

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

In the Matter of the Accusation Against:

**Edward Ray Verde, M.D.**

**Physician's and Surgeon's  
Certificate No. G 68778**

**Case No. 800-2021-082484**

**Respondent.**

**DECISION**

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

**This Decision shall become effective at 5:00 p.m. on July 22, 2025.**

**IT IS SO ORDERED July 15, 2025.**

**MEDICAL BOARD OF CALIFORNIA**



**Reji Varghese, Executive Director**

ROB BONTA  
Attorney General of California  
EDWARD KIM  
Supervising Deputy Attorney General  
TRINA L. SAUNDERS  
Deputy Attorney General  
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*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. 800-2021-082484

12 EDWARD RAY VERDE, M.D.  
13 Loma Linda Veterans Hospital 116A  
11201 Benton Street  
Loma Linda, CA 92357-0001

OAH No. 2025030348

14 Physician's and Surgeon's Certificate No. G  
15 68778

**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

22       1. Reji Varghese (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 Trina L. Saunders, Deputy  
25 Attorney General.

26       2. Edward Ray Verde, M.D. (Respondent) is represented in this proceeding by attorney  
27 Robert H. Ziprick, whose address is 1233 Brookside Ave. Ste A, Redlands, California 92373.

28 3. On or about June 11, 1990, the Board issued Physician's and Surgeon's Certificate

1 No. G 68778 to Respondent. That license was in full force and effect at all times relevant to the  
2 charges brought in Accusation No. 800-2021-082484 and expired on October 31, 2021, and has  
3 not been renewed.

4 **JURISDICTION**

5 4. Accusation No. 800-2021-082484 was filed before the Board and is currently pending  
6 against Respondent. The Accusation and all other statutorily required documents were properly  
7 served on Respondent on October 1, 2024. Respondent timely filed his Notice of Defense  
8 contesting the Accusation. A copy of Accusation No. 800-2021-082484 is attached as Exhibit A  
9 and incorporated by reference.

10 **ADVISEMENT AND WAIVERS**

11 5. Respondent has carefully read, fully discussed with counsel, and understands the  
12 charges and allegations in Accusation No. 800-2021-082484. Respondent also has carefully read,  
13 fully discussed with counsel, and understands the effects of this Stipulated Surrender of License  
14 and Order.

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

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

23 **CULPABILITY**

24 8. Respondent understands that the charges and allegations in Accusation No. 800-2021-  
25 082484, if proven at a hearing, constitute cause for imposing discipline upon his Physician's and  
26 Surgeon's Certificate.

27 9. For the purpose of resolving the Accusation without the expense and uncertainty of  
28 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual

1 basis for the charges in the Accusation and that those charges constitute cause for discipline.  
2 Respondent hereby gives up his right to contest that cause for discipline exists based on those  
3 charges.

4       10. Respondent understands that by signing this stipulation he enables the Board to issue  
5 an order accepting the surrender of his Physician's and Surgeon's Certificate without further  
6 process. Respondent agrees that his Physician's and Surgeon's Certificate No. G 68778 is subject  
7 to discipline and he agrees to be bound by the Board's imposition of discipline as set forth in the  
8 Disciplinary Order below.

## **CONTINGENCY**

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

13        12. Respondent understands that, by signing this stipulation, he enables the Executive  
14 Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his  
15 Physician's and Surgeon's Certificate No. G 68778 without further notice to, or opportunity to be  
16 heard by, Respondent.

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

25        14. The parties agree that this Stipulated Surrender of License and Disciplinary Order  
26 shall be null and void and not binding upon the parties unless approved and adopted by the  
27 Executive Director on behalf of the Board, except for this paragraph, which shall remain in full  
28 force and effect. Respondent fully understands and agrees that in deciding whether or not to

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

15 **ADDITIONAL PROVISIONS**

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

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

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

25 **ORDER**

26 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G 68778, issued  
27 to Respondent Edward Ray Verde, M.D., is surrendered and accepted by the Board.

28 1. The surrender of Respondent's Physician's and Surgeon's Certificate and the

1 acceptance of the surrendered license by the Board shall constitute the imposition of discipline  
2 against Respondent. This stipulation constitutes a record of the discipline and shall become a part  
3 of Respondent's license history with the Board.

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

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

8       4. If Respondent ever files an application for licensure or a petition for reinstatement in  
9 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
10 comply with all the laws, regulations and procedures for reinstatement of a revoked or  
11 surrendered license in effect at the time the application or petition is filed, and all of the charges  
12 and allegations contained in Accusation No. 800-2021-082484 shall be deemed to be true, correct  
13 and admitted by Respondent when the Board determines whether to grant or deny the application  
14 or petition.

15       5. Respondent shall pay the agency its costs of investigation and enforcement in the  
16 amount of \$47,002.00 prior to issuance of a new or reinstated license.

17       6. If Respondent should ever apply or reapply for a new license or certification, or  
18 petition for reinstatement of a license, by any other health care licensing agency in the State of  
19 California, all of the charges and allegations contained in Accusation No. 800-2021-082484 shall  
20 be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
21 Issues or any other proceeding seeking to deny or restrict licensure.

22

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24       ///

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## ACCEPTANCE

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

8 DATED: 6/25/2025 Edward R. Verde  
9 EDWARD RAY VERDE, M.D.  
Respondent

EDWARD RAY VERDE, M.D.  
*Respondent*

### *Respondent*

11 I have read and fully discussed with Respondent Edward Ray Verde, M.D. the terms and  
12 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
13 approve its form and content.

14  
15 DATED: 6/25/2025   
16 ROBERT H. ZIRNICK  
*Attorney for Respondent*

## ENDORSEMENT

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

21 DATED: June 25, 2025 Respectfully submitted,  
22  
23 ROB BONTA  
24 Attorney General of California  
EDWARD KIM  
Supervising Deputy Attorney General

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



**Exhibit A**

**Accusation No. 800-2021-082484**

1 ROB BONTA  
2 Attorney General of California  
3 EDWARD KJM  
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 *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. 800-2021-082484  
Edward Ray Verde, M.D. ACCUSATION  
Loma Linda Veterans Hospital I16A  
11201 Benton Street  
Loma Linda, CA 92357-0001  
Physician's and Surgeon's Certificate  
No. G 68778,  
Respondent.

PARTIES

1. Reji Varghese (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 June 11, 1990, the Board issued Physician's and Surgeon's Certificate  
Number G 68778 to Edward Ray Verde, M.D. (Respondent). That Physician's and Surgeon's  
Certificate was in full force and effect at all times relevant to the charges brought herein. The  
license expired on October 31, 2021, and has not been renewed.

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

1 indicated.

2       4. Section 2004 of the Code states:

3           The board shall have the responsibility for the following:

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

6           (b) The administration and hearing of disciplinary actions.

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

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

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

13           (f) Approving undergraduate and graduate medical education programs.

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

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

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

18       5. Section 2220 of the Code states:

19           Except as otherwise provided by law, the board may take action against all  
20           persons guilty of violating this chapter. The board shall enforce and administer this  
21           article as to physician and surgeon certificate holders, including those who hold  
22           certificates that do not permit them to practice medicine, such as, but not limited to,  
23           retired, inactive, or disabled status certificate holders, and the board shall have all the  
24           powers granted in this chapter for these purposes including, but not limited to:

25           (a) Investigating complaints from the public, from other licensees, from health  
26           care facilities, or from the board that a physician and surgeon may be guilty of  
27           unprofessional conduct. The board shall investigate the circumstances underlying a  
28           report received pursuant to Section 805 or 805.01 within 30 days to determine if an  
                 interim suspension order or temporary restraining order should be issued. The board  
                 shall otherwise provide timely disposition of the reports received pursuant to Section  
                 805 and Section 805.01.

29           (b) Investigating the circumstances of practice of any physician and surgeon  
30           where there have been any judgments, settlements, or arbitration awards requiring the  
31           physician and surgeon or his or her professional liability insurer to pay an amount in  
32           damages in excess of a cumulative total of thirty thousand dollars (\$30,000) with  
33           respect to any claim that injury or damage was proximately caused by the physician's  
34           and surgeon's error, negligence, or omission.

35           (c) Investigating the nature and causes of injuries from cases which shall be reported of a

1 high number of judgments, settlements, or arbitration awards against a physician and surgeon.

2 6. Section 2227 of the Code states:

3 (a) A licensee whose matter has been heard by an administrative law judge of  
4 the Medical Quality Hearing Panel as designated in Section 11371 of the Government  
5 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:

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

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

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

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

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

14 (b) Any matter heard pursuant to subdivision (a), except for warning letters,  
15 medical review or advisory conferences, professional competency examinations,  
16 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.

#### STATUTORY PROVISIONS

17 7. Section 2234 of the Code states:

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  
20 conduct includes, but is not limited to, the following:

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

23 (b) Gross negligence.

24 (c) Repeated negligent acts. To be repeated, there must be two or more  
25 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.

26 (1) An initial negligent diagnosis followed by an act or omission medically  
27 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.

8. Section 805.8 of the Code, subdivision (a)(5), states:

“Sexual misconduct” means inappropriate contact or communication of a sexual nature.”

**AMERICAN PSYCHIATRIC ASSOCIATION'S  
PRINCIPLES OF MEDICAL ETHICS (2013)(PME)**

9. PME Section 1.1<sup>1</sup>, states: *A physician shall be dedicated to providing competent medical care with compassion and respect for human dignity and rights.*

A psychiatrist shall not gratify his or her own needs by exploiting the patient. The psychiatrist shall be ever vigilant about the impact that his or her conduct has upon the boundaries of the doctor-patient relationship, and thus upon the wellbeing of the patient. These requirements become particularly important because of the essentially private, highly personal, and sometimes intensely emotional nature of the relationship established with the psychiatrist.

10. PME Section 2.1 states:

*A physician shall uphold the standards of professionalism, be honest in all professional interactions and strive to report physicians deficient in character or competence, or engaging in fraud or deception to appropriate entities.*

<https://www.psychiatry.org/File%20Library/Practice/Ethics%20Documents/principles2013--final.pdf>

The requirement that the physician conduct himself/herself with propriety in his or her profession and in all the actions of his or her life is especially important in the case of the psychiatrist because the patient tends to model his or her behavior after that of his or her psychiatrist by identification. Further, the necessary intensity of the treatment relationship may tend to activate sexual and other needs and fantasies on the part of both patient and psychiatrist, while weakening the objectivity necessary for control. Additionally, the inherent inequality in the doctor-patient relationship may lead to exploitation of the patient. Sexual activity with a current or former patient is unethical.

11. PME Section 2.2 states:

The psychiatrist should diligently guard against exploiting information furnished by the patient and should not use the unique position of power afforded him/her by the psychotherapeutic situation to influence the patient in any way not directly relevant to the treatment goals.

## AMERICAN MEDICAL ASSOCIATION CODE OF MEDICAL ETHICS

12. The American Medical Association Code of Medical Ethics Section 9.1.2<sup>2</sup> states, in pertinent part:

Patients are often accompanied by third parties who play an integral role in the patient-physician relationship, including, but not limited to, spouses or partners, parents, guardians, or surrogates. Sexual or romantic interactions between physicians and third parties such as these may detract from the goals of the patient-physician relationship, exploit the vulnerability of the third party, compromise the physician's ability to make objective judgments about the patient's health care, and ultimately be detrimental to the patient's well-being. Third parties may be deeply involved in the clinical encounter and in medical decision making. The physician interacts and communicates with these individuals and often is in a position to offer them information, advice, and emotional support. The more deeply involved the individual is in the clinical encounter and in medical decision making, the stronger the argument against sexual or romantic contact between the physician and a key third party. Physicians should avoid sexual or romantic relations with any individual whose decisions directly affect the health and welfare of the patient. For these reasons, physicians should refrain from sexual or romantic interactions with key third parties when the interaction would exploit trust, knowledge, influence, or emotions derived from a professional relationship with the third party or could compromise the patient's care.

## **COST RECOVERY**

13. 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

<sup>2</sup> <https://code-medical-ethics.ama-assn.org/ethics-opinions/romantic-or-sexual-relationships-key-third-parties>

1 enforcement of the case, with failure of the licensee to comply subjecting the license to not being  
2 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
3 included in a stipulated settlement.

4 **FIRST CAUSE FOR DISCIPLINE**

5 **(Gross Negligence)**

6 14. Respondent Edward Ray Verde, M.D. is subject to disciplinary action under section  
7 2234, subdivision (b), of the Code in that he committed gross negligence in connection with his  
8 care and treatment of Patient A<sup>3</sup>. The circumstances are as follows:

9 15. In or around 2020, Respondent, a psychiatrist, provided care and treatment to Patient  
10 A, an adult male and his long-time patient (who Respondent had been treating for a least one  
11 decade). Patient A was diagnosed with schizophrenia, paranoid subtype. Respondent treated  
12 Patient A with prescription medications for this disorder<sup>4</sup>.

13 16. During the relevant time period, Patient A was significantly impaired. Patient A's  
14 wife accompanied him to his medical appointments with Respondent. Patient A was unable to  
15 care for himself emotionally and physically and his wife served as his caregiver.

16 17. In or around 2020, Respondent became romantically involved with Patient A's wife.<sup>5</sup>  
17 On or about March 5, 2020, Respondent saw Patient A and noted that Patient A's wife had been  
18 informed that she would need to apply for conservatorship because Patient A was gravely  
19 disabled.

20 18. On or about August 27, 2020, Respondent self-reported his inappropriate relationship  
21 with Patient A's wife to his employer, Loma Linda Veterans Affairs. The facility opened an  
22 investigation into the matter, Patient A was notified about the relationship between Respondent  
23 and Patient A's wife, and Patient A's treatment was transferred to another physician.

24 19. On or about August 31, 2020, Respondent retired from his position at Loma Linda

25 <sup>3</sup> The patient is identified by letter in this Accusation to address privacy concerns.

26 <sup>4</sup> Respondent had been regularly prescribing alprazolam to the patient from in or around  
June of 2017 through in or around May of 2020.

27 <sup>5</sup> Each of Respondent and Patient A's wife have a different recall regarding the timing of  
their romantic relationship. According to Respondent, their romantic relationship began in or  
around 2020. On the other hand, Patient A's wife believes that their romantic involvement began  
in or around late 2019.

1 Veterans Affairs and from the practice of medicine.

2 20. On or about August 28, 2024, an investigator with the Department of Consumer  
3 Affairs interviewed Respondent. During the interview, Respondent admitted to having a sexual  
4 relationship with Patient A's wife.

5 21. During the time Respondent treated Patient A, including, without limitation, in or  
6 around 2019-2020, Respondent had an inappropriate romantic and sexual relationship with  
7 Patient A's wife. Physicians should refrain from sexual or romantic interactions with key third  
8 parties such as Patient A's wife. Sexual contact with these individuals (e.g., Respondent and  
9 Patient A's wife) that occurs concurrent with the patient-physician relationship (Respondent and  
10 Patient A) is an extreme departure from the standard of care. Respondent committed gross  
11 negligence by engaging in a romantic or sexual relationship with a key third party, namely, the  
12 wife of Patient A.

13 **SECOND CAUSE FOR DISCIPLINE**

14 **(General Unprofessional Conduct)**

15 22. Respondent Edward Ray Verde, M.D. is subject to disciplinary action under section  
16 2234 of the Code in that Respondent committed general unprofessional conduct, which breaches  
17 the rules or ethical code of the medical profession or conduct which is unbecoming to a member  
18 in good standing of the medical profession, and which demonstrates an unfitness to practice  
19 medicine. The circumstances are as follows:

20 23. Unprofessional conduct is conduct which breaches rules or ethical codes of a profession  
21 or conduct which is unbecoming a member in good standing of a profession. (*Shea v. Board of*  
22 *Medical Examiners* (1978) 81 Cal.App.3rd 564, 575.).

23 24. Respondent committed unprofessional conduct by engaging in a romantic and sexual  
24 relationship with Patient A's wife.

25 25. The allegations of the First Cause for Discipline, inclusive, are incorporated herein  
26 by reference as if fully set forth.

27 **PRAYER**

28 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,

1 and that following the hearing, the Medical Board of California issue a decision:

2 1. Revoking or suspending Physician's and Surgeon's Certificate Number G 68778,

3 issued to Respondent Edward Ray Verde, M.D.

4 2. Revoking, suspending or denying approval of Respondent Edward Ray Verde, M.D.'s  
5 authority to supervise physician assistants and advanced practice nurses.

6 3. Ordering Respondent Edward Ray Verde, M.D., to pay the Board the costs of the  
7 investigation and enforcement of this case, and if placed on probation, the costs of probation  
8 monitoring; and

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

10

11

12

DATED: OCT 01 2024

 for

13 REJI VARGHESE  
14 Executive Director  
15 Medical Board of California  
16 Department of Consumer Affairs  
17 State of California  
18 *Complainant*

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