy by Respondent shall not relieve Respondent of the responsibility
28 to repay investigation and enforcement costs.

1 10. QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations
2 under penalty of perjury on forms provided by the Board, stating whether there has been
3 compliance with all the conditions of probation. Respondent shall submit quarterly declarations
4 not later than 10 calendar days after the end of the preceding quarter.

5 11. GENERAL PROBATION REQUIREMENTS.

6 Compliance with Probation Unit

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

8 Address Changes

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

14 Place of Practice

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

18 License Renewal

19 Respondent shall maintain a current and renewed California physician's and surgeon's
20 license.

21 Travel or Residence Outside California

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

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

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

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

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

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

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

25 Periods of non-practice for a Respondent residing outside of California will relieve
26 Respondent of the responsibility to comply with the probationary terms and conditions with the
27 exception of this condition and the following terms and conditions of probation: Obey All Laws;
28 General Probation Requirements; and Quarterly Declarations.

1 14. COMPLETION OF PROBATION. Respondent shall comply with all financial
2 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
3 completion of probation. This term does not include cost recovery, which is due within 30
4 calendar days of the effective date of the Order, or by a payment plan approved by the Medical
5 Board and timely satisfied. Upon successful completion of probation, Respondent's certificate
6 shall be fully restored.

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

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

24 17. PROBATION MONITORING COSTS. Respondent shall pay the costs associated
25 with probation monitoring each and every year of probation, as designated by the Board, which
26 may be adjusted on an annual basis. Such costs shall be payable to the Medical Board of
27 California and delivered to the Board or its designee no later than January 31 of each calendar
28 year.

1 18. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for
2 a new license or certification, or petition for reinstatement of a license, by any other health care
3 licensing action agency in the State of California, all of the charges and allegations contained in
4 Accusation No. 800-2022-091554 shall be deemed to be true, correct, and fully admitted by
5 Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or
6 restrict license.

7 ACCEPTANCE

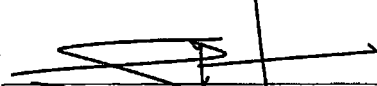
8 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
9 discussed it with my attorney, Scott J. Harris, Esq. I fully understand the stipulation and the
10 effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated
11 Settlement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

13
14 DATED: 3/06/2025


15 GISOO ZARRABI, M.D.
Respondent

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

19
20 DATED: March 6, 2025


21 SCOTT J. HARRIS, ESQ.
Attorney for Respondent

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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: March 6, 2025

Respectfully submitted,

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


for
NICOLE NOONAN-MILLER
Deputy Attorney General
Attorneys for Complainant

SD2023802868/84997035

Exhibit A

Accusation No. 800-2022-091554

1 ROB BONTA
Attorney General of California
2 MATTHEW M. DAVIS
Supervising Deputy Attorney General
3 NICOLE NOONAN-MILLER
Deputy Attorney General
4 State Bar No. 276951
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9041
7 Facsimile: (619) 645-2061

8 *Attorneys for Complainant*

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. 800-2022-091554

14 **GISOO ZARRABI, M.D.**
2760 Park Ave
15 Laguna Beach, CA 92651-2034

A C C U S A T I O N

17 **Physician's and Surgeon's Certificate**
18 **No. A 117990,**
Respondent.

19
20 **PARTIES**

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

24 2. On or about August 10, 2011, the Medical Board issued Physician's and Surgeon's
25 Certificate No. A 117990 to Gisoo Zarrabi, M.D. (Respondent). The Physician's and Surgeon's
26 Certificate expires on May 31, 2025, unless renewed.

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1 **JURISDICTION**

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:

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
into a stipulation for disciplinary action with the board, may, in accordance with the
provisions of this chapter:

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

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

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

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

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

17 (b) Any matter heard pursuant to subdivision (a), except for warning letters,
18 medical review or advisory conferences, professional competency examinations,
19 continuing education activities, and cost reimbursement associated therewith that are
agreed to with the board and successfully completed by the licensee, or other matters
made confidential or privileged by existing law, is deemed public, and shall be made
available to the public by the board pursuant to Section 803.1.

20 5. Section 2234 of the Code, states:

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

23 ...

24 6. Section 118 of the Code states in pertinent part:

25 ...

26 (b) The suspension, expiration, or forfeiture by operation of law of a license
27 issued by a board in the department, or its suspension, forfeiture, or cancellation by
order of the board or by order of a court of law, or its surrender without the written
28 consent of the board, shall not, during any period in which it may be renewed,
restored, reissued, or reinstated, deprive the board of its authority to institute or

1 continue a disciplinary proceeding against the licensee upon any ground provided by
2 law or to enter an order suspending or revoking the license or otherwise taking
disciplinary action against the licensee on any such ground.

3 ...

4 7. Section 820 of the Code states:

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

10 8. Section 821 of the Code provides that the licentiate's failure to comply with an order
11 issued under section 820 shall constitute grounds for the suspension or revocation of the
12 licentiate's certificate or license.

13 9. Section 822 of the Code states:

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

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

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

19 (c) Placing the licentiate on probation.

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

21 The licensing section shall not reinstate a revoked or suspended certificate or
22 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
23 public health and safety the person's right to practice his or her profession may be
safely reinstated.

24 COST RECOVERY

25 10. 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

1 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
2 included in a stipulated settlement.

3 FACTUAL ALLEGATIONS

4 11. On or about September 2, 2022, Respondent was arrested for inflicting corporal
5 injury on a spouse, in violation of Penal Code section 273.5(a), a felony, and for criminal threats,
6 in violation of Penal Code section 422, a felony. Charges were ultimately not filed by the
7 Orange County District Attorney's Office.

8 12. The Board initiated an investigation into Respondent's mental and physical health
9 based upon the concerning factual allegations in the arrest report, including allegations that
10 Respondent had assaulted and threatened her husband, vandalized the home of her parents-in-law,
11 and threatened to kill herself.

12 13. According to the arrest report, Respondent owns Harbor Psychiatry & Mental Health
13 with her husband (Victim). It was noted by Victim that, after the birth of their third child,
14 Respondent's mental health had begun to rapidly decline. Per Victim, Respondent has been
15 diagnosed with bipolar disorder and borderline personality and is currently in treatment. He
16 noted that Respondent has been refusing to take her medications (Lexapro¹ and Lamictal²) and
17 her mental condition has been deteriorating. With that, Victim has since filed for divorce, which
18 has infuriated Respondent. Allegations were also made regarding potential drug use by
19 Respondent as well as erratic behavior including climbing on the roof of the house.

20 14. On or about February 3, 2023, after participating in an interview with an investigator
21 with the Health Quality Investigation Unit on behalf of the Board, Respondent declined to submit
22 to a mental and physical evaluation requested pursuant to section 820 of the Code.

23 ¹ Lexapro, the trade name for escitalopram oxalate, is a selective serotonin reuptake inhibitor
24 ("SSRI") and is used in the treatment of depression. Lexapro is a dangerous drug as defined in section
4022 of the Business and Professions Code.

25 ² Lamictal is a brand name for lamotrigine, an anticonvulsant medication commonly used to treat
26 epilepsy and bipolar disorder. The U.S. Food and Drug Administration requires a black box warning to
27 warn patients for risks of Stevens-Johnson-Syndrome and Toxic Epidermal Necrolysis. According to the
28 Physicians' Desk Reference, a low initial dose and a gradual increase in dosage is recommended as
follows: 25 mg per day for two weeks (weeks 1 and 2); 50 mg per day for two weeks (weeks 3 and 4), 100
mg per day for one week (week 5), then 200 mg per day thereafter (week 6 onward). Lamictal is also a
dangerous drug pursuant to BP 4022.

1 15. On or about July 11, 2023, the Board issued an order requiring Respondent to submit
2 to a mental and physical evaluation by Board appointed physicians pursuant to section 820.

3 16. On or about August 8, 2023, a Board appointed physician (F.H.) reviewed what was
4 available of Respondent's medical records and performed a face-to-face evaluation of
5 Respondent. Respondent declined to provide F.H. with information related to her past medical
6 history, past surgical history, medications, and drug and alcohol usage, claiming "protected health
7 information." Respondent declined to provide access to her past medical records.

8 17. Due to Respondent's lack of cooperation with questioning and selective disclosure of
9 pertinent facts, F.H. was unable to determine whether Respondent has a physical illness or
10 condition that would impair her ability to practice medicine safely. After concluding his review
11 and evaluation of Respondent, F.H. recommended that Respondent undergo a psychiatric
12 evaluation, and that Respondent undergo another physical evaluation if she elects to fully disclose
13 her medical history.

14 18. On or about August 17, 2023, a Board-appointed psychiatrist (M.N.) reviewed what
15 was available of Respondent's medical records and performed a face-to-face evaluation of
16 Respondent. Respondent again declined to provide access to her past medical, psychotherapy,
17 and psychiatric records.

18 19. After concluding his review and evaluation of Respondent, M.N. found that
19 Respondent's clinical evaluation and history were consistent with a diagnosis of Compulsive
20 Personality Type, as well as an underlying mood disorder, posttraumatic stress disorder, or a non-
21 specific anxiety disorder, or an adjustment disorder with mixed disturbance of emotion and
22 conduct. M.N. further determined Respondent is unable to practice medicine safely without
23 restrictions and conditions, and that she should be under the care of a psychiatrist who will
24 provide monitoring, including taking into account her medications. M.N. further determined
25 Respondent is a danger to public health, safety, and welfare if she were to continue practicing
26 medicine.

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FIRST CAUSE FOR ACTION

(Failure to Comply with a Board Ordered Mental and/or Physical Evaluation)

20. Respondent has subjected her Physician's and Surgeon's Certificate No. A 117990 to disciplinary action under sections 2227, 2234, and 821 of the Code in that she failed to comply with a Board ordered mental and/or physical evaluation, as more particularly alleged in paragraphs 11 through 19, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

SECOND CAUSE FOR ACTION

(Impaired Ability to Practice Safely Due to Mental Illness Affecting Competency)

21. Respondent has further subjected her Physician's and Surgeon's Certificate No. A 117990 to disciplinary action under section 822 of the Code in that her ability to practice medicine safely is impaired due to mental illness affecting competency, as more particularly alleged in paragraphs 11 through 19, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

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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 117990, issued to Respondent Gisoo Zarrabi, M.D.;

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

3. Ordering Respondent Gisoo Zarrabi, 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

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

DATED: **FEB 20 2024**


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

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