

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

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

Thomas Charles Laipply, M.D.

**Physician's and Surgeon's Certificate
No. G 34086**

Respondent.

Case No. 800-2025-114904

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 December 10, 2025.

IT IS SO ORDERED December 10, 2025.

MEDICAL BOARD OF CALIFORNIA



**Reji Varghese
Executive Director**

1 ROB BONTA
Attorney General of California
2 MICHAEL C. BRUMMEL
Supervising Deputy Attorney General
3 JOHN S. GATSCHE
Deputy Attorney General
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California Department of Justice
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8 *Attorneys for the People*

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

12 In the Matter of the Accusation Against:

Case No. 800-2025-114904

13 **THOMAS CHARLES LAIPPLY, M.D.**
14 **2944 Shirley St.**
West Sacramento, CA 95691

OAH No. 2025120226

15 **Physician's and Surgeon's Certificate**
16 **No. G 34086**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

17 Respondent.

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

21 **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
24 this matter by Rob Bonta, Attorney General of the State of California, by John S. Gatschet,
25 Deputy Attorney General.

26 2. Thomas Charles Laipply, M.D. ("Respondent") is represented in this proceeding by
27 attorney Jackie Sueyres, whose address is: 601 University Ave., Suite 225, Sacramento, CA
28 95825.

3. On or about January 18, 2001, the Board issued Physician's and Surgeon's Certificate No. G 34086 to Respondent. That license was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2025-114904 and will expire on August 31, 2026, unless renewed.

JURISDICTION

4. Accusation No. 800-2025-114904 was filed before the Board and is currently pending against Respondent. The Respondent is waiving proper service of the Accusation and all other statutorily required documents. Further, in addition to Respondent waiving any irregularities in the service of the Accusation and/or any other statutorily required documents, Respondent agrees that by signing this stipulation that the Board has full jurisdiction to act upon Respondent's license. Respondent is waiving his right to file a Notice of Defense to contest the Accusation and wishes to enter into a stipulated surrender of his license. A copy of Accusation No. 800-2025-114904 is attached as Exhibit A and incorporated by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2025-114904. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Order.

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

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

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CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 800-2025-114904, agrees that cause exists for discipline and hereby surrenders his Physician's and Surgeon's Certificate No. G 34086 for the Board's formal acceptance.

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

RESERVATION

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

CONTINGENCY

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

12. Respondent understands that, by signing this stipulation, he enables the Executive Director of the Board to issue an order, on behalf of the Board, accepting the surrender of his Physician's and Surgeon's Certificate No. G 34086 without further notice to, or opportunity to be heard by, Respondent.

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

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

ADDITIONAL PROVISIONS

15. This Stipulated Surrender of License 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.

16. 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.

17. 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 34086, issued to Respondent Thomas Charles Laipply, 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 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 petition is filed, and all of the charges and allegations contained in Accusation No. 800-2025-114904 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. Respondent shall pay the agency its costs of investigation, prosecution and enforcement in the amount of **\$19,457.00** (nineteen thousand, four hundred, fifty-seven dollars and zero cents) prior to the issuance of a new or reinstated license.

6. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 800-2025-114904 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

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ACCEPTANCE

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

DATED: 12/9/2025 | 2:07:14 PM PST

DocuSigned by:
THaipply

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THOMAS CHARLES LAIPPLY, M.D.
Respondent

I have read and fully discussed with Respondent Thomas Charles Laipply, M.D. the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: 12/9/2025

J. Sueyres
Jackie Sueyres
Attorney for Respondent

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: December 9, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California
MICHAEL C. BRUMMEL
Supervising Deputy Attorney General

John S. Gatschet
JOHN S. GATSCHET
Deputy Attorney General
Attorneys for Complainant

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39506321

Exhibit A

Accusation No. 800-2025-114904

1 ROB BONTA
Attorney General of California
2 MICHAEL C. BRUMMEL
Supervising Deputy Attorney General
3 JOHN S. GATSCHET
Deputy Attorney General
4 State Bar No. 244388
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7 E-mail: John.Gatschet@doj.ca.gov

8 *Attorneys for Complainant*

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11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

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13 **Thomas Charles Laipply, M.D.**
2944 Shirley St.
14 West Sacramento, CA 95691

OAH No. 2025120226

A C C U S A T I O N

15 Physician's and Surgeon's Certificate
No. G 34086,

16 Respondent.
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19 **PARTIES**

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

23 2. On or about January 18, 2001, the Medical Board issued Physician's and Surgeon's
24 Certificate Number G 34086 to Thomas Charles Laipply, M.D. ("Respondent"). The Physician's
25 and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
26 herein and will expire on August 31, 2026, unless renewed.

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4. Section 2004 of the Code states, in pertinent part:

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

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

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STATUTORY PROVISIONS

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

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COST RECOVERY

8. Section 125.3 of the Code states:

(a) Except as otherwise provided by law, in any order issued in resolution of a disciplinary proceeding before any board within the department or before the Osteopathic Medical Board, upon request of the entity bringing the proceeding, the administrative law judge may 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.

(b) In the case of a disciplined licensee that is a corporation or a partnership, the order may be made against the licensed corporate entity or licensed partnership.

(c) A certified copy of the actual costs, or a good faith estimate of costs where actual costs are not available, signed by the entity bringing the proceeding or its designated representative shall be prima facie evidence of reasonable costs of investigation and prosecution of the case. The costs shall include the amount of investigative and enforcement costs up to the date of the hearing, including, but not limited to, charges imposed by the Attorney General.

(d) The administrative law judge shall make a proposed finding of the amount of reasonable costs of investigation and prosecution of the case when requested pursuant to subdivision (a). The finding of the administrative law judge with regard to costs shall not be reviewable by the board to increase the cost award. The board may reduce or eliminate the cost award, or remand to the administrative law judge if the proposed decision fails to make a finding on costs requested pursuant to subdivision (a).

(e) If an order for recovery of costs is made and timely payment is not made as directed in the board's decision, the board may enforce the order for repayment in any appropriate court. This right of enforcement shall be in addition to any other rights the board may have as to any licensee to pay costs.

(f) In any action for recovery of costs, proof of the board's decision shall be conclusive proof of the validity of the order of payment and the terms for payment.

(g)(1) Except as provided in paragraph (2), the board shall not renew or reinstate the license of any licensee who has failed to pay all of the costs ordered under this section.

(2) Notwithstanding paragraph (1), the board may, in its discretion, conditionally renew or reinstate for a maximum of one year the license of any licensee who demonstrates financial hardship and who enters into a formal agreement with the board to reimburse the board within that one-year period for the unpaid costs.

(h) All costs recovered under this section shall be considered a reimbursement for costs incurred and shall be deposited in the fund of the board recovering the costs to be available upon appropriation by the Legislature.

(i) Nothing in this section shall preclude a board from including the recovery of the costs of investigation and enforcement of a case in any stipulated settlement.

(j) This section does not apply to any board if a specific statutory provision in

1 that board's licensing act provides for recovery of costs in an administrative
2 disciplinary proceeding.

3 **FACTUAL ALLEGATIONS**

4 9. Between January 2025 and February 2025, the Board received two complaints raising
5 concerns about Respondent's mental status and ability to practice medicine safely. The
6 complaints stated that Respondent has been diagnosed with a severe mental condition which
7 causes neuro-cognitive decline. The complaints also stated that Respondent was prescribing
8 prescription medications to a close family member, who also suffers from a severe mental health
9 condition.

10 10. On September 22, 2025, the Board issued an Order pursuant to Bus. & Prof. Code, §
11 820 ("Order"), that compelled Respondent to undergo a mental health and/or physical
12 examination to determine his ability to safely practice medicine. The Board served the Order on
13 Respondent's address of record. Additionally, the Board served the Order on Respondent's last
14 known mailing address and his last known e-mail address. As of the filing of this Accusation,
15 Respondent has not cooperated with the Board to undergo a mental health and/or physical
16 examination to determine his ability to safely practice medicine.

17 **CAUSE FOR DISCIPLINE**

18 **(Unprofessional Conduct for Failure to Comply with Order of Examination)**

19 11. Respondent Thomas Charles Laipply, M.D.'s license is subject to disciplinary action
20 under sections 820 and 821 of the Code in that he failed to cooperate with the Board to undergo a
21 mental health and/or physical examination to determine his ability to safely practice medicine.
22 The Board realleges paragraphs 9 and 10 as if they were fully set forth herein.

23 12. Based on the failure of Respondent to undergo a mental health and/or physical
24 examination to determine his ability to safely practice medicine Respondent has subjected his
25 license to suspension and/or revocation.

26 **PRAYER**

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

1 1. Revoking or suspending Physician's and Surgeon's Certificate No. G 34086, issued
2 to Respondent Thomas Charles Laipply, M.D.;

3 2. Revoking, suspending or denying approval of Respondent Thomas Charles Laipply,
4 M.D., 's authority to supervise physician assistants and advanced practice nurses;

5 3. Ordering Respondent Thomas Charles Laipply, M.D., to pay the Board the costs of
6 the investigation and enforcement of this case, and if placed on probation, the costs of probation
7 monitoring; and,

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

9
10 DATED: DEC 10 2025


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

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