

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

In the Matter of the Accusation and
Petition to Revoke Probation Against:

Christopher Robert Dobson, M.D.

Physician's and Surgeon's
Certificate No. A 138370

Case No.: 800-2024-113606

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 June 9, 2025.

IT IS SO ORDERED: May 9, 2025.

MEDICAL BOARD OF CALIFORNIA

Michelle A. Bholat, MD

Michelle A. Bholat, M.D., Chair
Panel A

1 ROB BONTA
2 Attorney General of California
3 MATTHEW M. DAVIS
4 Supervising Deputy Attorney General
5 GIOVANNI F. MEJIA
6 Deputy Attorney General
7 State Bar No. 309951
8 600 West Broadway, Suite 1800
9 San Diego, CA 92101
10 P.O. Box 85266
11 San Diego, CA 92186-5266
12 Telephone: (619) 738-9072
13 Facsimile: (619) 645-2061
14 E-mail: Giovanni.Mejia@doj.ca.gov
15 *Attorneys for Complainant*

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

In the Matter of the Accusation/Petition to
Revoke Probation Against:

Case No. 800-2024-113606

CHRISTOPHER ROBERT DOBSON, M.D.
2308 Kettner Blvd., Ste. C
San Diego, CA 92101-1283

OAH No. 2025011011

Physician's and Surgeon's Certificate
No. A 138370

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

Respondent.

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

PARTIES

1. Reji Varghese (Complainant) is the Executive Director of the Medical Board of California (Board). He brought this action solely in his official capacity and is represented in this matter by Rob Bonta, Attorney General of the State of California, by Giovanni F. Mejia, Deputy Attorney General.

2. Respondent Christopher Robert Dobson, M.D. (Respondent) is represented in this proceeding by attorney David Rosenberg, Esq., whose address is: Rosenberg, Shpall & Zeigen, APLC, 10815 Rancho Bernardo Road, Suite 260, San Diego, CA 92127.

1 3. On or about September 22, 2015, the Board issued Physician's and Surgeon's
2 Certificate No. A 138370 to Christopher Robert Dobson, M.D. (Respondent). The Physician's
3 and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
4 in Accusation/Petition to Revoke Probation No. 800-2024-113606, and will expire on August 31,
5 2025, unless renewed.

JURISDICTION

7 4. Accusation/Petition to Revoke Probation No. 800-2024-113606 was filed before the
8 Board, and is currently pending against Respondent. The Accusation/Petition to Revoke
9 Probation and all other statutorily required documents were properly served on Respondent on
10 January 2, 2025. Respondent timely filed his Notice of Defense contesting the
11 Accusation/Petition to Revoke Probation.

12 5. A copy of Accusation/Petition to Revoke Probation No. 800-2024-113606 is attached
13 as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

15 6. Respondent has carefully read, fully discussed with counsel, and understands the
16 charges and allegations in Accusation/Petition to Revoke Probation No. 800-2024-113606.
17 Respondent has also carefully read, fully discussed with his counsel, and understands the effects
18 of this Stipulated Settlement and Disciplinary Order.

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

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

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CULPABILITY

2 9. Respondent admits the truth of each and every charge and allegation in
3 Accusation/Petition to Revoke Probation No. 800-2024-113606.

4 10. Respondent agrees that his Physician's and Surgeon's Certificate is subject to
5 discipline and agrees to be bound by the Board's probationary terms as set forth in the
6 Disciplinary Order below.

CONTINGENCY

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

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

21 13. Respondent agrees that if he ever petitions for early termination or modification of
22 probation, or if an accusation and/or petition to revoke probation is filed against him before the
23 Board, all of the charges and allegations contained in Accusation/Petition to Revoke Probation
24 No. 800-2024-113606 shall be deemed true, correct and fully admitted by respondent for
25 purposes of any such proceeding or any other licensing proceeding involving Respondent in the
26 State of California.

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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:

DISCIPLINARY ORDER

8 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 138370
9 issued to Respondent Christopher Robert Dobson, M.D. is revoked. However, the revocation is
10 stayed and Respondent is placed on probation for five (5) years on the following terms and
11 conditions of probation. This Decision and Disciplinary Order shall, as of its effective date,
12 supersede the probationary order in case No. 800-2018-041214:

13 1. CONTROLLED SUBSTANCES - ABSTAIN FROM USE. Respondent shall abstain
14 completely from the personal use or possession of controlled substances as defined in the
15 California Uniform Controlled Substances Act, dangerous drugs as defined by Business and
16 Professions Code section 4022, and any drugs requiring a prescription. This prohibition does not
17 apply to medications lawfully prescribed to Respondent by another practitioner for a bona fide
18 illness or condition.

19 Within 15 calendar days of receiving any lawfully prescribed medications, Respondent
20 shall notify the Board or its designee of the: issuing practitioner's name, address, and telephone
21 number; medication name, strength, and quantity; and issuing pharmacy name, address, and
22 telephone number.

23 2. ALCOHOL - ABSTAIN FROM USE. Respondent shall abstain completely from the
24 use of products or beverages containing alcohol.

25 3. BIOLOGICAL FLUID TESTING. Respondent shall immediately submit to
26 biological fluid testing, at Respondent's expense, upon request of the Board or its designee.
27 "Biological fluid testing" may include, but is not limited to, urine, blood, breathalyzer, hair
28 follicle testing, or similar drug screening approved by the Board or its designee. Respondent shall

1 make daily contact with the Board or its designee to determine whether biological fluid testing is
2 required. Respondent shall be tested on the date of the notification as directed by the Board or its
3 designee. The Board may order a Respondent to undergo a biological fluid test on any day, at any
4 time, including weekends and holidays. Except when testing on a specific date as ordered by the
5 Board or its designee, the scheduling of biological fluid testing shall be done on a random basis.
6 The cost of biological fluid testing shall be borne by the Respondent.

7 During the first year of probation, Respondent shall be subject to 52 to 104 random tests.
8 During the second year of probation and for the duration of the probationary term, up to five (5)
9 years, Respondent shall be subject to 36 to 104 random tests per year. Only if there has been no
10 positive biological fluid tests in the previous five (5) consecutive years of probation, may testing
11 be reduced to one (1) time per month. Nothing precludes the Board from increasing the number of
12 random tests to the first-year level of frequency for any reason.

13 Prior to practicing medicine, Respondent shall contract with a laboratory or service,
14 approved in advance by the Board or its designee, that will conduct random, unannounced,
15 observed, biological fluid testing and meets all of the following standards:

- 16 (a) Its specimen collectors are either certified by the Drug and Alcohol Testing Industry
17 Association or have completed the training required to serve as a collector for the United
18 States Department of Transportation.
- 19 (b) Its specimen collectors conform to the current United States Department of
20 Transportation Specimen Collection Guidelines.
- 21 (c) Its testing locations comply with the Urine Specimen Collection Guidelines published
22 by the United States Department of Transportation without regard to the type of test
23 administered.
- 24 (d) Its specimen collectors observe the collection of testing specimens.
- 25 (e) Its laboratories are certified and accredited by the United States Department of Health
26 and Human Services.
- 27 (f) Its testing locations shall submit a specimen to a laboratory within one (1) business day
28 of receipt and all specimens collected shall be handled pursuant to chain of custody

1 procedures. The laboratory shall process and analyze the specimens and provide legally
2 defensible test results to the Board within seven (7) business days of receipt of the
3 specimen. The Board will be notified of non-negative results within one (1) business day
4 and will be notified of negative test results within seven (7) business days.

5 (g) Its testing locations possess all the materials, equipment, and technical expertise
6 necessary in order to test Respondent on any day of the week.

7 (h) Its testing locations are able to scientifically test for urine, blood, and hair specimens for
8 the detection of alcohol and illegal and controlled substances.

9 (i) It maintains testing sites located throughout California.

10 (j) It maintains an automated 24-hour toll-free telephone system and/or a secure on-line
11 computer database that allows the Respondent to check in daily for testing.

12 (k) It maintains a secure, HIPAA-compliant website or computer system that allows staff
13 access to drug test results and compliance reporting information that is available 24 hours a
14 day.

15 (l) It employs or contracts with toxicologists that are licensed physicians and have
16 knowledge of substance abuse disorders and the appropriate medical training to interpret
17 and evaluate laboratory biological fluid test results, medical histories, and any other
18 information relevant to biomedical information.

19 (m) It will not consider a toxicology screen to be negative if a positive result is obtained
20 while practicing, even if the Respondent holds a valid prescription for the substance.

21 Prior to changing testing locations for any reason, including during vacation or other travel,
22 alternative testing locations must be approved by the Board and meet the requirements above.

23 The contract shall require that the laboratory directly notify the Board or its designee of
24 non-negative results within one (1) business day and negative test results within seven (7)
25 business days of the results becoming available. Respondent shall maintain this laboratory or
26 service contract during the period of probation.

27 A certified copy of any laboratory test result may be received in evidence in any
28 proceedings between the Board and Respondent.

1 If a biological fluid test result indicates Respondent has used, consumed, ingested, or
2 administered to himself or herself a prohibited substance, the Board shall order Respondent to
3 cease practice and instruct Respondent to leave any place of work where Respondent is practicing
4 medicine or providing medical services. The Board shall immediately notify all of Respondent's
5 employers, supervisors and work monitors, if any, that Respondent may not practice medicine or
6 provide medical services while the cease-practice order is in effect.

7 A biological fluid test will not be considered negative if a positive result is obtained while
8 practicing, even if the practitioner holds a valid prescription for the substance. If no prohibited
9 substance use exists, the Board shall lift the cease-practice order within one (1) business day.

10 After the issuance of a cease-practice order, the Board shall determine whether the positive
11 biological fluid test is in fact evidence of prohibited substance use by consulting with the
12 specimen collector and the laboratory, communicating with the licensee, his or her treating
13 physician(s), other health care provider, or group facilitator, as applicable.

14 For purposes of this condition, the terms "biological fluid testing" and "testing" mean the
15 acquisition and chemical analysis of a Respondent's urine, blood, breath, or hair.

16 For purposes of this condition, the term "prohibited substance" means an illegal drug, a
17 lawful drug not prescribed or ordered by an appropriately licensed health care provider for use by
18 Respondent and approved by the Board, alcohol, or any other substance the Respondent has been
19 instructed by the Board not to use, consume, ingest, or administer to himself or herself.

20 If the Board confirms that a positive biological fluid test is evidence of use of a prohibited
21 substance, Respondent has committed a major violation, as defined in section 1361.52(a) of
22 title 16 of the California Code of Regulations, and the Board shall impose any or all of the
23 consequences set forth in section 1361.52(b), in addition to any other terms or conditions the
24 Board determines are necessary for public protection or to enhance Respondent's rehabilitation.

25 4. **CLINICAL DIAGNOSTIC EVALUATIONS AND REPORTS:** Within thirty (30)
26 calendar days of the effective date of this Decision, and on whatever periodic basis thereafter as
27 may be required by the Board or its designee, Respondent shall undergo and complete a clinical
28 diagnostic evaluation, including any and all testing deemed necessary, by a Board-appointed

1 board-certified physician and surgeon. The examiner shall consider any information provided by
2 the Board or its designee and any other information he or she deems relevant, and shall furnish a
3 written evaluation report to the Board or its designee.

4 The clinical diagnostic evaluation shall be conducted by a licensed physician and surgeon
5 who holds a valid, unrestricted license, has three (3) years' experience in providing evaluations of
6 physicians and surgeons with substance abuse disorders, and is approved by the Board or its
7 designee. The clinical diagnostic evaluation shall be conducted in accordance with acceptable
8 professional standards for conducting substance abuse clinical diagnostic evaluations. The
9 evaluator shall not have a current or former financial, personal, or business relationship with
10 Respondent within the last five (5) years. The evaluator shall provide an objective, unbiased, and
11 independent evaluation. The clinical diagnostic evaluation report shall set forth, in the evaluator's
12 opinion, whether Respondent has a substance abuse problem, whether Respondent is a threat to
13 himself or herself or others, and recommendations for substance abuse treatment, practice
14 restrictions, or other recommendations related to Respondent's rehabilitation and ability to
15 practice safely. If the evaluator determines during the evaluation process that Respondent is a
16 threat to himself or herself or others, the evaluator shall notify the Board within twenty-four (24)
17 hours of such a determination.

18 In formulating his or her opinion as to whether Respondent is safe to return to either part-
19 time or full-time practice and what restrictions or recommendations should be imposed, including
20 participation in an inpatient or outpatient treatment program, the evaluator shall consider the
21 following factors: Respondent's license type; Respondent's history; Respondent's documented
22 length of sobriety (i.e., length of time that has elapsed since Respondent's last substance use);
23 Respondent's scope and pattern of substance abuse; Respondent's treatment history, medical
24 history and current medical condition; the nature, duration and severity of Respondent's
25 substance abuse problem or problems; and whether Respondent is a threat to himself or herself or
26 the public.

27 For all clinical diagnostic evaluations, a final written report shall be provided to the Board
28 no later than ten (10) days from the date the evaluator is assigned the matter. If the evaluator

1 requests additional information or time to complete the evaluation and report, an extension may
2 be granted, but shall not exceed thirty (30) days from the date the evaluator was originally
3 assigned the matter.

4 The Board shall review the clinical diagnostic evaluation report within five (5) business
5 days of receipt to determine whether Respondent is safe to return to either part-time or full-time
6 practice and what restrictions or recommendations shall be imposed on Respondent based on the
7 recommendations made by the evaluator. Respondent shall not be returned to practice until he or
8 she has at least thirty (30) days of negative biological fluid tests or biological fluid tests indicating
9 that he or she has not used, consumed, ingested, or administered to himself or herself a prohibited
10 substance, as defined in section 1361.51, subdivision (e), of title 16 of the California Code of
11 Regulations.

12 Clinical diagnostic evaluations conducted prior to the effective date of this Decision shall
13 not be accepted towards the fulfillment of this requirement. The cost of the clinical diagnostic
14 evaluation, including any and all testing deemed necessary by the examiner, the Board or its
15 designee, shall be borne by the licensee.

16 Respondent shall not engage in the practice of medicine until notified by the Board or its
17 designee that he or she is fit to practice medicine safely. The period of time that Respondent is not
18 practicing medicine shall not be counted toward completion of the term of probation. Respondent
19 shall undergo biological fluid testing as required in this Decision at least two (2) times per week
20 while awaiting the notification from the Board if he or she is fit to practice medicine safely.

21 Respondent shall comply with all restrictions or conditions recommended by the examiner
22 conducting the clinical diagnostic evaluation within fifteen (15) calendar days after being notified
23 by the Board or its designee.

24 5. NOTICE OF EMPLOYER OR SUPERVISOR INFORMATION. Within seven (7)
25 days of the effective date of this Decision, Respondent shall provide to the Board the names,
26 physical addresses, mailing addresses, and telephone numbers of any and all employers and
27 supervisors. Respondent shall also provide specific, written consent for the Board, Respondent's
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1 worksite monitor, and Respondent's employers and supervisors to communicate regarding
2 Respondent's work status, performance, and monitoring.

3 For purposes of this section, "supervisors" shall include the Chief of Staff and Health or
4 Well Being Committee Chair, or equivalent, if applicable, when the Respondent has medical staff
5 privileges.

6 6. **VIOLATION OF PROBATION CONDITION FOR SUBSTANCE ABUSING**
7 **LICENSEES**. Failure to fully comply with any term or condition of probation is a violation of
8 probation.

9 A. If Respondent commits a major violation of probation as defined by section
10 1361.52, subdivision (a), of title 16 of the California Code of Regulations, the Board shall take
11 one or more of the following actions:

12 (1) Issue an immediate cease-practice order and order Respondent to undergo a clinical
13 diagnostic evaluation to be conducted in accordance with section 1361.5, subdivision (c)(1), of
14 title 16 of the California Code of Regulations, at Respondent's expense. The cease-practice order
15 issued by the Board or its designee shall state that Respondent must test negative for at least a
16 month of continuous biological fluid testing before being allowed to resume practice. For
17 purposes of determining the length of time a Respondent must test negative while undergoing
18 continuous biological fluid testing following issuance of a cease-practice order, a month is
19 defined as thirty calendar (30) days. Respondent may not resume the practice of medicine until
20 notified in writing by the Board or its designee that he or she may do so.

21 (2) Increase the frequency of biological fluid testing.

22 (3) Refer Respondent for further disciplinary action, such as suspension, revocation, or
23 other action as determined by the Board or its designee.

24 B. If Respondent commits a minor violation of probation as defined by section
25 1361.52, subdivision (c), of title 16 of the California Code of Regulations, the Board shall take
26 one or more of the following actions:

27 (1) Issue a cease-practice order;

28 (2) Order practice limitations;

- 1 (3) Order or increase supervision of Respondent;
- 2 (4) Order increased documentation;
- 3 (5) Issue a citation and fine, or a warning letter;
- 4 (6) Order Respondent to undergo a clinical diagnostic evaluation to be conducted in
- 5 accordance with section 1361.5, subdivision (c)(1), of title 16 of the California Code of
- 6 Regulations, at Respondent's expense;
- 7 (7) Take any other action as determined by the Board or its designee.

8 C. Nothing in this Decision shall be considered a limitation on the Board's authority
9 to revoke Respondent's probation if he or she has violated any term or condition of probation. If
10 Respondent violates probation in any respect, the Board, after giving Respondent notice and the
11 opportunity to be heard, may revoke probation and carry out the disciplinary order that was
12 stayed. If an Accusation, or Petition to Revoke Probation, or an Interim Suspension Order is filed
13 against Respondent during probation, the Board shall have continuing jurisdiction until the matter
14 is final, and the period of probation shall be extended until the matter is final.

15 7. EDUCATION COURSE. Within 60 calendar days of the effective date of this
16 Decision, and on an annual basis thereafter, Respondent shall submit to the Board or its designee
17 for its prior approval educational program(s) or course(s) which shall not be less than 40 hours
18 per year, for each year of probation. The educational program(s) or course(s) shall be aimed at
19 correcting any areas of deficient practice or knowledge and shall be Category I certified. The
20 educational program(s) or course(s) shall be at Respondent's expense and shall be in addition to
21 the Continuing Medical Education (CME) requirements for renewal of licensure. Following the
22 completion of each course, the Board or its designee may administer an examination to test
23 Respondent's knowledge of the course. Respondent shall provide proof of attendance for 65
24 hours of CME of which 40 hours were in satisfaction of this condition.

25 8. MONITORING - PRACTICE. Within 30 calendar days of the effective date of this
26 Decision, Respondent shall submit to the Board or its designee for prior approval as a practice
27 monitor(s), the name and qualifications of one or more licensed physicians and surgeons whose
28 licenses are valid and in good standing, and who are preferably American Board of Medical

1 Specialties (ABMS) certified. A monitor shall have no prior or current business or personal
2 relationship with Respondent, or other relationship that could reasonably be expected to
3 compromise the ability of the monitor to render fair and unbiased reports to the Board, including
4 but not limited to any form of bartering, shall be in Respondent's field of practice, and must agree
5 to serve as Respondent's monitor. Respondent shall pay all monitoring costs.

6 The Board or its designee shall provide the approved monitor with copies of the Decision(s)
7 and Accusation(s), and a proposed monitoring plan. Within 15 calendar days of receipt of the
8 Decision(s), Accusation(s), and proposed monitoring plan, the monitor shall submit a signed
9 statement that the monitor has read the Decision(s) and Accusation(s), fully understands the role
10 of a monitor, and agrees or disagrees with the proposed monitoring plan. If the monitor disagrees
11 with the proposed monitoring plan, the monitor shall submit a revised monitoring plan with the
12 signed statement for approval by the Board or its designee.

13 Within 60 calendar days of the effective date of this Decision, and continuing throughout
14 probation, Respondent's practice shall be monitored by the approved monitor. Respondent shall
15 make all records available for immediate inspection and copying on the premises by the monitor
16 at all times during business hours and shall retain the records for the entire term of probation.

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

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

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1 If the monitor resigns or is no longer available, Respondent shall, within 5 calendar days of
2 such resignation or unavailability, submit to the Board or its designee, for prior approval, the
3 name and qualifications of a replacement monitor who will be assuming that responsibility within
4 15 calendar days. If Respondent fails to obtain approval of a replacement monitor within 60
5 calendar days of the resignation or unavailability of the monitor, Respondent shall receive a
6 notification from the Board or its designee to cease the practice of medicine within three (3)
7 calendar days after being so notified. Respondent shall cease the practice of medicine until a
8 replacement monitor is approved and assumes monitoring responsibility.

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

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

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

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

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

1 12. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby
2 ordered to reimburse the Board its costs of investigation and enforcement in the amount of
3 \$13,797. Costs shall be payable to the Medical Board of California. Failure to pay such costs shall
4 be considered a violation of probation.

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

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

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

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

16 14. GENERAL PROBATION REQUIREMENTS.

17 Compliance with Probation Unit

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

19 Address Changes

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

25 Place of Practice

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

1 License Renewal

2 Respondent shall maintain a current and renewed California physician's and surgeon's
3 license.

4 Travel or Residence Outside California

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

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

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

14 16. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or
15 its designee in writing within 15 calendar days of any periods of non-practice lasting more than
16 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is
17 defined as any period of time Respondent is not practicing medicine as defined in Business and
18 Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month in direct
19 patient care, clinical activity or teaching, or other activity as approved by the Board. If
20 Respondent resides in California and is considered to be in non-practice, Respondent shall
21 comply with all terms and conditions of probation. All time spent in an intensive training program
22 which has been approved by the Board or its designee shall not be considered non-practice and
23 does not relieve Respondent from complying with all the terms and conditions of probation.

24 Practicing medicine in another state of the United States or Federal jurisdiction while on
25 probation with the medical licensing authority of that state or jurisdiction shall not be considered
26 non-practice. A Board-ordered suspension of practice shall not be considered as a period of non-
27 practice.

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

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

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

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

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

19 18. VIOLATION OF PROBATION. Failure to fully comply with any term or condition
20 of probation is a violation of probation. If Respondent violates probation in any respect, the
21 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and
22 carry out the disciplinary order that was stayed. If an Accusation, or Petition to Revoke Probation,
23 or an Interim Suspension Order is filed against Respondent during probation, the Board shall have
24 continuing jurisdiction until the matter is final, and the period of probation shall be extended until
25 the matter is final.

26 19. LICENSE SURRENDER. Following the effective date of this Decision, if
27 Respondent ceases practicing due to retirement or health reasons or is otherwise unable to satisfy
28 the terms and conditions of probation, Respondent may request to surrender his or her license.

1 The Board reserves the right to evaluate Respondent's request and to exercise its discretion in
2 determining whether or not to grant the request, or to take any other action deemed appropriate
3 and reasonable under the circumstances. Upon formal acceptance of the surrender, Respondent
4 shall within 15 calendar days deliver Respondent's wallet and wall certificate to the Board or its
5 designee and Respondent shall no longer practice medicine. Respondent will no longer be subject
6 to the terms and conditions of probation. If Respondent re-applies for a medical license, the
7 application shall be treated as a petition for reinstatement of a revoked certificate.

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

13 21. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for a
14 new license or certification, or petition for reinstatement of a license, by any other health care
15 licensing action agency in the State of California, all of the charges and allegations contained in
16 Accusation/Petition to Revoke Probation No. 800-2024-113606 shall be deemed to be true,
17 correct, and admitted by Respondent for the purpose of any Statement of Issues or any other
18 proceeding seeking to deny or restrict license.

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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, David Rosenberg, Esq. 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.

8 DATED: 03 / 31 / 2025

CHRISTOPHER ROBERT DOBSON, M.D.
Respondent

10 I have read and fully discussed with Respondent Christopher Robert Dobson, M.D. the
11 terms and conditions and other matters contained in the above Stipulated Settlement and
12 Disciplinary Order. I approve its form and content.

14 DATED: 3/31/2025

DAVID ROSENBERG, ESQ.
Attorney for Respondent

ENDORSEMENT

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

20 DATED: April 1, 2025
21

Respectfully submitted,

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

GIOVANNI F. MEJIA
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation/Petition to Revoke Probation No. 800-2024-113606

1 ROB BONTA
2 Attorney General of California
3 MATTHEW M. DAVIS
4 Supervising Deputy Attorney General
5 GIOVANNI F. MEJIA
6 Deputy Attorney General
7 State Bar No. 309951
600 West Broadway, Suite 1800
San Diego, CA 92101
P.O. Box 85266
San Diego, CA 92186-5266
Telephone: (619) 738-9072
Facsimile: (619) 645-2061

Attorneys for Complainant

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

13 In the Matter of the Accusation and Petition to
Revoke Probation Against:

Case No. 800-2024-113606

14 Christopher Robert Dobson, M.D.
15 2308 Kettner Blvd., Ste. C
San Diego, CA 92101-1283

ACCUSATION AND PETITION TO REVOKE PROBATION

16 Physician's and Surgeon's Certificate
17 No. A 138370,

Respondent.

PARTIES

1. Reji Varghese (Complainant) brings this Accusation and Petition to Revoke Probation
solely in his official capacity as the Executive Director of the Medical Board of California,
Department of Consumer Affairs (Board).

24 2. On or about September 22, 2015, the Board issued Physician's and Surgeon's
25 Certificate No. A 138370 to Christopher Robert Dobson, M.D. (Respondent). The Physician's
26 and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
27 herein and will expire on August 31, 2025, unless renewed.

28: | ////

1 3. In an action entitled *In the Matter of the Accusation Against Christopher Robert*
2 *Dobson, M.D.*, case No. 800-2018-041214, the Board issued a Decision (the Decision), effective
3 August 17, 2022, in which it revoked Respondent's Physician's and Surgeon's Certificate
4 No. A 138370, stayed such revocation, and placed Respondent on probation for a period of
5 35 months with certain terms and conditions. A true and correct copy of this Decision is attached
6 hereto as exhibit A and is incorporated by reference as if fully set forth herein.

JURISDICTION

8 4. This Accusation and Petition to Revoke Probation is brought before the Board, under
9 the authority of the Decision, and the following laws. All section references are to the Business
10 and Professions Code (Code) unless otherwise indicated.

11 5. Section 2227, subdivision (a), of the Code states:

12 A licensee whose matter has been heard by an administrative law judge of the
13 Medical Quality Hearing Panel as designated in Section 11371 of the Government
14 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:

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

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

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

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

23 6. Section 2234 of the Code states, in pertinent part: "The board shall take action against
24 any licensee who is charged with unprofessional conduct."

25 7. Section 2239, subdivision (a), of the Code states:

26 The use or prescribing for or administering to himself or herself, of any
27 controlled substance; or the use of any of the dangerous drugs specified in Section
28 4022, or of alcoholic beverages, to the extent, or in such a manner as to be dangerous
 or injurious to the licensee, or to any other person or to the public, or to the extent that
 such use impairs the ability of the licensee to practice medicine safely or more than

one misdemeanor or any felony involving the use, consumption, or self-administration of any of the substances referred to in this section, or any combination thereof, constitutes unprofessional conduct. The record of the conviction is conclusive evidence of such unprofessional conduct.

COST RECOVERY

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

FACTUAL ALLEGATIONS

12 9. On or about November 5, 2024, Respondent provided a biological fluid specimen that
13 subsequently tested positive for the presence of methamphetamine and metabolites of
14 methamphetamine.

15 10. The results of the biological fluid testing performed on the specimen Respondent
16 provided on or about November 5, 2024 were consistent with Respondent's use of a substance
17 containing methamphetamine.

18 11. Methamphetamine is a Schedule II controlled substance pursuant to Health and
19 Safety Code section 11055, subdivision (d), and a dangerous drug pursuant to Business and
20 Professions Code section 4022.

CAUSE TO REVOKE PROBATION

(Failure to Abstain from the Use of Controlled Substances)

23 12. As in effect at all times on or after 5 p.m. on August 17, 2022, pursuant to the
24 Decision, condition 1 of Respondent's probation stated:

25 **CONTROLLED SUBSTANCES – ABSTAIN FROM USE.** Respondent shall
26 abstain completely from the personal use or possession of controlled substances as
27 defined in the California Uniform Controlled Substances Act, dangerous drugs as
defined by Business and Professions Code section 4022, and any drugs requiring a
prescription. This prohibition does not apply to medications lawfully prescribed to
Respondent by another practitioner for a bona fide illness or condition.

1 Within 15 calendar days of receiving any lawfully prescribed medications,
2 Respondent shall notify the Board or its designee of the: issuing practitioner's name,
3 address, and telephone number; medication name, strength, and quantity; and issuing
4 pharmacy name, address, and telephone number.

5 If Respondent has a confirmed positive biological fluid test for any substance
6 (whether or not legally prescribed) and has not reported the use to the Board or its
7 designee, Respondent shall receive a notification from the Board or its designee to
8 immediately cease the practice of medicine. The Respondent shall not resume the
9 practice of medicine until the final decision on an accusation and/or a petition to
10 revoke probation is effective. An accusation and/or petition to revoke probation shall
11 be filed by the Board within 30 days of the notification to cease practice. If the
12 Respondent requests a hearing on the accusation and/or petition to revoke probation,
13 the Board shall provide the Respondent with a hearing within 30 days of the request,
14 unless the Respondent stipulates to a later hearing. If the case is heard by an
15 Administrative Law Judge alone, he or she shall forward a Proposed Decision to the
16 Board within 15 days of submission of the matter. Within 15 days of receipt by the
17 Board of the Administrative Law Judge's proposed decision, the Board shall issue its
18 Decision, unless good cause can be shown for the delay. If the case is heard by the
19 Board, the Board shall issue its decision within 15 days of submission of the case,
20 unless good cause can be shown for the delay. Good cause includes, but is not limited
21 to, non-adoption of the proposed decision, requests for reconsideration, remands and
22 other interlocutory orders issued by the Board. The cessation of practice shall not
23 apply to the reduction of the probationary time period.

24 If the Board does not file an accusation or petition to revoke probation within
25 30 days of the issuance of the notification to cease practice or does not provide
26 Respondent with a hearing within 30 days of a such a request, the notification of
27 cease practice shall be dissolved.

28 13. Respondent's probation is subject to revocation because he has failed to abstain
29 completely from the personal use or possession of controlled substances as required by
30 condition 1 of his probation, as more particularly alleged in paragraphs 9 through 11, above,
31 which are hereby incorporated by reference as if fully set forth herein.

32 **CAUSE FOR DISCIPLINE**

33 **(Use of a Controlled Substance)**

34 14. Respondent has subjected his Physician's and Surgeon's Certificate No. A 138370 to
35 disciplinary action under sections 2234 and 2239, subdivision (a), of the Code in that he used a
36 controlled substance as more particularly alleged in paragraphs 9 through 11, above, which are
37 hereby incorporated by reference as if fully set forth herein.

38 **DISCIPLINARY CONSIDERATIONS**

39 15. To determine the degree of discipline, if any, to be imposed on Respondent,
40 Complainant alleges that effective August 17, 2022, by the Decision, the Board revoked

1 Respondent's Physician's and Surgeon's Certificate for gross negligence and repeated negligent
2 acts including possessing controlled substances without a valid prescription and refusing to
3 cooperate with a Board investigation; violating one or more statutes or regulations regulating
4 dangerous drugs or controlled substances; and failing to attend and participate in an interview by
5 the Board. The Board stayed said revocation and placed Respondent on probation for a period of
6 35 months.

7 16. To further determine the degree of discipline, if any, to be imposed on Respondent,
8 Complainant alleges that on or about December 3, 2024, the Board issued a cease practice order
9 (CPO) finding that Respondent had failed to obey condition 1 of his probation, by testing positive
10 for methamphetamine. The CPO remains in effect as of the time of the filing of this Accusation
11 and Petition to Revoke Probation.

PRAYER

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

15 1. Revoking the probation that was granted by the Medical Board of California in case
16 No. 800-2018-041214 and imposing the disciplinary order that was stayed thereby revoking
17 Physician's and Surgeon's Certificate No. A 138370 issued to Respondent Christopher Robert
18 Dobson, M.D.;

19 2. Revoking or suspending Physician's and Surgeon's Certificate No. A 138370, issued
20 to Respondent Christopher Robert Dobson, M.D.;

21 3. Revoking, suspending or denying approval of Respondent Christopher Robert
22 Dobson, M.D.'s authority to supervise physician assistants and advanced practice nurses;

23 4. Ordering Respondent Christopher Robert Dobson, M.D. to pay the Medical Board of
24 California the reasonable costs of the investigation and enforcement of this case and, if placed on
25 probation, to pay the costs of probation monitoring; and

26 5. Taking such other and further action as deemed necessary and proper.

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1 DATED: JAN 02 2025



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

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Exhibit A

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

In the Matter of the Accusation
Against:

Christopher Robert Dobson, M.D.

Physician's and Surgeon's
Certificate No. A 138370

Case No.: 800-2018-041214

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 August 17, 2022.

IT IS SO ORDERED: July 18, 2022.

MEDICAL BOARD OF CALIFORNIA


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

1 ROB BONTA
2 Attorney General of California
3 MATTHEW M. DAVIS
4 Supervising Deputy Attorney General
5 GIOVANNI F. MEJIA
6 Deputy Attorney General
7 State Bar No. 309951
600 West Broadway, Suite 1800
5 San Diego, CA 92101
6 P.O. Box 85266
7 San Diego, CA 92186-5266
Telephone: (619) 738-9072
Facsimile: (619) 645-2061

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

13 | In the Matter of the Accusation Against: | Case No. 800-2018-041214

14 CHRISTOPHER ROBERT DOBSON, M.D. OAH No. 2021050890
4510 Executive Dr., Ste. 107
15 San Diego, CA 92121-3022 STIPULATED SETT.

16 Physician's and Surgeon's Certificate
No. A 138370,

| Case No. 800-2018-041214

OAH No. 2021050890

STIPULATED SETTLEMENT AND DISCIPLINARY ORDER

Respondent.

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

PARTIES

22 1. William Prasifka (Complainant) is the Executive Director of the Medical Board of
23 California (Board). He brought this action solely in his official capacity and is represented in this
24 matter by Rob Bonta, Attorney General of the State of California, by Giovanni F. Mejia, Deputy
25 Attorney General.

26 2. Respondent Christopher Robert Dobson, M.D. (Respondent) is represented in this
27 proceeding by attorney Kevin C. Murphy, Esq., whose address is: Murphy Jones APC, 5575 Lake
28 Park Way, Suite 218, San Diego, CA 91942.

1 3. On or about September 22, 2015, the Board issued Physician's and Surgeon's
2 Certificate No. A 138370 to Christopher Robert Dobson, M.D. (Respondent). The Physician's
3 and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
4 in Accusation No. 800-2018-041214, and will expire on August 31, 2023, unless renewed.

JURISDICTION

6 4. Accusation No. 800-2018-041214 was filed before the Board, and is currently
7 pending against Respondent. The Accusation and all other statutorily required documents were
8 properly served on Respondent on February 11, 2021. Respondent timely filed his Notice of
9 Defense contesting the Accusation.

10 5. A copy of Accusation No. 800-2018-041214 is attached as exhibit A and incorporated
11 herein by reference.

ADVISEMENT AND WAIVERS

13 6. Respondent has carefully read, fully discussed with counsel, and understands the
14 charges and allegations in Accusation No. 800-2018-041214. Respondent has also carefully read,
15 fully discussed with his counsel, and understands the effects of this Stipulated Settlement and
16 Disciplinary Order.

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

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

CULPABILITY

26 9. Respondent does not contest that, at an administrative hearing, complainant could
27 establish a prima facie case with respect to the charges and allegations in Accusation
28 No. 800-2018-041214, a true and correct copy of which is attached hereto as exhibit A, and that

1 he has thereby subjected his Physician's and Surgeon's Certificate, No. A 138370 to disciplinary
2 action.

3 10. Respondent agrees that his Physician's and Surgeon's Certificate is subject to
4 discipline and he agrees to be bound by the Board's probationary terms as set forth in the
5 Disciplinary Order below.

6 11. Respondent agrees that if he ever petitions for early termination or modification of
7 probation, or if an accusation and/or petition to revoke probation is filed against him before the
8 Board, all of the charges and allegations contained in Accusation No. 800-2018-041214 shall be
9 deemed true, correct and fully admitted by respondent for purposes of any such proceeding or any
10 other licensing proceeding involving Respondent in the State of California.

11 12. The admissions made by Respondent herein are only for the purposes of this
12 proceeding, or any other proceedings in which the Medical Board of California or other
13 professional licensing agency is involved, and shall not be admissible in any other criminal or
14 civil proceeding.

15 **CONTINGENCY**

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

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ADDITIONAL PROVISIONS

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

15. 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.

16. 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 138370 issued to Respondent Christopher Robert Dobson, M.D. is revoked. However, the revocation is stayed and Respondent is placed on probation for thirty-five (35) months on the following terms and conditions:

1. CONTROLLED SUBSTANCES - ABSTAIN FROM USE. Respondent shall abstain completely from the personal use or possession of controlled substances as defined in the California Uniform Controlled Substances Act, dangerous drugs as defined by Business and Professions Code section 4022, and any drugs requiring a prescription. This prohibition does not apply to medications lawfully prescribed to Respondent by another practitioner for a bona fide illness or condition.

Within 15 calendar days of receiving any lawfully prescribed medications, Respondent shall notify the Board or its designee of the: issuing practitioner's name, address, and telephone number; medication name, strength, and quantity; and issuing pharmacy name, address, and telephone number.

If Respondent has a confirmed positive biological fluid test for any substance (whether or not legally prescribed) and has not reported the use to the Board or its designee, Respondent shall receive a notification from the Board or its designee to immediately cease the practice of

1 medicine. The Respondent shall not resume the practice of medicine until the final decision on an
2 accusation and/or a petition to revoke probation is effective. An accusation and/or petition to
3 revoke probation shall be filed by the Board within 30 days of the notification to cease practice. If
4 the Respondent requests a hearing on the accusation and/or petition to revoke probation, the
5 Board shall provide the Respondent with a hearing within 30 days of the request, unless the
6 Respondent stipulates to a later hearing. If the case is heard by an Administrative Law Judge
7 alone, he or she shall forward a Proposed Decision to the Board within 15 days of submission of
8 the matter. Within 15 days of receipt by the Board of the Administrative Law Judge's proposed
9 decision, the Board shall issue its Decision, unless good cause can be shown for the delay. If the
10 case is heard by the Board, the Board shall issue its decision within 15 days of submission of the
11 case, unless good cause can be shown for the delay. Good cause includes, but is not limited to,
12 non-adoption of the proposed decision, requests for reconsideration, remands and other
13 interlocutory orders issued by the Board. The cessation of practice shall not apply to the reduction
14 of the probationary time period.

15 If the Board does not file an accusation or petition to revoke probation within 30 days of the
16 issuance of the notification to cease practice or does not provide Respondent with a hearing
17 within 30 days of a such a request, the notification of cease practice shall be dissolved.

18 2. ALCOHOL - ABSTAIN FROM USE. Respondent shall abstain completely from the
19 use of products or beverages containing alcohol.

20 If Respondent has a confirmed positive biological fluid test for alcohol, Respondent shall
21 receive a notification from the Board or its designee to immediately cease the practice of
22 medicine. The Respondent shall not resume the practice of medicine until the final decision on an
23 accusation and/or a petition to revoke probation is effective. An accusation and/or petition to
24 revoke probation shall be filed by the Board within 30 days of the notification to cease practice. If
25 the Respondent requests a hearing on the accusation and/or petition to revoke probation, the
26 Board shall provide the Respondent with a hearing within 30 days of the request, unless the
27 Respondent stipulates to a later hearing. the case is heard by an Administrative Law Judge alone,
28 he or she shall forward a Proposed Decision to the Board within 15 days of submission of the

1 matter. Within 15 days of receipt by the Board of the Administrative Law Judge's proposed
2 decision, the Board shall issue its Decision, unless good cause can be shown for the delay. If the
3 case is heard by the Board, the Board shall issue its decision within 15 days of submission of the
4 case, unless good cause can be shown for the delay. Good cause includes, but is not limited to,
5 non-adoption of the proposed decision, requests for reconsideration, remands and other
6 interlocutory orders issued by the Board. The cessation of practice shall not apply to the reduction
7 of the probationary time period.

8 If the Board does not file an accusation or petition to revoke probation within 30 days of the
9 issuance of the notification to cease practice or does not provide Respondent with a hearing
10 within 30 days of such a request, the notification of cease practice shall be dissolved.

11 3. BIOLOGICAL FLUID TESTING. Respondent shall immediately submit to
12 biological fluid testing, at Respondent's expense, upon request of the Board or its designee.
13 "Biological fluid testing" may include, but is not limited to, urine, blood, breathalyzer, hair
14 follicle testing, or similar drug screening approved by the Board or its designee. Prior to
15 practicing medicine, Respondent shall contract with a laboratory or service approved in advance
16 by the Board or its designee that will conduct random, unannounced, observed, biological fluid
17 testing. The contract shall require results of the tests to be transmitted by the laboratory or service
18 directly to the Board or its designee within four hours of the results becoming available.
19 Respondent shall maintain this laboratory or service contract during the period of probation.

20 A certified copy of any laboratory test result may be received in evidence in any
21 proceedings between the Board and Respondent.

22 If Respondent fails to cooperate in a random biological fluid testing program within the
23 specified time frame, Respondent shall receive a notification from the Board or its designee to
24 immediately cease the practice of medicine. The Respondent shall not resume the practice of
25 medicine until the final decision on an accusation and/or a petition to revoke probation is
26 effective. An accusation and/or petition to revoke probation shall be filed by the Board within 30
27 days of the notification to cease practice. If the Respondent requests a hearing on the accusation
28 and/or petition to revoke probation, the Board shall provide the Respondent with a hearing within

1 30 days of the request, unless the Respondent stipulates to a later hearing. If the case is heard by
2 an Administrative Law Judge alone, he or she shall forward a Proposed Decision to the Board
3 within 15 days of submission of the matter. Within 15 days of receipt by the Board of the
4 Administrative Law Judge's proposed decision, the Board shall issue its Decision, unless good
5 cause can be shown for the delay. If the case is heard by the Board, the Board shall issue its
6 decision within 15 days of submission of the case, unless good cause can be shown for the delay.
7 Good cause includes, but is not limited to, non-adoption of the proposed decision, requests for
8 reconsideration, remands and other interlocutory orders issued by the Board. The cessation of
9 practice shall not apply to the reduction of the probationary time period.

10 If the Board does not file an accusation or petition to revoke probation within 15 days of the
11 issuance of the notification to cease practice or does not provide Respondent with a hearing
12 within 30 days of such a request, the notification of cease practice shall be dissolved.

13 4. EDUCATION COURSE. Within 60 calendar days of the effective date of this
14 Decision, and on an annual basis thereafter, Respondent shall submit to the Board or its designee
15 for its prior approval educational program(s) or course(s) which shall not be less than 40 hours
16 per year, for each year of probation. The educational program(s) or course(s) shall be aimed at
17 correcting any areas of deficient practice or knowledge and shall be Category I certified. The
18 educational program(s) or course(s) shall be at Respondent's expense and shall be in addition to
19 the Continuing Medical Education (CME) requirements for renewal of licensure. Following the
20 completion of each course, the Board or its designee may administer an examination to test
21 Respondent's knowledge of the course. Respondent shall provide proof of attendance for 65
22 hours of CME of which 40 hours were in satisfaction of this condition.

23 5. PROFESSIONALISM PROGRAM (ETHICS COURSE). Within 60 calendar days of
24 the effective date of this Decision, Respondent shall enroll in a professionalism program, that
25 meets the requirements of Title 16, California Code of Regulations (CCR) section 1358.1.
26 Respondent shall participate in and successfully complete that program. Respondent shall provide
27 any information and documents that the program may deem pertinent. Respondent shall
28 successfully complete the classroom component of the program not later than six (6) months after

1 Respondent's initial enrollment, and the longitudinal component of the program not later than the
2 time specified by the program, but no later than one (1) year after attending the classroom
3 component. The professionalism program shall be at Respondent's expense and shall be in
4 addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

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

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

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

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

1 Within 60 calendar days of the effective date of this Decision, and continuing throughout
2 probation, Respondent's practice shall be monitored by the approved monitor. Respondent shall
3 make all records available for immediate inspection and copying on the premises by the monitor
4 at all times during business hours and shall retain the records for the entire term of probation. (s)

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

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

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

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

1 7. 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 8. OBEY ALL LAWS. Respondent shall obey all federal, state and local laws, all rules
11 governing the practice of medicine in California and remain in full compliance with any court
12 ordered criminal probation, payments, and other orders.

13 9. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby
14 ordered to reimburse the Board its costs of investigation and enforcement, including, but not
15 limited to, expert review, amended accusations, legal reviews, joint investigations, and subpoena
16 enforcement, as applicable, in the amount of \$1,430 (one thousand four hundred and thirty
17 dollars). Costs shall be payable to the Medical Board of California. Failure to pay such costs shall
18 be considered a violation of probation.

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

21 The filing of bankruptcy by respondent shall not relieve respondent of the responsibility to
22 repay investigation and enforcement costs, including expert review costs (if applicable).

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

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

28 ////

1 11. 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 12. 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 13. 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 program
7 which has been approved by the Board or its designee shall not be considered non-practice and
8 does not relieve Respondent from complying with all the terms and conditions of probation.
9 Practicing medicine in another state of the United States or Federal jurisdiction while on
10 probation with the medical licensing authority of that state or jurisdiction shall not be considered
11 non-practice. A Board-ordered suspension of practice shall not be considered as a period of non-
12 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 14. 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 15. 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 Probation,
5 or an Interim Suspension Order is filed against Respondent during probation, the Board shall have
6 continuing jurisdiction until the matter is final, and the period of probation shall be extended until
7 the matter is final.

8 16. 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 or her license.
11 The 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 17. 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 18. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for a
24 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 Accusation No. 800-2018-041214 shall be deemed to be true, correct, and admitted by
27 Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or
28 restrict license.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Kevin C. Murphy, Esq. 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.

8 DATED: 1/20/12

CHRISTOPHER ROBERT DOBSON, M.D.
Respondent

10. I have read and fully discussed with Respondent Christopher Robert Dobson, M.D. the
11. terms and conditions and other matters contained in the above Stipulated Settlement and
12. Disciplinary Order. I approve its form and content.

13 DATED:

KEVIN C. MURPHY, ESQ.
Attorney for Respondent

ENDORSEMENT

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

19 DATED:

Respectfully submitted,

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

GIORGIO F. MEJIA
Deputy Attorney General
Attorney for Complainant

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ACCEPTANCE

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

8 DATED: _____
9 **CHRISTOPHER ROBERT DOBSON, M.D.**
Respondent

10 I have read and fully discussed with Respondent Christopher Robert Dobson, M.D. the
11 terms and conditions and other matters contained in the above Stipulated Settlement and
12 Disciplinary Order. I approve its form and content.

13: DATED: 1/20/22 KC ~~KEVIN C. MURPHY, ESQ.~~

ENDORSEMENT

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

19. DATED: _____ Respectfully submitted,
20. ROB BONTA
21. Attorney General of California
22. MATTHEW M. DAVIS
Supervising Deputy Attorney General

GIOVANNI F. MEJIA
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 800-2018-041214

1 XAVIER BECERRA
2 Attorney General of California
3 MATTHEW M. DAVIS
4 Supervising Deputy Attorney General
5 GIOVANNI F. MEJIA
6 Deputy Attorney General
7 State Bar No. 309951
8 600 West Broadway, Suite 1800
9 San Diego, CA 92101
10 P.O. Box 85266
11 San Diego, CA 92186-5266
12 Telephone: (619) 738-9072
13 Facsimile: (619) 645-2061

Attorneys for Complainant

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

13 In the Matter of the Accusation Against: Case No. 800-2018-041214

14 Christopher Robert Dobson, M.D.
4510 Executive Dr., Ste. 107
15 San Diego, CA 92121-3022

16 Physician's and Surgeon's Certificate
No. A 138370,

Respondent.

PARTIES

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

2. On or about September 22, 2015, the Medical Board issued Physician's and Surgeon's Certificate No. A 138370 to Christopher Robert Dobson, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought herein and will expire on August 31, 2021, unless renewed.

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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, subdivision (a) of the Code states:

6 A licensee whose matter has been heard by an administrative law judge of the
7 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
13 monitoring upon order of the board.

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

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

17 5. Section 2234, subdivisions (a) through (c) of the Code state:

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

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

22 (b) Gross negligence.

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

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

29 (2) When the standard of care requires a change in the diagnosis, act, or
30 omission that constitutes the negligent act described in paragraph (1), including, but
31 not limited to, a reevaluation of the diagnosis or a change in treatment, and the

1 licensee's conduct departs from the applicable standard of care, each departure
2 constitutes a separate and distinct breach of the standard of care.

3 6. At all times relevant to the acts or omissions alleged in the instant Accusation up to
4 and including December 31, 2019, section 2234, subdivision (h) of the Code stated:

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

7 ...
8 (h) The repeated failure by a certificate holder, in the absence of good cause, to
9 attend and participate in an interview by the board. This subdivision shall only apply
to a certificate holder who is the subject of an investigation by the board.

10 7. Effective January 1, 2020, section 2234, subdivision (h) of the Code was relettered
11 subdivision (g) and amended to state:

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

14 ...
15 (g) The failure by a certificate holder, in the absence of good cause, to attend
16 and participate in an interview by the board. This subdivision shall only apply to a
certificate holder who is the subject of an investigation by the board.

17 8. Section 2238 of the Code states:

18 A violation of any federal statute or federal regulation or any of the statutes or
19 regulations of this state regulating dangerous drugs or controlled substances
constitutes unprofessional conduct.

20 9. Unprofessional conduct under Business and Professions Code section 2234 is conduct
21 that breaches the rules or ethical code of a profession or conduct which is unbecoming a member
22 in good standing of a profession, and which indicates an unfitness to practice medicine. (*Shea v.*
23 *Bd. of Medical Examiners* (1978) 81 Cal.App.3d 564, 574-75.)

24 **FIRST CAUSE FOR DISCIPLINE**

25 (Gross Negligence)

26 10. Respondent has subjected his Physician's and Surgeon's Certificate No. A 138370 to
27 disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (b), of
28 the Code, in that he committed gross negligence. The circumstances are as follows:

1 11. On or about February 21, 2018, Respondent was driving in or around Encinitas,
2 California. Respondent had in his possession plastic bags with loose pills containing controlled
3 substances including, but not limited to, benzodiazepines, opiates, stimulants, or any combination
4 thereof.

5 12. The plastic bags with the loose controlled substance pills were not appropriately
6 packaged or labeled for patient use, nor did Respondent hold any valid prescription for such pills.

7 13. At approximately 11:37 a.m., San Diego County Sheriff's Department (Sheriff's
8 Department) peace officers conducted a traffic stop on Respondent's vehicle.

9 14. During the course of the traffic stop, Respondent consented to a search of his vehicle.
10 The search uncovered the multiple plastic bags containing the loose controlled substance pills.

11 15. A Sheriff's Department Deputy Sheriff identified the pills to include, but not be
12 limited to, approximately 12 Ecstasy¹ pills, 76 Xanax² pills and 28 oxycodone³ pills.

13 16. The pills identified by the Deputy Sheriff as Ecstasy subsequently tested
14 presumptively positive for the presence of methamphetamine.⁴

15 17. The Board opened an investigation regarding Respondent.

16 18. On or about May 17, 2018, a Board investigator mailed Respondent a letter
17 requesting that Respondent attend and participate in an interview.

18 19. On or about May 25, 2018, the Board investigator received a letter from Respondent
19 via facsimile. Among other things, Respondent's letter stated that he had received the
20 investigator's letter on May 22, 2018. Respondent's letter further stated:

21 I am taking this matter very seriously and intend to fully cooperate with the
22 board and your investigation.

23

¹ Ecstasy is 3,4-Methylene-dioxyamphetamine, a Schedule I controlled substance pursuant
24 to Health and Safety Code section 11054, subdivision (d).

25 ² Xanax is a brand name for alprazolam, a benzodiazepine and Schedule IV controlled
26 substance pursuant to Health and Safety Code section 11057, subdivision (d), and a dangerous
27 drug pursuant to Business and Professions Code section 4022.

28 ³ Oxycodone is a Schedule II controlled substance pursuant to Health and Safety Code
28 section 11055, subdivision (b), and a dangerous drug pursuant to Business and Professions Code
section 4022.

28 ⁴ Methamphetamine is a Schedule II controlled substance pursuant to Health and Safety
Code section 11055, subdivision (d).

1 Due to my personal, professional and financial situation at this point I am
2 requesting a brief amount of additional time so that I may organize my schedule,
3 lodging, and travel arrangements. I anticipate doing so by Thursday, May 31st.

4 20. In subsequent communications, the Board investigator further requested that
5 Respondent voluntarily submit to a medical examination.

6 21. Respondent ultimately refused to attend and participate in an interview with the
7 Board investigator, or voluntarily submit to medical examination.

8 22. On or about November 20, 2019, the Board issued an order compelling a medical
9 examination of Respondent. Respondent subsequently complied with the order.

10 23. On or about December 1, 2020, the Board investigator mailed to Respondent a letter
11 again requesting that Respondent attend and participate in an interview, in this instance by
12 telephone.

13 24. On or about December 17, 2020, Respondent, by his attorney, advised that
14 Respondent "is unwilling to attend a live telephonic interview with [the Board investigator] at this
15 time...."

16 25. To date, Respondent has failed to attend and participate in any interview requested by
17 the Board investigator.

18 26. Respondent has committed gross negligence including, but not limited to:

- 19 (a) Possessing controlled substances without a valid prescription;
- 20 (b) Refusing to cooperate with a Medical Board investigation.

SECOND CAUSE FOR DISCIPLINE

21 (Repeated Negligent Acts)

22 27. Respondent has further subjected his Physician's and Surgeon's Certificate
23 No. A 138370 to disciplinary action under sections 2227 and 2234, as defined by section 2234,
24 subdivision (c), of the Code in that he committed repeated negligent acts as more particularly
25 alleged in paragraphs 10 through 26, above, which are hereby incorporated by reference as if fully
26 set forth herein.

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THIRD CAUSE FOR DISCIPLINE

**(Violating One or More Statutes or Regulations Regulating Dangerous Drugs
or Controlled Substances)**

4 28. Respondent has further subjected his Physician's and Surgeon's Certificate
5 No. A 138370 to disciplinary action under sections 2227 and 2234, as defined by section 2238, of
6 the Code in that he violated one or more statutes or regulations regulating dangerous drugs or
7 controlled substances including, but not limited to, Health and Safety Code sections 11350,
8 subdivision (a), 11377, subdivision (a), 11375, subdivision (b), paragraph (2), or any combination
9 thereof as more particularly alleged in paragraphs 11 through 16, above, which are hereby
10 incorporated by reference as if fully set forth herein.

FOURTH CAUSE FOR DISCIPLINE

(Failure to Attend and Participate in an Interview by the Board)

13 29. Respondent has further subjected his Physician's and Surgeon's Certificate
14 No. A 138370 to disciplinary action under sections 2227 and 2234, as defined by section 2234,
15 subdivision (g) of the Code, in that he failed, in the absence of good cause, to attend and
16 participate in an interview by the Board as more particularly alleged in paragraphs 17 through 25,
17 above, which are hereby incorporated by reference as if fully set forth herein.

FIFTH CAUSE FOR DISCIPLINE

'(Unprofessional Conduct)

20 30. Respondent has further subjected his Physician's and Surgeon's Certificate
21 No. A 138370 to disciplinary action under sections 2227 and 2234 of the Code in that he engaged
22 in conduct that breaches the rules or ethical code of the medical profession or conduct that was
23 unbecoming to a member in good standing of the medical profession, and that demonstrated an
24 unfitness to practice medicine, as more particularly alleged in paragraphs 11 through 25, above,
25 which are hereby incorporated by reference as if fully set forth herein.

26 | *||||*

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SIXTH CAUSE FOR DISCIPLINE

(Violation of the Medical Practice Act)

3 31. Respondent has further subjected his Physician's and Surgeon's Certificate
4 No. A-138370 to disciplinary action under sections 2227 and 2234, as defined by section 2234,
5 subdivision (a) of the Code, in that he violated or attempted to violate, directly or indirectly,
6 assisted in or abetted the violation of, or conspired to violate any provision of the Medical
7 Practice Act as more particularly alleged in paragraphs 10 through 30, above, which are hereby
8 incorporated by reference as if fully set forth herein.

PRAYER

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

- 12 1. Revoking or suspending Physician's and Surgeon's Certificate No. A 138370, issued
13 to Respondent Christopher Robert Dobson, M.D.;
- 14 2. Revoking, suspending or denying approval of Respondent Christopher Robert
15 Dobson, M.D.'s authority to supervise physician assistants and advanced practice nurses;
- 16 3. Ordering Respondent Christopher Robert Dobson, M.D., if placed on probation, to
17 pay the Board the costs of probation monitoring; and
- 18 4. Taking such other and further action as deemed necessary and proper.

DATED: FEB 11 2021

WILLIAM PRASIPKA
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant