

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

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

Peter John Bullock, M.D.

**Physician's and Surgeon's
Certificate No. A 31093**

Case No. 800-2021-084362

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 January 28,
2026.**

IT IS SO ORDERED December 29, 2025.

MEDICAL BOARD OF CALIFORNIA

 MD.

**Veling Tsai, Chair
Panel A**

1 ROB BONTA
Attorney General of California
2 GREG W. CHAMBERS
Supervising Deputy Attorney General
3 State Bar No. 237509
4 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-3382
5 Facsimile: (415) 703-1107
E-mail: Greg.Chambers@doj.ca.gov
6 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

12 **PETER JOHN BULLOCK, M.D.**
13 **Arch Street Medical Assoc Inc.**
14 **143 Birch St.**
15 **Redwood City, CA 94062**

16 **Physician's and Surgeon's Certificate**
17 **No. A 31093**

18 Respondent.

Case No. 800-2021-084362

OAH No.

19 **STIPULATED SETTLEMENT AND**
20 **DISCIPLINARY ORDER**

21 In the interest of a prompt and speedy settlement of this matter, consistent with the public
22 interest and the responsibility of the Medical Board of California of the Department of Consumer
23 Affairs, the parties hereby agree to the following Stipulated Settlement and Disciplinary Order
24 which will be submitted to the Board for approval and adoption as the final disposition of the
25 Accusation.

26 **PARTIES**

27 1. Reji Varghese (Complainant) is the Executive Director of the Medical Board of
28 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 Greg W. Chambers,
Supervising Deputy Attorney General.

2. Respondent Peter John Bullock, M.D. (Respondent) is represented in this proceeding by attorney Shannon V. Baker, 765 University Avenue, Sacramento, CA 95825.

3. On or about June 1, 1977, the Board issued Physician's and Surgeon's Certificate No. A 31093 to Respondent. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2021-084362, and will expire on February 28, 2027, unless renewed.

JURISDICTION

4. Accusation No. 800-2021-084362 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on November 14, 2024. Respondent timely filed his Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 800-2021-084362 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2021-084362. Respondent has also carefully read, fully discussed with his counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

7. 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.

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

1 **CULPABILITY**

2 9. Respondent understands and agrees that the charges and allegations in Accusation
3 No. 800-2021-084362, if proven at a hearing, constitute cause for imposing discipline upon his
4 Physician's and Surgeon's Certificate.

5 10. Respondent does not contest that, at an administrative hearing, complainant could
6 establish a prima facie case with respect to the charges and allegations in Accusation No. 800-
7 2021-084362, a true and correct copy of which is attached hereto as Exhibit A, and that he has
8 thereby subjected his Physician's and Surgeon's Certificate, No. A 31093 to disciplinary action.

9 11. Respondent agrees that his Physician's and Surgeon's Certificate is subject to
10 discipline and agrees to be bound by the Board's imposition of discipline as set forth in the
11 Disciplinary Order below.

12 **CONTINGENCY**

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

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

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

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

DISCIPLINARY ORDER

A. PUBLIC REPRIMAND

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 31093 issued to Respondent PETER JOHN BULLOCK, M.D. shall be and hereby is publicly reprimanded pursuant to California Business and Professions Code section 2227, subdivision (a)(4). This public reprimand is issued in connection with Respondent's purported improper prescribing to two patients, as set forth in Accusation 800-2021-084362.

B. PRESCRIBING PRACTICES COURSE

Within 60 calendar days of the effective date of this Decision, Respondent shall enroll in a course in prescribing practices approved in advance by the Board or its designee. Respondent shall provide the approved course provider with any information and documents that the approved course provider may deem pertinent. Respondent shall participate in and successfully complete the classroom component of the course not later than six (6) months after Respondent's initial enrollment. Respondent shall successfully complete any other component of the course within one (1) year of enrollment. The prescribing practices course shall be at Respondent's expense and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

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

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

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ENDORSEMENT

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

DATED: 11/19/2025

Respectfully submitted,

ROB BONTA
Attorney General of California

Greg W. Chambers

GREG W. CHAMBERS
Supervising Deputy Attorney General
Attorneys for Complainant

Exhibit A

Accusation No. 800-2021-084362

1 ROB BONTA
Attorney General of California
2 GREG W. CHAMBERS
Supervising Deputy Attorney General
3 State Bar No. 237509
4 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-3382
5 Facsimile: (415) 703-5480
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10 In the Matter of the Accusation Against:

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11 **Peter John Bullock, M.D.**
12 **Arch Street Medical Association Inc.**
13 **143 Birch St.**
Redwood City, CA 94062

A C C U S A T I O N

14 **Physician's and Surgeon's Certificate**
No. A 31093,

15 Respondent.

16
17 **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 June 1, 1977, the Medical Board issued Physician's and Surgeon's
22 Certificate Number A 31093 to Peter John Bullock, M.D. (Respondent). The Physician's and
23 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
24 herein and will expire on February 28, 2025, unless renewed.

25 **JURISDICTION**

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

1 4. Section 2227 of the Code provides, in part, that a licensee who is found guilty under
2 the Medical Practice Act may have his or her license revoked, suspended for a period not to
3 exceed one year, placed on probation and required to pay the costs of probation monitoring, or
4 such other action taken in relation to discipline as the Board deems proper.

5 5. Section 2234 of the Code states:

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

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

11 “...”

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

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

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

24 “...”

25 **COST RECOVERY**

26 6. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
27 administrative law judge to direct a licensee found to have committed a violation or violations of
28 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and

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 DEFINITIONS

5 7. Alprazolam, known by the trade name Xanax, is a psychotropic triazolo analogue of
6 the 1,4 benzodiazepine class of central nervous system-active compounds. Alprazolam is used for
7 the management of anxiety disorders or for the short-term relief of the symptoms of anxiety. It is
8 a dangerous drug as defined in section 4022 of the Code and a Schedule IV controlled substance
9 and narcotic as defined by section 11057, subdivision (d), of the Health and Safety Code.

10 8. Morphine sulfate is for use in patients who require a potent opioid analgesic for relief
11 of moderate to severe pain. Morphine is a dangerous drug as defined in section 4022 of the Code,
12 and a Schedule II controlled substance and narcotic as defined by section 11055, subdivision
13 (b)(1), of the Health and Safety Code. Morphine can produce drug dependence and has a potential
14 for being abused.

15 9. Naloxone, known by the trade name Narcan, is a narcotic antagonist. It is a dangerous
16 drug as defined in section 4022 of the Code, indicated for complete or partial reversal of narcotic
17 depression, including respiratory depression induced by opioids.

18 10. Norco is a trade name for hydrocodone bitartrate with acetaminophen. Norco tablets
19 contain 10 mg of hydrocodone bitartrate and 350 mg of acetaminophen. Acetaminophen is a non-
20 opiate, non-salicylate analgesic and antipyretic. Hydrocodone bitartrate is a semisynthetic
21 narcotic analgesic and a dangerous drug as defined in section 4022 of the Code. Norco is a
22 Schedule II controlled substance and narcotic as defined by section 11055, subdivision (e), of the
23 Health and Safety Code.

24 11. Oxycodone and acetaminophen is known by the trade name Endocet. Oxycodone is a
25 white odorless crystalline powder derived from the opium alkaloid, thebaine. Oxycodone is a
26 semisynthetic narcotic analgesic with multiple actions qualitatively similar to those of morphine.
27 It is a dangerous drug as defined in section 4022 of the Code and a Schedule II controlled
28

1 substance and narcotic as defined by section 11055, subdivision (b)(1), of the Health and Safety
2 Code.

3 FACTUAL ALLEGATIONS

4 PATIENT 1¹

5 12. In March 2021, Respondent commenced treating Patient 1, a then 56-year-old female
6 with fibromyalgia. Respondent discontinued Patient 1's short acting opioids prescription that had
7 been prescribed by other treatment providers – oxycodone-acetaminophen 5/325 mg, #60, on a
8 monthly basis, which had a MME of 180.² There was no documented discussion regarding the
9 discontinuation of this pharmacological regimen even though Respondent wrote that Patient 1's
10 pain management with morphine commenced in 2003.

11 13. Respondent continued prescribing morphine extended release (ER) 60 mg, #90 - with
12 MME of 180 – to Patient 1 on a monthly basis until at least August 2023. Respondent made no
13 documented attempt to wean Patient 1 from the long-acting opioids (morphine), and only once –
14 on August 1, 2023 – discussed naloxone with Patient 1.

15 14. Respondent did not provide any standard care for fibromyalgia, as chronic narcotics
16 are not a standard of care for fibromyalgia. Patient 1 visited rheumatology in October 2022 for
17 osteoporosis medication, but not for her fibromyalgia. Respondent expressed concern Patient 1's
18 osteoporosis was due to her chronic opioid use, but did not attempt to decrease Patient 1's opioid
19 dosage.

20 PATIENT 2

21 15. On or about January 20, 2017, Patient 2, a then 75-year-old female with a history of
22 chronic obstructive pulmonary disease (COPD) and lower back pain appears to have commenced
23 treatment with Respondent.

24 16. On July 6, 2020, Respondent wrote that Patient 2 had taken Norco 10/325 mg for
25 “chronic low back pain for quite a while.” Documentation indicates Patient 2's CURES and urine

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27 ¹ Patients are identified by number to protect their privacy. Patient identification will be
provided with discovery.

28 ² MME, or Morphine Milligram Equivalents, are values that represent the potency of an
opioid dose relative to morphine.

1 screen were appropriate, and Respondent refilled the Norco. The Norco was filled on July 14,
2 2020. and then never filled again. There is no explanation in the chart about why or how this
3 long-term opioid was stopped.

4 17. From August 16, 2021, to September 29, 2022, Respondent prescribed Alprazolam 1
5 mg, #30, to Patient 2 for anxiety and insomnia. According to documentation, Respondent last saw
6 Patient 2 in November 2020.

7 **FIRST CAUSE FOR DISCIPLINE**

8 **(Unprofessional Conduct – Repeated Negligent Acts – Patient 1)**

9 18. Paragraphs 12 through 14 are incorporated by reference as if fully set forth.

10 19. Respondent Peter John Bullock, M.D. is subject to disciplinary action under sections
11 2234 and 2234(c) of the Code, in that Respondent engaged in repeatedly negligent acts in the care
12 and treatment of Patient 1.

13 **SECOND CAUSE FOR DISCIPLINE**

14 **(Unprofessional Conduct – Repeated Negligent Acts – Patient 2)**

15 20. Paragraphs 15 through 17 are incorporated by reference as if fully set forth.

16 21. Respondent Peter John Bullock, M.D. is subject to disciplinary action under sections
17 2234 and 2234(c) of the Code, in that Respondent engaged in repeatedly negligent acts in the care
18 and treatment of Patient 2.

19 **PRAYER**

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

- 22 1. Revoking or suspending Physician's and Surgeon's Certificate Number A 31093,
23 issued to Respondent Peter John Bullock, M.D.;
- 24 2. Revoking, suspending or denying approval of Respondent Peter John Bullock, M.D.'s
25 authority to supervise physician assistants and advanced practice nurses;
- 26 3. Ordering Respondent Peter John Bullock, M.D., to pay the Board the costs of the
27 investigation and enforcement of this case, and if placed on probation, the costs of probation
28 monitoring; and

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

DATED: NOV 14 2024

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