

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

In the Matter of the Accusation  
Against:

Barry Joel Brock, M.D.

Physician's and Surgeon's  
Certificate No. G 36218

Respondent.

Case No. 800-2022-091409

**DECISION**

The attached Stipulated Surrender of License and Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on JUN 12 2025.

IT IS SO ORDERED JUN 05 2025.

MEDICAL BOARD OF CALIFORNIA



Reji Varghese  
Executive Director

1 ROB BONTA  
2 Attorney General of California  
3 EDWARD KIM  
4 Supervising Deputy Attorney General  
5 TRINA L. SAUNDERS  
6 Deputy Attorney General  
7 State Bar No. 207764  
8 300 So. Spring Street, Suite 1702  
9 Los Angeles, CA 90013  
10 Telephone: (213) 269-6516  
11 Facsimile: (916) 731-2117  
12 E-mail: Trina.Saunders@doj.ca.gov  
13 *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 Against:

Case No. 800-2022-091409

**BARRY JOEL BROCK, M.D.**  
**13325 Valley Vista Boulevard**  
**Sherman Oaks, California 91423-4362**

OAH No. 2024110726

Physician's and Surgeon's Certificate No.  
G 36218

**STIPULATED SURRENDER OF**  
**LICENSE AND 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 Trina L. Saunders, Deputy Attorney General.

2. Barry Joel Brock, M.D. (Respondent) is represented in this proceeding by attorney Tracy Green, Esq. , whose address is 800 West Sixth Street, Suite 500, Los Angeles, CA 90017-2708.

3. On or about April 11, 1978, the Board issued Physician's and Surgeon's Certificate No. G 36218 to Respondent. That license was in full force and effect at all times relevant to the

1 charges brought in Accusation No. 800-2022-091409 and will expire on May 31, 2025, unless  
2 renewed.

3 **JURISDICTION**

4 4. Accusation No. 800-2022-091409 was filed before the Board and is currently pending  
5 against Respondent. The Accusation and all other statutorily required documents were properly  
6 served on Respondent on September 23, 2024. Respondent timely filed his Notice of Defense  
7 contesting the Accusation. A copy of Accusation No. 800-2022-091409 is attached as Exhibit A  
8 and incorporated by reference.

9 **ADVISEMENT AND WAIVERS**

10 5. Respondent has carefully read, fully discussed with counsel, and understands the  
11 charges and allegations in Accusation No. 800-2022-091409. Respondent also has carefully read,  
12 fully discussed with counsel, and understands the effects of this Stipulated Surrender of License  
13 and Order.

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

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

22 **CULPABILITY**

23 8. Respondent understands that the charges and allegations in Accusation No. 800-2022-  
24 091409, if proven at a hearing, constitute cause for imposing discipline upon his Physician's and  
25 Surgeon's Certificate.

26 9. For the purpose of resolving the Accusation without the expense and uncertainty of  
27 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual  
28 basis for the charges in the Accusation and that those charges constitute cause for discipline.

1 Respondent hereby gives up his right to contest that cause for discipline exists based on those  
2 charges.

3 10. Respondent understands that by signing this stipulation he enables the Board to issue  
4 an order accepting the surrender of his Physician's and Surgeon's Certificate without further  
5 process. Respondent agrees that his Physician's and Surgeon's Certificate No. G 36218 is subject  
6 to discipline and he agrees to be bound by the Board's imposition of discipline as set forth in the  
7 Disciplinary Order below.

8 **RESERVATION**

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

13 **CONTINGENCY**

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

17 13. Respondent understands that, by signing this stipulation, he enables the Executive  
18 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his  
19 Physician's and Surgeon's Certificate No. G 36218 without further notice to, or opportunity to be  
20 heard by, Respondent.

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

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

**WAIVER OF RIGHT TO APPLY FOR REINSTATEMENT OF  
MEDICAL LICENSE IN CALIFORNIA**

21       16. Respondent submits that he has retired from the practice of medicine and hereby fully  
22 agrees to waive his right to apply for reinstatement of his Physician and Surgeon's Certificate No.  
23 G 36218, for the remainder of his life. Respondent also waives his right to apply for a new  
24 Physician and Surgeon's Certificate in the State of California, for the remainder of his life.

## **ADDITIONAL PROVISIONS**

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

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

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

## ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G 36218, issued to Respondent Barry Joel Brock, M.D., is surrendered and accepted by the Board.

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

2. Respondent shall lose all rights and privileges as a physician and surgeon in California as of the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board his pocket license and, if one was issued, his wall certificate on or before the effective date of the Decision and Order.

4. If Respondent's lifetime waiver of his ability to reinstate or apply for licensure is ever deemed unenforceable by a court of competent jurisdiction, and if Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked or surrendered license in effect at the time the application or petition is filed, and all of the charges and allegations contained in Accusation No. 800-2022-091409 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the application or petition.

5. Respondent shall pay the agency its costs of investigation and enforcement in the amount of \$27,094.25 prior to issuance of a new or reinstated license.

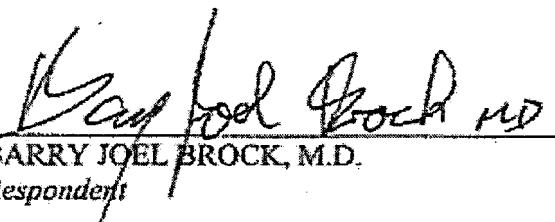
6. If Respondent should ever apply or reapply for a new license or certification, or

1 petition for reinstatement of a license, by any other health care licensing agency in the State of  
2 California, all of the charges and allegations contained in Accusation No. 800-2022-091409 shall  
3 be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
4 Issues or any other proceeding seeking to deny or restrict licensure.

5 **ACCEPTANCE**

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

11 DATED: 5/27/2015

12   
13 BARRY JOEL BROCK, M.D.  
14 Respondent

15 I have read and fully discussed with Respondent Barry Joel Brock, M.D. the terms and  
16 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
17 approve its form and content.

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

19 TRACY GREEN  
20 Attorney for Respondent  
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2 California, all of the charges and allegations contained in Accusation No. 800-2022-091409 shall  
3 be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
4 Issues or any other proceeding seeking to deny or restrict licensure.

5 **ACCEPTANCE**

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

11

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

13 BARRY JOEL BROCK, M.D.  
14 *Respondent*

15

16 I have read and fully discussed with Respondent Barry Joel Brock, M.D. the terms and  
17 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
18 approve its form and content.

19

20 DATED: May 27, 2025

21   
22 TRACY GREEN  
23 *Attorney for Respondent*

24

25 *///*

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## **ENDORSEMENT**

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

DATED: May 27, 2025

Respectfully submitted,

ROB BONTA  
Attorney General of California  
EDWARD KIM  
Supervising Deputy Attorney General

*Trina L. Saunders*  
TRINA L. SAUNDERS  
Deputy Attorney General  
Attorneys for Complainant

LA2024603131  
Stipulated Surrender of License and Order - MBC.docx

**Exhibit A**

**Accusation No. 800-2022-091409**

1 ROB BONTA  
2 Attorney General of California  
3 EDWARD KIM  
4 Supervising Deputy Attorney General  
5 TRINA L. SAUNDERS  
6 Deputy Attorney General  
State Bar No. 207764  
300 So. Spring Street, Suite 1702  
Los Angeles, CA 90013  
Telephone: (213) 269-6516  
Facsimile: (916) 731-2117  
*Attorneys for Complainant*

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

11 In the Matter of the Accusation Against: Case No. 800-2022-091409  
12  
13 **BARRY JOEL BROCK, M.D.** ACCUSATION  
14 **150 North Robertson Blvd., Suite 200**  
15 **Beverly Hills, CA 90211-2144**  
16 Physician's and Surgeon's Certificate  
No. G 36218, Respondent.

## PARTIES

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

21       2. On or about April 11, 1978, the Board issued Physician's and Surgeon's Certificate  
22 Number G 36218 to Barry Joel Brock, M.D. (Respondent). The Physician's and Surgeon's  
23 Certificate was in full force and effect at all times relevant to the charges brought herein and will  
24 expire on May 31, 2025, unless renewed.

25      ///  
26      ///  
27      ///  
28

## **JURISDICTION**

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

4. Section 2004 of the Code states:

The board shall have the responsibility for the following:

(a) The enforcement of the disciplinary and criminal provisions of the Medical Practice Act.

(b) The administration and hearing of disciplinary actions.

(c) Carrying out disciplinary actions appropriate to findings made by a panel or an administrative law judge.

(d) Suspending, revoking, or otherwise limiting certificates after the conclusion of disciplinary actions. . .

(e) Reviewing the quality of medical practice carried out by physician and surgeon certificate holders under the jurisdiction of the board.

(f) Approving undergraduate and graduate medical education programs.

(g) Approving clinical clerkship and special programs and hospitals for the programs in subdivision (f).

(h) Issuing licenses and certificates under the board's jurisdiction.

(i) Administering the board's continuing medical education program.

5. Section 2227 of the Code states:

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

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

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

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

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

(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.

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

## **STATUORY PROVISIONS**

6. Section 2234 of the Code states:

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

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

(b) Gross negligence.

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

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

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

(d) Incompetence.

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

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

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

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

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

7. Section 2266 of the Code states:

The failure of a physician and surgeon to maintain adequate and accurate records relating to the provision of services to their patients constitutes unprofessional conduct.

## **COST RECOVERY**

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

## **FIRST CAUSE FOR DISCIPLINE**

### **(Repeated Negligent Acts)**

9. Respondent Barry Joel Brock, M.D., is subject to disciplinary action under section 2234, subdivision (c), of the Code, in that he committed repeated negligent acts in connection with his care and treatment of Patient A<sup>1</sup>. The circumstances are as follows:

10. For all times relevant herein, Barry Joel Brock, M.D., was an obstetrician/gynecologist; he failed to appropriately treat Patient A in his office, and failed to provide appropriate follow-up care to Patient A.

11. In or around 2010, Patient A, a 47-year-old female, first presented to Respondent. She had type 1 diabetes and Hashimoto's disease<sup>2</sup>.

12. On or about April 21, 2015, Patient A saw Respondent for a consult regarding getting pregnant. During subsequent visits with Patient A in or around 2015, Respondent conducted ultrasounds and performed an HSG, and pelvic ultrasounds, and well woman visits, among other things.

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<sup>1</sup> The Patient is referred to by the letter A to protect her identity.

<sup>2</sup> Hashimoto's disease is an autoimmune disorder that can cause hypothyroidism, or an underactive thyroid.

1           13. On or about September 4, 2015, Respondent conducted a well woman exam on  
2           Patient A.

3           14. On or about July 17, 2017, Patient A again presented to Respondent for an  
4           examination.

5           15. On or about August 8, 2017, Respondent saw Patient A for a pre-operative visit prior  
6           to performing a dilation and curettage (“D&C”)<sup>3</sup>, to treat her endometrial polyps and  
7           metrorrhagia.<sup>4</sup>

8           16. In or around July of 2018, Patient A’s infertility specialist referred her to see  
9           Respondent for continued care after she underwent In Vitro Fertilization (“IVF”) treatment.

10          17. On or about August 31, 2018, an ultrasound was performed in Respondent’s office. It  
11          confirmed a blighted ovum. Patient A should have been 7.4 weeks pregnant based on the IVF  
12          cycle, but only a sac was seen. No pelvic exam was conducted by Respondent at that time.

13          18. On or about September 13, 2018, Respondent performed a repeat ultrasound on  
14          Patient A which confirmed a blighted ovum<sup>5</sup>, missed abortion. Respondent then provided  
15          Patient A with treatment options. Patient A decided to undergo a D&C in Respondent’s office.

16          19. On or about September 17, 2018, the day prior to the D&C, Respondent brought  
17          Patient A in for placement of laminaria.<sup>6</sup> Patient A alleged that Respondent had her get undressed  
18          in front of him, did not wear gloves, and that there was no chaperone in the room.

19          20. On or about September 18, 2018, Respondent performed a suction D&C in his office.  
20          There was no chaperone present. Patient A reported that Respondent did not wear gloves during  
21          the procedure. Patient A felt severe pain during the procedure because Respondent did not  
22          administer enough pain medication to provide adequate anesthesia. Respondent did not perform a  
23          sharp curette, only a suction curette during the surgery. Patient A did not sign any informed  
24          consent documents prior to the procedure and the documentation related to the procedure was  
25

26          <sup>3</sup> A D&C is a surgical procedure in which the cervix is dilated so that the uterine lining  
27          can be scraped with a spoon shaped instrument called a curette, to remove abnormal tissues.

27          <sup>4</sup> Metrorrhagia is abnormal bleeding between menstrual cycles.

27          <sup>5</sup> An empty gestational sac will not turn into an embryo or baby.

28          <sup>6</sup> Laminaria are sterilized dried sticks of seaweed that absorb fluid from the cervix and  
28          slowly expand to dilate the cervix.

1 minimal. No follow up appointment was scheduled for Patient A and she did not receive a phone  
2 call to discuss the pathology following the surgery.

3 21. For the two-month period following the procedure, Patient A continued to experience  
4 vaginal bleeding.

5 22. On or about November 14, 2018, Patient A presented to a physician's assistant. An  
6 endometrial biopsy and ultrasound were performed. They confirmed that Patient A had retained  
7 products of conception.

8 23. On or about November 28, 2018, Patient A underwent another suction D&C  
9 procedure to remove the remaining products of conception.

10 24. In or around 2020, Patient A underwent IVF treatment again. The treatment resulted  
11 in her giving birth to twins in a premature delivery at 32 weeks. It required a cesarean  
12 hysterectomy due to a placenta increta and severe hemorrhaging.

13 25. Respondent was negligent in his care of Patient A in that he:

14 A. Failed to administer to her enough pain medication to prevent her from being in  
15 pain during an in-office procedure on or about September 18, 2018;

16 B. Failed to remove all of the products of conception during the suction D&C  
17 performed on or about September 18, 2018;

18 C. Failed to follow-up with the pathology from the suction D&C performed on or  
19 about September 18, 2018, and did and not maintain the pathology report in the patient's chart;  
20 and

21 D. Failed to maintain complete and accurate documentation related to office visits  
22 and failed to obtain appropriate informed consent.

23 **SECOND CAUSE FOR DISCIPLINE**

24 **(Failure to Maintain Adequate Records)**

25 26. Respondent Barry Joel Brock, M.D., is subject to disciplinary action under Business  
26 and Professions Code section 2266 in that he failed to maintain adequate and accurate records in  
27 connection with his care and treatment of Patient A. The circumstances are as follows:

28

1       27. The facts and allegations set forth in the First Cause for Discipline are incorporated  
2 herein by reference as if fully set forth.

3           28. Respondent failed to adequately and accurately document pertinent and required  
4 information related to the care and treatment of Patient A.

5 29. Respondent failed to obtain the appropriate informed consent for the D&C procedure.

## PRAYER

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

9       1.    Revoking or suspending Physician's and Surgeon's Certificate Number G 36218,  
10 issued to Respondent Barry Joel Brock, M.D.;

11       2. Revoking, suspending or denying approval of Respondent Barry Joel Brock, M.D.'s  
12 authority to supervise physician assistants and advanced practice nurses;

13       3. Ordering Respondent Barry Joel Brock, M.D., to pay the Board the costs of the  
14 investigation and enforcement of this case, and if placed on probation, the costs of probation  
15 monitoring, and

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

18 DATED: SEP 23 2024

JENNA JONES FOR  
REJI VARGHESE  
Executive Director  
Medical Board of California  
Department of Consumer Affairs  
State of California  
*Complainant*

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