

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

In the Matter of the Accusation
Against:

Victor Lynn Perry, M.D.

Physician's and Surgeon's
Certificate No. G 86263

Respondent.

Case No. 800-2022-086412

DECISION

The attached Default Decision 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 February 24, 2026.

IT IS SO ORDERED February 12, 2026.

MEDICAL BOARD OF CALIFORNIA

Sharlene Smith For _____

Reji Varghese
Executive Director

1 ROB BONTA
Attorney General of California
2 STEVE DIEHL
Supervising Deputy Attorney General
3 SARAH J. JACOBS
Deputy Attorney General
4 State Bar No. 255899
2550 Mariposa Mall, Room 5090
5 Fresno, CA 93721
Telephone: (559) 705-2320
6 Facsimile: (559) 445-5106
E-mail: Sarah.Jacobs@doj.ca.gov
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

13 **VICTOR LYNN PERRY, M.D.**
14 **6177 N. Thesta St., Suite 103**
Fresno, CA 93710

15 **Physician's and Surgeon's Certificate**
16 **No. G 86263,**

17 Respondent.

Case No. 800-2022-086412

OAH No. 2025040324

**DEFAULT DECISION
AND ORDER**

[Gov. Code, §11520]

18
19 **FINDINGS OF FACT**

20
21 1. On or about February 3, 2025, Complainant Reji Varghese, in his official capacity as
22 the Executive Director of the Medical Board of California, Department of Consumer Affairs, filed
23 Accusation No. 800-2022-086412 against VICTOR LYNN PERRY, M.D. (Respondent) before
24 the Medical Board of California.

25 2. On or about October 12, 2001, the Medical Board of California (Board) issued
26 Physician's and Surgeon's Certificate No. G86263 to Respondent. The Physician's and
27 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
28 herein and expired on June 30, 2025; Respondent failed to pay his license renewal fee, and his

1 license is now delinquent. A certificate of Respondent's licensure is attached as **Exhibit A** in the
2 separate accompanying "Default Decision Evidence Packet."¹

3 3. On or about February 3, 2025, Samuel Guardado, an employee of the Medical Board
4 of California, served by Certified and First Class Mail a copy of the Accusation No. 800-2022-
5 086412, Statement to Respondent, Notice of Defense, Request for Discovery, and Discovery
6 Statutes to Respondent's address of record with the Board, which was and is 6177 N. Thesta St.,
7 Suite 103, Fresno, CA 93710. A copy of the Accusation, the related documents, and Declaration
8 of Service are attached as **Exhibit B**, in the separate accompanying Default Decision Evidence
9 Packet.

10 4. Service of the Accusation was effective as a matter of law under the provisions of
11 Government Code section 11505, subdivision (c).

12 5. On or about February 14, 2025, Respondent's counsel signed and returned a Notice of
13 Defense, requesting a hearing in this matter. Respondent's counsel noted Respondent's mailing
14 address was P.O. Box 8354. Fresno, CA 93747.

15 6. On November 6, 2025, a Notice of Hearing was served by mail at Respondent's
16 address of record, along with his address listed on the Notice of Defense, and it informed
17 Respondent that an administrative hearing in this matter was scheduled for November 17-21,
18 2025. A copy of Respondent's Notice of Defense, the Notice of Hearing, and Declarations of
19 Service are attached hereto as **Exhibit C**, in the separate accompanying Default Decision
20 Evidence Packet.

21 7. On November 17, 2025, Respondent appeared at hearing, which was continued to the
22 following day. On November 18, 2025, Respondent failed to appear at the continued hearing.

23 8. On November 18, 2025, Administrative Law Judge Coren D. Wong made findings
24 and declared that the Respondent was in default for failing to appear at the hearing. A copy of
25

26
27 ¹ The Exhibits referred to herein, which are true and correct copies of the originals, are
28 contained in the separate accompanying "Default Decision Evidence Packet" and are identified as
"Exhibit" followed by the specific exhibit letter. The Default Decision Evidence Packet is hereby
incorporated by reference as if fully set forth herein.

1 Judge Wong's finding of default is attached hereto as **Exhibit D**, in the separate accompanying
2 Default Decision Evidence Packet.

3 9. Government Code section 11506 states, in pertinent part:

4 (c) The respondent shall be entitled to a hearing on the merits if the respondent
5 files a notice of defense, and the notice shall be deemed a specific denial of all parts
6 of the accusation not expressly admitted. Failure to file a notice of defense shall
7 constitute a waiver of respondent's right to a hearing, but the agency in its discretion
8 may nevertheless grant a hearing.

9 10. California Government Code section 11520 states, in pertinent part:

10 (a) If the respondent either fails to file a notice of defense or to appear at the
11 hearing, the agency may take action based upon the respondent's express admissions
12 or upon other evidence and affidavits may be used as evidence without any notice to
13 respondent.

14 11. Business and Professions Code section 125.3 states, in pertinent part:

15 (a) Except as otherwise provided by law, in any order issued in resolution of a
16 disciplinary proceeding before any board within the department or before the
17 osteopathic Medical Board, upon request of the entity bringing the proceeding, the
18 administrative law judge may direct a licensee found to have committed a violation or
19 violations of the licensing act to pay a sum not to exceed the reasonable costs of the
20 investigation and enforcement of the case.

21 12. On or about September 21, 2021, Patient A² had a follow-up office visit with
22 Respondent after he performed her neck surgery. Patient A told Respondent about her sciatic
23 nerve pain and Respondent stated that he could check it. While Patient A was supine on the
24 examination table Respondent pushed on the front groin area and moved his hand in small, half-
25 circular motions. Respondent continued with the same motion and moved down Patient A's
26 groin, inside her thigh, and towards her pubic hair. Respondent was asking questions and
27 repeatedly saying, "It's okay. You're okay. I'm just adjusting." Respondent's hand moved inside
28 Patient A's underwear and went on top of her vagina continuing with the same motion. The
29 Declaration of Patient A is attached as **Exhibit E** in the separate accompanying Default Decision
30 Evidence Packet. A certified copy of the related police reports is attached as **Exhibit F** in the
31 separate accompanying Default Decision Evidence Packet.

² The patient's name is redacted to protect her privacy.

1 13. Patient A suffered from incontinence and was wearing a maxi pad in her underwear.
2 She felt the pad stick to Respondent's hand and could feel him struggling to remove it. Once he
3 removed the pad, he inserted his fingers into her vagina. He was not wearing gloves. Patient A
4 immediately sat up, ending the examination. Patient A's maxi pad was knocked out of place and
5 hanging out of her underwear to the side after the examination. At the front desk, Patient A asked
6 the receptionist for a pen and paper and then wrote, "Dr. Perry just totally violated me," and then
7 handed the note to the receptionist. Declaration of Patient A, **Exhibit E**; Certified Police Reports,
8 **Exhibit F**.

9 14. On April 8, 2024, Fresno police officers obtained cell phone ping coordinates (the
10 latitude and longitude of Respondent's cell phone) and they responded to the location of 446
11 South 2nd St., Kerman, CA, with a search warrant when they obtained Respondent's DNA.
12 Officers wrote in their report,

13 . . . based on Victor Lynn Perry's pattern of life between the years of 2021 to 2024, it
14 is this investigator's belief that Dr. Victor Lynn Perry was being elusive and
15 deceptive with the Fresno Police Department as well as the California Department of
16 Consumer Affairs / Medical Board.

16 Certified Police Reports, **Exhibit F**.

17 15. On October 15, 2024, Parham Yashar, M.D., authored an expert report in this matter
18 opining that Respondent committed sexual misconduct. Declaration and CV of Parham Yashar,
19 M.D., and attached Report dated October 15, 2024, **Exhibit G**.

20 16. Pursuant to its authority under Government Code section 11520, the Board finds
21 Respondent is in default. The Board will take action without further hearing and, based on
22 Respondent's express admissions by way of default and the evidence before it, contained in
23 Exhibits A, B, C, D, E, F, G and H finds that the allegations in Accusation No. 800-2022-086412
24 are true.

25 **DETERMINATION OF ISSUES**

26 1. Based on the foregoing findings of fact, Respondent VICTOR LYNN PERRY, M.D.
27 has subjected his Physician's and Surgeon's Certificate No. G86263 to discipline.

28 ///

1 2. A copy of the Accusation and the related documents and Declaration of Service are
2 attached here as **Exhibit B**.

3 3. The Board has jurisdiction to adjudicate this case by default.

4 4. Pursuant to Business and Professions Code section 125.3, the Board is authorized to
5 order Respondent to pay the Board the reasonable costs of investigation and enforcement of the
6 case prayed for in the Accusation total \$65,926, based on the Certification of Costs attached as
7 **Exhibit H** in the Exhibit Package.

8 5. The Medical Board of California is authorized to revoke Respondent's Physician's
9 and Surgeon's Certificate based upon the following violations alleged in the Accusation:

- 10 a. Respondent engaged in unprofessional conduct and committed sexual
11 exploitation of a patient in violation of Business and Professions Code, section
12 729.
- 13 b. Respondent engaged in unprofessional conduct and committed sexual
14 misconduct with a patient in violation of Business and Professions Code,
15 section 726.
- 16 c. Respondent engaged in unprofessional conduct and gross negligence in
17 violation of Business and Professions Code, section 2234, subdivision (b).

18 ///
19 ///
20 ///
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

IT IS SO ORDERED that Physician's and Surgeon's Certificate No. G86263, heretofore issued to Respondent VICTOR LYNN PERRY, M.D., is revoked. Respondent VICTOR LYNN PERRY, M.D. is ordered to pay the Board the costs of the investigation and enforcement of this case in the amount of \$65,926.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The Board in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on February 24, 2026

It is so ORDERED February 12, 2026


REJI VARHGESE
EXECUTIVE DIRECTOR
FOR THE MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS

FR2024305212
95679777.docx

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attachments:

Exhibit A: Certificate of Respondent's License

Exhibit B: Accusation No. 800-2022-086412, Related Documents, and Declaration of Service

Exhibit C: Notice of Defense, Notice of Hearing dated November 6, 2025, and Declaration of Service

Exhibit D: Administrative Law Judge Coren W. Wong Findings dated November 18, 2025.

Exhibit E: Declaration of Patient A

Exhibit F: Certified Police Reports

Exhibit G: Declaration of Parham Yashar, M.D., CV of Parham Yashar, M.D., and attached report dated October 15, 2024.

Exhibit H: Certifications of Investigation and Prosecution Costs: Declarations of Sarah J. Jacobs and Michel Veverka

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit A

Certificate of Respondent's License



MEDICAL BOARD OF CALIFORNIA

Protecting consumers by advancing high quality, safe medical care.

Enforcement Program
2005 Evergreen Street, Suite 1200
Sacramento, CA 95815-5401
Phone: (916) 263-2525
Fax: (916) 263-2473
www.mbc.ca.gov

Gavin Newsom, Governor, State of California | Business, Consumer Services and Housing Agency | Department of Consumer Affairs

November 7, 2025

TO WHOM IT MAY CONCERN:

I, REJI VARGHESE, Executive Director of the Medical Board of California, do hereby certify that VICTOR LYNN PERRY, M.D., whose address of record is 6177 N THESTA ST. STE 103, FRESNO, CA 93710-8600 was issued Physician's and Surgeon's Certificate Number G 86263 by the Board on October 12, 2001. Said certificate is DELINQUENT.

I further certify that disciplinary action was taken against this certificate as follows: On February 3, 2025, an ACCUSATION was filed against Doctor PERRY, and the matter is still pending.

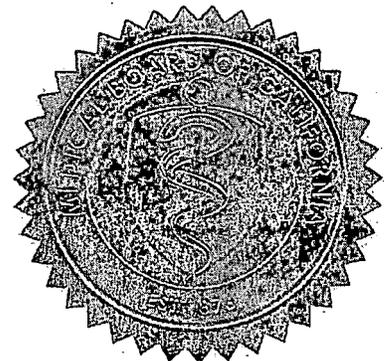
Respectfully submitted,

Reji T Varghese

REJI VARGHESE,
Executive Director of the
Medical Board of California

**SECTION 162 OF THE BUSINESS AND
PROFESSIONS CODE:**

The certificate of the officer in charge of the records of any board in the department that any person was or was not on a specified date, or during a specified period of time, licensed, certified or registered under the provisions of law administered by the Board, or that the license, certificate or registration of any person was revoked or under suspension, shall be admitted in any court as prima facie evidence of the facts therein recited.



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit B

Accusation No.800-2022-086412, Related Documents, and Declaration of Service

1 ROB BONTA
Attorney General of California
2 STEVE DIEHL
Supervising Deputy Attorney General
3 SARAH J. JACOBS
Deputy Attorney General
4 State Bar No. 255899
2550 Mariposa Mall, Room 5090
5 Fresno, CA 93721
Telephone: (559) 705-2320
6 Facsimile: (559) 445-5106
E-mail: Sarah.Jacobs@doj.ca.gov
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:	Case No. 800-2022-086412
13 VICTOR LYNN PERRY, M.D.	STATEMENT TO RESPONDENT
14 Physician's and Surgeon's Certificate No.	[Gov. Code §§ 11504, 11505(b)]
15 G86263	
16 Respondent.	

17
18
19 **TO RESPONDENT:**

20 Enclosed is a copy of the Accusation that has been filed with the Medical Board of
21 California of the Department of Consumer Affairs (Board), and which is hereby served on you.

22 Unless a written request for a hearing signed by you or on your behalf is delivered or
23 mailed to the Board, represented by Deputy Attorney General Sarah J. Jacobs, within fifteen (15)
24 days after a copy of the Accusation was personally served on you or mailed to you, you will be
25 deemed to have waived your right to a hearing in this matter and the Board may proceed upon the
26 Accusation without a hearing and may take action thereon as provided by law.

27 ///
28 ///

1 The request for hearing may be made by delivering or mailing one of the enclosed forms
2 entitled "Notice of Defense," or by delivering or mailing a Notice of Defense as provided in
3 section 11506 of the Government Code, to:

4 Sarah J. Jacobs
5 Deputy Attorney General
6 2550 Mariposa Mall, Room 5090
7 Fresno, CA 93721

8 You may, but need not, be represented by counsel at any or all stages of these proceedings.

9 The enclosed Notice of Defense, if signed and filed with the Board, shall be deemed a
10 specific denial of all parts of the Accusation, but you will not be permitted to raise any objection
11 to the form of the Accusation unless you file a further Notice of Defense as provided in section
12 11506 of the Government Code within fifteen (15) days after service of the Accusation on you.

13 If you file any Notice of Defense within the time permitted, a hearing will be held on the
14 charges made in the Accusation.

15 The hearing may be postponed for good cause. If you have good cause, you are obliged to
16 notify the Office of Administrative Hearings, 2349 Gateway Oak Drive, Suite 200, Sacramento,
17 CA 95833-4231, within ten (10) working days after you discover the good cause. Failure to
18 notify the Office of Administrative Hearings within ten (10) days will deprive you of a
19 postponement.

20 Copies of sections 11507.5, 11507.6, and 11507.7 of the Government Code are enclosed.

21 If you desire the names and addresses of witnesses or an opportunity to inspect and copy
22 the items mentioned in section 11507.6 of the Government Code in the possession, custody or
23 control of the Board you may send a Request for Discovery to the above designated Deputy
24 Attorney General.

25 **NOTICE REGARDING STIPULATED SETTLEMENTS**

26 It may be possible to avoid the time, expense and uncertainties involved in an
27 administrative hearing by disposing of this matter through a stipulated settlement. A stipulated
28 settlement is a binding written agreement between you and the government regarding the matters

1 charged and the discipline to be imposed. Such a stipulation would have to be approved by the
2 Medical Board of California but, once approved, it would be incorporated into a final order.

3 Any stipulation must be consistent with the Board's established disciplinary guidelines;
4 however, all matters in mitigation or aggravation will be considered. A copy of the Board's
5 Disciplinary Guidelines will be provided to you on your written request to the state agency
6 bringing this action.

7 If you are interested in pursuing this alternative to a formal administrative hearing, or if you
8 have any questions, you or your attorney should contact Deputy Attorney General Sarah J. Jacobs
9 at the earliest opportunity.

10

11 Dated: January 16, 2025

ROB BONTA
Attorney General of California
STEVE DIEHL
Supervising Deputy Attorney General

12

13

14



15

SARAH J. JACOBS
Deputy Attorney General
Attorneys for Complainant

16

17

18

FR2024305212
95608847.docx

19

20

21

22

23

24

25

26

27

28

1 ROB BONTA
Attorney General of California
2 STEVE DIEHL
Supervising Deputy Attorney General
3 SARAH J. JACOBS
Deputy Attorney General
4 State Bar No. 255899
2550 Mariposa Mall, Room 5090
5 Fresno, CA 93721
Telephone: (559) 705-2320
6 Facsimile: (559) 445-5106
E-mail: Sarah.Jacobs@doj.ca.gov
7 *Attorneys for Complainant*

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

In the Matter of the Accusation Against:

Case No. 800-2022-086412

**Victor Lynn Perry, M.D.
6177 N. Thesta St., Suite 103
Fresno, CA 93710**

ACCUSATION

**Physician's and Surgeon's Certificate
No. G 86263,**

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 October 12, 2001, the Medical Board issued Physician's and Surgeon's Certificate Number G 86263 to Victor Lynn Perry, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought herein and will expire on June 30, 2025, unless renewed.

///
///

1 JURISDICTION

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

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

6 The board shall have the responsibility for the following:

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

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

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

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

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

14 5. Section 2220 of the Code states, in pertinent part:

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

19 (a) Investigating complaints from the public, from other licensees, from health
20 care facilities, or from the board that a physician and surgeon may be guilty of
unprofessional conduct. The board shall investigate the circumstances underlying a
21 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
22 shall otherwise provide timely disposition of the reports received pursuant to Section
805 and Section 805.01. . . .

23 6. Section 2227 of the Code states:

24 (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
25 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
26 provisions of this chapter:

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

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

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

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

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

6 (b) Any matter heard pursuant to subdivision (a), except for warning letters,
7 medical review or advisory conferences, professional competency examinations,
8 continuing education activities, and cost reimbursement associated therewith that are
9 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.

7. Section 2228.1 of the Code states:

10 (a) On and after July 1, 2019, except as otherwise provided in subdivision (c),
11 the board and the Podiatric Medical Board of California shall require a licensee to
12 provide a separate disclosure that includes the licensee's probation status, the length
of the probation, the probation end date, all practice restrictions placed on the licensee
13 by the board, the board's telephone number, and an explanation of how the patient
can find further information on the licensee's probation on the licensee's profile page
14 on the board's online license information internet website, to a patient or the patient's
guardian or health care surrogate before the patient's first visit following the
probationary order while the licensee is on probation pursuant to a probationary order
15 made on and after July 1, 2019, in any of the following circumstances:

16 (1) A final adjudication by the board following an administrative hearing or
17 admitted findings or prima facie showing in a stipulated settlement establishing any
of the following:

18 (A) The commission of any act of sexual abuse, misconduct, or relations with a
patient or client as defined in Section 726 or 729.

19 (B) Drug or alcohol abuse directly resulting in harm to patients or the extent
20 that such use impairs the ability of the licensee to practice safely.

21 (C) Criminal conviction directly involving harm to patient health.

22 (D) Inappropriate prescribing resulting in harm to patients and a probationary
period of five years or more.

23 (2) An accusation or statement of issues alleged that the licensee committed any
24 of the acts described in subparagraphs (A) to (D), inclusive, of paragraph (1), and a
stipulated settlement based upon a nolo contendere or other similar compromise that
25 does not include any prima facie showing or admission of guilt or fact but does
include an express acknowledgment that the disclosure requirements of this section
26 would serve to protect the public interest.

27 (b) A licensee required to provide a disclosure pursuant to subdivision (a) shall
28 obtain from the patient, or the patient's guardian or health care surrogate, a separate,
signed copy of that disclosure.

1 (c) A licensee shall not be required to provide a disclosure pursuant to
subdivision (a) if any of the following applies:

2 (1) The patient is unconscious or otherwise unable to comprehend the
3 disclosure and sign the copy of the disclosure pursuant to subdivision (b) and a
4 guardian or health care surrogate is unavailable to comprehend the disclosure and
sign the copy.

5 (2) The visit occurs in an emergency room or an urgent care facility or the visit
is unscheduled, including consultations in inpatient facilities.

6 (3) The licensee who will be treating the patient during the visit is not known to
7 the patient until immediately prior to the start of the visit.

8 (4) The licensee does not have a direct treatment relationship with the patient.

9 (d) On and after July 1, 2019, the board shall provide the following
10 information, with respect to licensees on probation and licensees practicing under
probationary licenses, in plain view on the licensee's profile page on the board's
online license information internet website.

11 (1) For probation imposed pursuant to a stipulated settlement, the causes
12 alleged in the operative accusation along with a designation identifying those causes
by which the licensee has expressly admitted guilt and a statement that acceptance of
13 the settlement is not an admission of guilt.

14 (2) For probation imposed by an adjudicated decision of the board, the causes
for probation stated in the final probationary order.

15 (3) For a licensee granted a probationary license, the causes by which the
16 probationary license was imposed.

17 (4) The length of the probation and end date.

18 (5) All practice restrictions placed on the license by the board.

19 (e) Section 2314 shall not apply to this section.

20 **STATUTORY PROVISIONS**

21 8. Section 726 of the Code states:

22 (a) The commission of any act of sexual abuse, misconduct, or relations with a
23 patient, client, or customer constitutes unprofessional conduct and grounds for
disciplinary action for any person licensed under this or under any initiative act
24 referred to in this division.

25 (b) This section shall not apply to consensual sexual contact between a licensee
and his or her spouse or person in an equivalent domestic relationship when that
26 licensee provides medical treatment, to his or her spouse or person in an equivalent
domestic relationship.

27 9. Section 729 of the Code states:

28 (a) Any physician and surgeon, psychotherapist, alcohol and drug abuse

1 counselor or any person holding himself or herself out to be a physician and surgeon,
2 psychotherapist, or alcohol and drug abuse counselor, who engages in an act of sexual
3 intercourse, sodomy, oral copulation, or sexual contact with a patient or client, or
4 with a former patient or client when the relationship was terminated primarily for the
5 purpose of engaging in those acts, unless the physician and surgeon, psychotherapist,
6 or alcohol and drug abuse counselor has referred the patient or client to an
7 independent and objective physician and surgeon, psychotherapist, or alcohol and
8 drug abuse counselor recommended by a third-party physician and surgeon,
9 psychotherapist, or alcohol and drug abuse counselor for treatment, is guilty of sexual
10 exploitation by a physician and surgeon, psychotherapist, or alcohol and drug abuse
11 counselor.

12 (b) Sexual exploitation by a physician and surgeon, psychotherapist, or alcohol
13 and drug abuse counselor is a public offense:

14 (1) An act in violation of subdivision (a) shall be punishable by imprisonment
15 in a county jail for a period of not more than six months, or a fine not exceeding one
16 thousand dollars (\$1,000), or by both that imprisonment and fine.

17 (2) Multiple acts in violation of subdivision (a) with a single victim, when the
18 offender has no prior conviction for sexual exploitation, shall be punishable by
19 imprisonment in a county jail for a period of not more than six months, or a fine not
20 exceeding one thousand dollars (\$1,000), or by both that imprisonment and fine.

21 (3) An act or acts in violation of subdivision (a) with two or more victims shall
22 be punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the
23 Penal Code for a period of 16 months, two years, or three years, and a fine not
24 exceeding ten thousand dollars (\$10,000); or the act or acts shall be punishable by
25 imprisonment in a county jail for a period of not more than one year, or a fine not
26 exceeding one thousand dollars (\$1,000), or by both that imprisonment and fine.

27 (4) Two or more acts in violation of subdivision (a) with a single victim, when
28 the offender has at least one prior conviction for sexual exploitation, shall be
punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal
Code for a period of 16 months, two years, or three years, and a fine not exceeding
ten thousand dollars (\$10,000); or the act or acts shall be punishable by imprisonment
in a county jail for a period of not more than one year, or a fine not exceeding one
thousand dollars (\$1,000), or by both that imprisonment and fine.

(5) An act or acts in violation of subdivision (a) with two or more victims, and
the offender has at least one prior conviction for sexual exploitation, shall be
punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal
Code for a period of 16 months, two years, or three years, and a fine not exceeding
ten thousand dollars (\$10,000).

For purposes of subdivision (a), in no instance shall consent of the patient or
client be a defense. However, physicians and surgeons shall not be guilty of sexual
exploitation for touching any intimate part of a patient or client unless the touching is
outside the scope of medical examination and treatment, or the touching is done for
sexual gratification.

(c) For purposes of this section:

(1) "Psychotherapist" has the same meaning as defined in Section 728.

(2) "Alcohol and drug abuse counselor" means an individual who holds himself

1 or herself out to be an alcohol or drug abuse professional or paraprofessional.

2 (3) "Sexual contact" means sexual intercourse or the touching of an intimate
3 part of a patient for the purpose of sexual arousal, gratification, or abuse.

4 (4) "Intimate part" and "touching" have the same meanings as defined in
5 Section 243.4 of the Penal Code.

6 (d) In the investigation and prosecution of a violation of this section, no person
7 shall seek to obtain disclosure of any confidential files of other patients, clients, or
8 former patients or clients of the physician and surgeon, psychotherapist, or alcohol
9 and drug abuse counselor.

10 (e) This section does not apply to sexual contact between a physician and
11 surgeon and his or her spouse or person in an equivalent domestic relationship when
12 that physician and surgeon provides medical treatment, other than psychotherapeutic
13 treatment, to his or her spouse or person in an equivalent domestic relationship.

14 (f) If a physician and surgeon, psychotherapist, or alcohol and drug abuse
15 counselor in a professional partnership or similar group has sexual contact with a
16 patient in violation of this section, another physician and surgeon, psychotherapist, or
17 alcohol and drug abuse counselor in the partnership or group shall not be subject to
18 action under this section solely because of the occurrence of that sexual contact.

19 10. Section 2234 of the Code states:

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

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

25 (b) Gross negligence.

26 (c) Repeated negligent acts. To be repeated, there must be two or more
27 negligent acts or omissions. An initial negligent act or omission followed by a
28 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.

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

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

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

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

12 11. Section 2021 of the Code states:

13 (a) If the board publishes a directory pursuant to Section 112, it may require
14 persons licensed pursuant to this chapter [Chapter 5, the Medical Practice Act] to
15 furnish any information as it may deem necessary to enable it to compile the
16 directory.

17 (b) Each licensee shall report to the board each and every change of address,
18 including an email address, within 30 days after each change, giving both the old and
19 new address. If an address reported to the board at the time of application for
20 licensure or subsequently is a post office box, the applicant shall also provide the
21 board with a street address. If another address is the licensee's address of record, he
22 or she may request that the second address not be disclosed to the public.

23 (c) Each licensee shall report to the board each and every change of name
24 within 30 days after each change, giving both the old and new names.

25 (d) Each applicant and licensee shall have an electronic mail address and shall
26 report to the board that electronic mail address no later than July 1, 2022. The
27 electronic mail address shall be considered confidential and not subject to public
28 disclosure.

COST RECOVERY

12. 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.

///

///

///

1 FACTUAL ALLEGATIONS

2 13. On or about September 21, 2021, Patient A¹ had a follow-up office visit with
3 Respondent after he performed her neck surgery. Respondent examined her neck and asked if
4 anything else was bothering her. Patient A told Respondent about her sciatic nerve pain and
5 Respondent stated that he could check it. Respondent had Patient A perform some basic
6 movements (e.g., picking up and putting down legs, moving arms back and forth).

7 14. Respondent asked Patient A to lay down on the table and she complied. Respondent
8 pushed on the front groin area from side-to-side and in a small rubbing motion. Each time he
9 pressed he moved his hand in a small, half-circular motion. Respondent continued with the same
10 motion and moved down Patient A's groin, inside her thigh, and towards her pubic hair. Patient
11 A had her eyes closed. Respondent was asking questions and repeatedly saying, "It's okay.
12 You're okay. I'm just adjusting." Respondent's hand moved inside Patient A's underwear and
13 went on top of her vagina continuing with the same motion.

14 15. Patient A suffered from incontinence and was wearing a maxi pad in her underwear.
15 She felt the pad stick to Respondent's hand and could feel him struggling to remove it. Once he
16 removed the pad, he inserted his fingers into her vagina. He was not wearing gloves.

17 16. Patient A immediately opened her eyes and sat up, ending the examination.
18 Respondent asked Patient A if she was okay and she replied, "Maybe I should see a chiropractor
19 if I need adjusting." Patient A's pad was knocked out of place and hanging out of her underwear
20 to the side after the examination.

21 17. Patient A walked out of the examination room and Respondent followed her to the
22 front desk. Patient A told Respondent that her friend was waiting for her because she did not
23 want Respondent to know that she was alone. Respondent stood watching until Patient A said
24 that she wanted to schedule another appointment, then he walked away.

25 18. Patient A asked the receptionist for a pen and paper and then wrote, "Dr. Perry just
26 assaulted me," and then handed the note to the receptionist. The receptionist stated that she
27 would report it to the office manager, who was currently out of the office.

28 ¹ The patient's name is redacted to protect her privacy.

1 19. Respondent later called Patient A that same day apologizing for making her
2 uncomfortable and stated that he was just doing his job. Patient A replied, "you sexually
3 assaulted me," and Respondent did not argue or deny the allegation.

4 20. Patient A's maxi pad was tested for DNA (deoxyribonucleic), which was positive for
5 the male, Y chromosome; however, it was inconclusive as to Respondent for lack of an adequate
6 sample within the Y chromosome located on the maxi pad.

7 21. On July 6, 2023, Respondent updated his address of record to 6177 N. Thesta Ave.,
8 Suite 103, Fresno, CA 93710. On August 15, 2023, Board investigators received returned
9 certified and regular mail that requested medical records, which stated, "Return to Sender. No
10 mail receptable." On September 21, 2023, Respondent told Board investigators that the Thesta
11 address was the best place to send mail and that he was working on getting a mail receptacle. On
12 March 15, 2024, Fresno police officers discovered that Respondent's address of record on Thesta
13 was vacant. On May 2, 2024, Board investigators were informed by Fresno Police that
14 Respondent's address was 21030 Redwood Rd., Castro Valley, CA 94546. Board investigators
15 called the Redwood address medical office and staff informed investigators that Respondent no
16 longer worked there but they would try to get a forwarding address for investigators. On May 23,
17 2024, staff called to inform investigators that Respondent was staying in a hotel and could not
18 provide a forwarding address. On July 1, 2024, investigators sent an interview request letter via
19 certified and regular mail to Respondent's address of record on Thesta, which was returned
20 stating "Return to sender. Not deliverable as addressed. Unable to Forward." On August 29,
21 2024, Board investigators determined that Respondent's address of record with the Board on
22 Thesta was vacant. On September 6, 2024, at a hotel located on McKinley Ave. in Fresno, CA,
23 police served Respondent with a subpoena to appear for an interview. On September 26, 2024,
24 Respondent spoke to Board investigators, and he was unable to provide an address of record. On
25 October 2, 2024, Board investigators emailed Respondent requesting a new address of record. On
26 October 21, 2024, Board investigators sent a notice to appear for an interview to Respondent's
27 address of record on Thesta; it was returned on October 28, 2024, as "Return to Sender.
28 Attempted - Not Known. Unable to Forward." When Board investigators finalized and signed

1 their investigation report on November 13, 2024, Respondent had still not updated his address of
2 record.

3 22. On April 8, 2024, Fresno police officers obtained cell phone ping coordinates (the
4 latitude and longitude of Respondent's cell phone) and they responded to the location of 446
5 South 2nd St., Kerman, CA, with a search warrant and obtained Respondent's DNA. Officers
6 wrote in their report,

7 . . . based on Victor Lynn Perry's pattern of life between the years of 2021 to 2024, it
8 is this investigator's belief that Dr. Victor Lynn Perry was being elusive and
9 deceptive with the Fresno Police Department as well as the California Department of
Consumer Affairs / Medical Board.

10 **FIRST CAUSE FOR DISCIPLINE**

11 **(Sexual Exploitation of a Patient)**

12 23. Respondent Victor Lynn Perry, M.D. is subject to disciplinary action under section
13 729 of the Code, in that Respondent committed sexual contact with a patient. The circumstances
14 are set forth in paragraphs 13 through 22 above, which are incorporated here by reference.

15 **SECOND CAUSE FOR DISCIPLINE**

16 **(Sexual Misconduct with a Patient)**

17 24. Respondent Victor Lynn Perry, M.D. is subject to disciplinary action under section
18 726 of the Code, in that Respondent committed an act or acts of sexual misconduct with a patient.
19 The circumstances are set forth in paragraphs 13 through 22 above, which are incorporated here
20 by reference.

21 **THIRD CAUSE FOR DISCIPLINE**

22 **(Gross Negligence)**

23 25. Respondent Victor Lynn Perry, M.D. is subject to disciplinary action under section
24 2234, subdivision (b), of the Code, in that Respondent engaged in an act or acts exhibiting gross
25 negligence. The circumstances are set forth in paragraphs 13 through 22 above, which are
26 incorporated here by reference.

27 ///

28 ///

1 **FOURTH CAUSE FOR DISCIPLINE**

2 **(Failure to Update Address)**

3 26. Respondent Victor Lynn Perry, M.D. is subject to disciplinary action under section
4 2021 of the Code, in that he failed to report to the Board his change of address within 30 days
5 after each change. The circumstances are set forth in paragraphs 21 through 22 above, which are
6 incorporated here by reference.

7 **PRAYER**

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

- 10 1. Revoking or suspending Physician's and Surgeon's Certificate Number G 86263,
11 issued to Respondent Victor Lynn Perry, M.D.;
- 12 2. Revoking, suspending or denying approval of Respondent Victor Lynn Perry, M.D.'s
13 authority to supervise physician assistants and advanced practice nurses;
- 14 3. Ordering Respondent Victor Lynn Perry, M.D., to pay the Board the costs of the
15 investigation and enforcement of this case, and if placed on probation, the costs of probation
16 monitoring;
- 17 4. Ordering Respondent Victor Lynn Perry, M.D., if placed on probation, to provide
18 patient notification in accordance with Business and Professions Code section 2228.1; and
- 19 5. Taking such other and further action as deemed necessary and proper.

20
21 DATED: **FEB 03 2025**


22 REJI VARGHESE
23 Executive Director
24 Medical Board of California
25 Department of Consumer Affairs
26 State of California
27 Complainant

28
FR2024305212
95608113.docx

1 ROB BONTA
Attorney General of California
2 STEVE DIEHL
Supervising Deputy Attorney General
3 SARAH J. JACOBS
Deputy Attorney General
4 State Bar No. 255899
2550 Mariposa Mall, Room 5090
5 Fresno, CA 93721
Telephone: (559) 705-2320
6 Facsimile: (559) 445-5106
E-mail: Sarah.Jacobs@doj.ca.gov
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:
13 **VICTOR LYNN PERRY, M.D.**
14 **Physician's and Surgeon's Certificate No.**
15 **G86263**
16
17
18
19
20
21
22
23
24
25
26
27
28
Respondent.

Case No. 800-2022-086412
REQUEST FOR DISCOVERY

TO RESPONDENT:

Under section 11507.6 of the Government Code of the State of California, parties to an administrative hearing, including the Complainant, are entitled to certain information concerning the opposing party's case. A copy of the provisions of section 11507.6 of the Government Code concerning such rights is included among the papers served.

**PURSUANT TO SECTION 11507.6 OF THE GOVERNMENT CODE, YOU ARE
HEREBY REQUESTED TO:**

1. Provide the names and addresses of witnesses to the extent known to the Respondent, including, but not limited to, those intended to be called to testify at the hearing, and
2. Provide an opportunity for the Complainant to inspect and make a copy of any of the following in the possession or custody or under control of the Respondent:

1 a. A statement of a person, other than the Respondent, named in the
2 initial administrative pleading, or in any additional pleading, when it is claimed that
3 the act or omission of the Respondent as to this person is the basis for the
4 administrative proceeding;

5 b. A statement pertaining to the subject matter of the proceeding made
6 by any party to another party or persons;

7 c. Statements of witnesses then proposed to be called by the
8 Respondent and of other persons having personal knowledge of the acts, omissions or
9 events which are the basis for the proceeding, not included in (a) or (b) above;

10 d. All writings, including but not limited to reports of mental, physical
11 and blood examinations and things which the Respondent now proposes to offer in
12 evidence;

13 e. Any other writing or thing which is relevant and which would be
14 admissible in evidence, including but not limited to, any patient or hospital records
15 pertaining to the persons named in the pleading;

16 f. Investigative reports made by or on behalf of the Respondent
17 pertaining to the subject matter of the proceeding, to the extent that these reports (1)
18 contain the names and addresses of witnesses or of persons having personal
19 knowledge of the acts, omissions or events which are the basis for the proceeding, or
20 (2) reflect matters perceived by the investigator in the course of his or her
21 investigation, or (3) contain or include by attachment any statement or writing
22 described in (a) to (e), inclusive, or summary thereof.

23 IN ADDITION, if cost recovery is requested in the pleading prayer, provide all writings
24 which will support any objection which may be made by the Respondent, to Respondent's
25 payment of investigation and enforcement costs to the Board.

26 For the purpose of this Request for Discovery, "statements" include written statements by
27 the person, signed, or otherwise authenticated by him or her, stenographic, mechanical, electrical
28

1 or other recordings, or transcripts thereof, of oral statements by the person, and written reports or
2 summaries of these oral statements.

3 **YOU ARE HEREBY FURTHER NOTIFIED** that nothing in this Request for Discovery
4 should be deemed to authorize the inspection or copying of any writing or thing which is
5 privileged from disclosure by law or otherwise made confidential or protected as attorney's work
6 product.

7 Your response to this Request for Discovery should be directed to the undersigned attorney
8 for the Complainant at the address on the first page of this Request for Discovery within 30 days
9 after service of the Accusation.

10 Failure without substantial justification to comply with this Request for Discovery may
11 subject the Respondent to sanctions pursuant to sections 11507.7 and 11455.10 to 11455.30 of the
12 Government Code.

14 Dated: January 16, 2025

ROB BONTA
Attorney General of California
STEVE DIEHL
Supervising Deputy Attorney General



SARAH J. JACOBS
Deputy Attorney General
Attorneys for Complainant

21 FR2024305212
22 95608847.docx

23
24
25
26
27
28

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

In the Matter of the Accusation Against:

VICTOR LYNN PERRY, M.D.

Physician's and Surgeon's Certificate No.
G86263

Respondent.

Case No. 800-2022-086412

NOTICE OF DEFENSE

(Gov. Code §§ 11505 and 11506)

I hereby acknowledge receipt of a copy of the Accusation in the above-entitled proceeding, as well as the Statement to Respondent, Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery, and two copies of a Notice of Defense.

I further acknowledge that by filing this Notice of Defense, the Respondent is entitled to a hearing on the merits of the Accusation, and that under Government Code section 11506, the Respondent has a right to file a further Notice of Defense within the time specified in that section.

This Notice of Defense is filed on my own behalf as the Respondent or in my capacity as an authorized representative of an entity named as the Respondent in the Accusation.

Date:

Print Your Name:

Your Signature:

Respondent's Mailing Address:

Phone:

E-mail:

Check one box:

I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

Phone:

E-mail:

I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearings and a copy sent to the Deputy Attorney General who represents Complainant so that Respondent's counsel will be on record to receive legal notices, pleadings and other papers.

Check box if applicable:

- I wish to avoid a hearing if possible and be considered for a stipulated settlement or stipulated surrender of license.

The agency taking the action described in the Accusation may have formulated disciplinary guidelines. You may obtain a copy of the guidelines by requesting them in writing from the agency. A link to the agency's website can be found on-line at https://www.dca.ca.gov/about_us/entities.shtml at https://www.dca.ca.gov/about_us/entities.shtml.

FR2024305212
95608847.docx

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

In the Matter of the Accusation Against:

VICTOR LYNN PERRY, M.D.

Physician's and Surgeon's Certificate No.
G86263

Respondent.

Case No. 800-2022-086412

NOTICE OF DEFENSE

(Gov. Code §§ 11505 and 11506)

I hereby acknowledge receipt of a copy of the Accusation in the above-entitled proceeding, as well as the Statement to Respondent, Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery, and two copies of a Notice of Defense.

I further acknowledge that by filing this Notice of Defense, the Respondent is entitled to a hearing on the merits of the Accusation, and that under Government Code section 11506, the Respondent has a right to file a further Notice of Defense within the time specified in that section.

This Notice of Defense is filed on my own behalf as the Respondent or in my capacity as an authorized representative of an entity named as the Respondent in the Accusation.

Date:

Print Your Name:

Your Signature:

Respondent's Mailing Address:

Phone:

E-mail

Check one box:

I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

Phone:

E-mail:

I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearings and a copy sent to the Deputy Attorney General who represents Complainant so that Respondent's counsel will be on record to receive legal notices, pleadings and other papers.

Check box if applicable:

- I wish to avoid a hearing if possible and be considered for a stipulated settlement or stipulated surrender of license.

The agency taking the action described in the Accusation may have formulated disciplinary guidelines. You may obtain a copy of the guidelines by requesting them in writing from the agency. A link to the agency's website can be found on-line at https://www.dca.ca.gov/about_us/entities.shtml at https://www.dca.ca.gov/about_us/entities.shtml.

FR2024305212
95608847.docx

**COPY OF GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7
PROVIDED PURSUANT TO GOVERNMENT CODE SECTIONS 11504 AND 11505**

SECTION 11507.5: Exclusivity of discovery provisions

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

SECTION 11507.6: Request for discovery

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

SECTION 11507.7: Petition to compel discovery; Order; Sanctions

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of Section 915 of the Evidence Code and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

DECLARATION OF SERVICE BY CERTIFIED AND FIRST-CLASS MAIL

In the Matter of the Accusation Against:

Victor Lynn Perry, M.D.

Case No. 800-2022-086412

I, the undersigned, declare that I am over 18 years of age and not a party to the within cause; my business address is 2005 Evergreen St., Sacramento, California 95815. I served a true copy of the attached:

STATEMENT TO RESPONDENT; ACCUSATION; REQUEST FOR DISCOVERY; GOVERNMENT CODE SECTIONS 11507.5, 11507.6, and 11507.7; NOTICE OF DEFENSE FORM (2 COPIES).

by U.S. Certified mail on each of the following, by placing same in an envelope (or envelopes) addressed (respectively) as follows:

NAME AND ADDRESS

CERTIFIED MAIL TRACKING NO.

Victor Lynn Perry, M.D.
6177 N. Thesta St., Suite 103
Fresno, CA 93710

7020 2450 0000 6866 6031

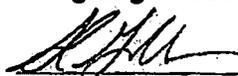
Sarah Jacobs
Deputy Attorney General
2550 Mariposa Mall, Room 5090
Fresno, CA 93721

FIRST-CLASS MAIL SERVICE

Each said envelope was then, on February 3, 2025, sealed and deposited in the United States mail at Sacramento, California, the county in which I am employed, either as certified mail or first-class U.S. mail with the postage thereon fully prepaid and return receipt requested for the certified mail.

Executed on February 3, 2025, at Sacramento, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



Samuel Guardado, Declarant

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit C

Notice of Defense, Notice of Hearing dated November 6, 2025, and Declaration of Service

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

In the Matter of the Accusation Against:

VICTOR LYNN PERRY, M.D.,

Respondent.

Case No. 800-2022-086412

NOTICE OF DEFENSE

(Gov. Code §§ 11505 and 11506)

I hereby acknowledge receipt of a copy of the Accusation in the above-entitled proceeding, as well as the Statement to Respondent, Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery, and two copies of a Notice of Defense.

I further acknowledge that by filing this Notice of Defense, the Respondent is entitled to a hearing on the merits of the Accusation, and that under Government Code section 11506, the Respondent has a right to file a further Notice of Defense within the time specified in that section.

This Notice of Defense is filed on my own behalf as the Respondent or in my capacity as an authorized representative of an entity named as the Respondent in the Accusation.

Date: *2-14-25*

Print Your Name: *Victor Lynn Perry, M.D.*

Your Signature: *M. D. Firestone, for Respondent, Victor Perry, MD*

Respondent's Mailing Address: *P.O. Box 8354 Fresno, CA 93747*

Phone: *415-420-6469*

E-mail: *victorlynnperry@gmail.com*

Check one box:

I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Marvin H. Firestone, M.D., JD

Counsel's Mailing Address

The Law Offices of Marvin Firestone, MD-JD & Associates

Phone:

1700 S El Camino Real Suite 408

E-mail:

650-212-4900

firestone@lawmcdjd.com

I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearings and a copy sent to the Deputy Attorney General who

represents Complainant so that Respondent's counsel will be on record to receive legal notices, pleadings and other papers.

Check box if applicable:

I wish to avoid a hearing if possible and be considered for a stipulated settlement or stipulated surrender of license.

The agency taking the action described in the Accusation may have formulated disciplinary guidelines. You may obtain a copy of the guidelines by requesting them in writing from the agency. A link to the agency's website can be found on-line at https://www.dca.ca.gov/about_us/e_titles.shtml.

SF2022604310
43588685.DOCX

1 ROB BONTA
Attorney General of California
2 STEVE DIEHL
Supervising Deputy Attorney General
3 SARAH J. JACOBS
Deputy Attorney General
4 State Bar No. 255899
2550 Mariposa Mall, Room 5090
5 Fresno, CA 93721
Telephone: (559) 705-2320
6 Facsimile: (559) 445-5106
E-mail: Sarah.Jacobs@doj.ca.gov
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

13 **VICTOR LYNN PERRY, M.D.**
14 **6177 N. Thesta St., Suite 103**
Fresno, CA 93710
15 **Physician's and Surgeon's Certificate**
No. G 86263,

16 Respondent.

Case No. 800-2022-086412

OAH No. 2025040324

**NOTICE OF HEARING; PREHEARING
AND MANDATORY SETTLEMENT
CONFERENCE**

[Gov. Code, § 11509]

Hearing: November 17-21, 2025
PHC and MSC: Friday, October 17, 2025
Place: **VIRTUAL HEARING**

19
20 YOU ARE HEREBY NOTIFIED that a virtual hearing in this matter will commence on
21 **Monday, November 17, 2025, at 9:00 a.m.** and will continue on a day-to-day basis, as
22 necessary through **Friday, November 21, 2025.**

23 YOU ARE FURTHER NOTIFIED that a Prehearing and Mandatory Settlement Conference
24 will be held on **Friday, October 17, 2025, at 9:00 a.m.**, before an Administrative Law Judge via
25 video/teleconference.

26 The hearing and Prehearing and Mandatory Settlement Conference will be conducted
27 before the Medical Board of California by an Administrative Law Judge of the Office of
28

1 Administrative Hearings, upon the charges made in Accusation No. 800-2022-086412 served
2 upon you.

3 **THE HEARING IN THIS MATTER IS SET FOR A TELEPHONIC OR VIDEO**
4 **HEARING BY ORDER OF THE OFFICE OF ADMINISTRATIVE HEARINGS.**
5 **SPECIFIC INSTRUCTIONS REGARDING THIS HEARING HAVE BEEN OR WILL BE**
6 **ISSUED PRIOR TO THE HEARING.**

7 Pursuant to Government Code section 11508, subdivision (c), any party requesting to
8 change the location of the hearing from virtual to in person, must file a motion directly with the
9 Office of Administrative Hearings, with a proof of service on the opposing party, within 10 days
10 of service of the Notice of Hearing.

11 You may be present at the hearing. You have the right to be represented by an attorney at
12 your own expense. You are not entitled to the appointment of an attorney to represent you at
13 public expense. You are entitled to represent yourself without legal counsel. You may present
14 any relevant evidence, and will be given full opportunity to cross-examine all witnesses testifying
15 against you. You are entitled to the issuance of subpoenas to compel the attendance of witnesses
16 and the production of books, documents, or other things by applying to the Office of
17 Administrative Hearings, 2349 Gateway Oak Drive, Suite 200, Sacramento, CA 95833-4231,
18 telephone: (916) 263-0550.

19 **COST RECOVERY:** The Board reserves the right to supplement its cost declaration.

20 **INTERPRETER:** Pursuant to section 11435.20 of the Government Code, the hearing shall
21 be conducted in the English language. If a party or a party's witness does not proficiently speak
22 or understand the English language and before commencement of the hearing requests language
23 assistance, an agency subject to the language assistance requirement in section 11435.15 of the
24 Government Code shall provide a certified interpreter or an interpreter approved by the
25 administrative law judge conducting the proceedings. The cost of providing the interpreter shall
26 be paid by the agency having jurisdiction over the matter if the administrative law judge or
27 hearing officer so directs, otherwise by the party for whom the interpreter is provided. If you or a
28

1 witness requires the assistance of an interpreter, ample advance notice of this fact should be given
2 to the Office of Administrative Hearings so that appropriate arrangements can be made.

3 CONTINUANCES: Under section 11524 of the Government Code, the agency may grant a
4 continuance, but when an administrative law judge of the Office of Administrative Hearings has
5 been assigned to the hearing, no continuance may be granted except by him or her or by the
6 presiding Administrative Law Judge for good cause. When seeking a continuance, a party shall
7 apply for the continuance within ten (10) working days following the time the party discovered or
8 reasonably should have discovered the event or occurrence which establishes good cause for the
9 continuance. A continuance may be granted for good cause after the ten (10) working days have
10 lapsed only if the party seeking the continuance is not responsible for and has made a good faith
11 effort to prevent the condition or event establishing the good cause.

12 Continuances are not favored. If you need a continuance, immediately write or call the
13 Office of Administrative Hearings: 2349 Gateway Oak Drive, Suite 200, Sacramento, CA 95833-
14 4231, telephone: (916) 263-0550.

15
16
17 Dated: November 6, 2025

Respectfully submitted,
ROB BONTA
Attorney General of California
STEVE DIEHL
Supervising Deputy Attorney General



SARAH J. JACOBS
Deputy Attorney General
Attorneys for Complainant

18
19
20
21
22
23
24
25 FR2024305212
95622160.docx

**DECLARATION OF SERVICE BY CERTIFIED MAIL, FIRST CLASS MAIL
& E-MAIL**

(Separate Mailings)

Case Name: **In the Matter of the Accusation Against: Victor Lynn Perry, M.D.**

No.: **2025040324**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. My electronic service address is Lisa.Gaad@doj.ca.gov. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On November 6, 2025, I served the attached **NOTICE OF HEARING** by transmitting a true copy via electronic mail. In addition, by placing a true copy thereof enclosed in a sealed envelope as certified mail with return receipt requested, and another true copy of the **NOTICE OF HEARING** was enclosed in a second sealed envelope as first-class mail in the internal mail collection system at the Office of the Attorney General at 2550 Mariposa Mall, Room 5090, Fresno, CA 93721-2271, addressed as follows:

Victor Lynn Perry, M.D.

P.O. Box 8354

Fresno, CA 93747

Respondent in Pro Se

Certified mail no.:

9414 7266 9904 2209 2924 89

E-mail addresses:

victorlynnperry@gmail.com

vicperrymd@yahoo.com

Victor Lynn Perry, M.D.

6177 N Thesta St., Ste. 103

Fresno, CA 93710-8600

Certified mail no.:

9414 7266 9904 2246 1704 12

Victor Lynn Perry, M.D.

7255 N. Cedar Ave., Ste. 102

Fresno, CA 93720

Certified mail no.:

9414 7266 9904 2246 1704 29

Victor Lynn Perry, M.D.

1830 E. Shepherd Ave., Apt. 139

Fresno, CA 93720

Certified mail no.:

9414 7266 9904 2246 1704 36

Victor Lynn Perry, M.D.

3309 Prospect St.

Houston, TX 77004

Certified mail no.:

9414 7266 9904 2209 2924 58

Reji Varghese, Executive Director

Medical Board of California

2005 Evergreen Street Ste. 1200

Sacramento, CA 95815

Courtesy copy

Office of Administrative Hearings

www.applications.dgs.ca.gov/OAH/

OAHSFTWeb/UPloads

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on November 6, 2025, at Fresno, California.

Lisa Gaad

Declarant for electronic filing & service

/s/ Lisa Gaad

Signature

Jamie Carlton

Declarant

/s/ Jamie Carlton

Signature

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit D

Administrative Law Judge Coren W. Wong Findings dated November 18, 2025.



OFFICE OF ADMINISTRATIVE HEARINGS
 STATE OF CALIFORNIA
 GENERAL JURISDICTION DIVISION

For more information visit
www.dgs.ca.gov/oah

FINDINGS AND DECLARATION OF DEFAULT; ORDER OF REMAND
 (Gov. Code § 11520)

Case Name In the Matter of the Accusation Against Victor Lynn Perry, M.D.		OAH Case Number 2025040324
Name of Agency Medical Board of California		Agency Case Number 800-2022-086412
Agency Attorney Sarah J. Jacobs	Respondent/Appellant/Petitioner Victor Lynn Perry, M.D.	Respondent/Appellant/Petitioner Attorney Self-Represented Party

FINDINGS

A Notice of Hearing dated April 16, 2025, and November 6, 2025 was served on Respondent/Appellant/Petitioner on April 18, 2025, and November 6, 2025

The Notice of Hearing was served on Respondent/Appellant/Petitioner by (method of service)

- Certified Mail Regular US Mail Other Former attorney of record

at (address of service)

- The address provided by Respondent/Appellant/Petitioner in the Notice of Defense
 The address maintained by the Agency as the Address of Record for Respondent/Appellant/Petitioner
 Other address provided by Respondent/Appellant/Petitioner

The Notice of Hearing provided notice that a hearing would take place on (date) November 17 - 21, 2025 at (time) 9:00 a.m.
 at (location):

SACRAMENTO
 2349 GATEWAY OAKS DR., SUITE 200
 SACRAMENTO, CA 95833
 Phone 916-263-0550

OAKLAND
 1515 CLAY STREET, SUITE 206
 OAKLAND, CA 94612
 Phone 510-622-2722

LOS ANGELES
 320 WEST FOURTH STREET, SUITE 630
 LOS ANGELES, CA 90013
 Phone 213-576-7200

SAN DIEGO
 EMERALD PLAZA
 402 WEST BROADWAY, SUITE 600
 SAN DIEGO, CA 92101
 Phone 619-525-4475

OTHER LOCATION: Via Zoom per the instructions emailed to the parties on September 30, 2025

The matter was called for hearing at the date, time and location set forth in the Notice of Hearing. Counsel for the Agency appeared for hearing. Service of the Notice of Hearing was proper.

There was no appearance by or on behalf of Respondent/Appellant/Petitioner. At (time) 9:35 a.m. a default was declared.

Agency counsel has moved for remand of the matter for Agency action under Government Code section 11520.

ORDER OF REMAND

Based upon Respondent/Appellant/Petitioner's failure to appear at the hearing, the Agency's motion is granted. This matter is remanded to the Agency under Government Code section 11520.

DATED: November 18, 2025	ADMINISTRATIVE LAW JUDGE (Print): Coren D. Wong	ADMINISTRATIVE LAW JUDGE (Signature):
-----------------------------	---	---

Coren D. Wong (Nov 18, 2025 10:59:56 PM)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit E

Declaration of Patient A

1 ROB BONTA
Attorney General of California
2 STEVE DIEHL
Supervising Deputy Attorney General
3 SARAH J. JACOBS
Deputy Attorney General
4 State Bar No. 255899
2550 Mariposa Mall, Room 5090
5 Fresno, CA 93721
Telephone: (559) 705-2320
6 Facsimile: (559) 445-5106
E-mail: Sarah.Jacobs@doj.ca.gov
7 *Attorneys for Complainant.*

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

12 In the Matter of the Accusation Against:

Case No. 800-2022-086412

OAH No. 2025040324

13 **VICTOR LYNN PERRY, M.D.**

**DECLARATION OF LORENA
GONZALES**

14
15 Respondent.

16
17 I, Lorena Gonzales declare:

18 1. I am Patient A in this case. I have personal knowledge of the facts stated herein and, if
19 called as a witness I could and would testify competently to those facts.

20 2. Dr. Victor Lynn Perry performed neck surgery on me on or about September 13, 2021.

21 3. On or about September 21, 2021, I had a follow-up appointment with Dr. Perry. We
22 were alone in an exam room with the door closed when Dr. Perry examined me and said my
23 incision was healing well and then he asked me if anything else was bothering me. I replied that I
24 have multiple sclerosis and sciatic nerve pain on my left side and Dr. Perry stated that he could
25 check it.

26 4. Dr. Perry had me perform some basic physical test such as moving my arms back and
27 forth and walking back and forth to the wall. I was supine on the exam table when Dr. Perry
28 pushed on my front groin area from side-to-side and in a small rubbing motion. Each time he

DECLARATION OF LORENA GONZALES (2025040324)

1 pressed he moved his hand in a small half-circular motion. Dr. Perry continued with the same
2 motion and moved down my groin, inside my thigh, and towards my pubic hair. Dr. Perry was
3 repeatedly saying, "It's okay. You're okay. I'm just adjusting." I stated, "Maybe I should see a
4 chiropractor if I need adjusting." Dr. Perry's hand moved inside my underwear and went on top
5 of my vagina continuing with the same motion.

6 5. I suffer from incontinence and was wearing a maxi pad in my underwear. I felt the pad
7 stick to Dr. Perry's hand and could hear him struggling to remove it. Once he removed the pad,
8 he inserted his fingers into my vagina. He was not wearing gloves.

9 6. I immediately sat up, ending the examination. Dr. Perry asked if I was okay, and I said
10 yes and grabbed my phone. My maxi pad was knocked out of place and hanging out of my
11 underwear to the side after the examination.

12 7. At the front desk of Dr. Perry's medical office, I asked the receptionist for a blank piece
13 of paper and pen and wrote, "Dr. Perry just totally violated me!!!" I handed it back to the
14 receptionist. She responded that she would contact the officer manager who was currently out of
15 the office.

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct and that this declaration was executed in Fresno CA
18 on Jan. 13, 2026

19
20 
21 LORENA GONZALES
22 Declarant

21 FR2024305212
22 956746.17.docx

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit F

Certified Police Reports



DIVISION OF INVESTIGATION
 Sacramento Field Office #1
 2535 Capitol Oaks Dr., Ste. 220
 Sacramento, CA 95833
 (916) 263-2585 Fax (916) 263-2591



Subject: Victor Perry, MD Record No.: 21051895 and 22007935
 Facility/Business: Fresno Police Department Phone No.: (559)621-7000
 Address: 2323 Mariposa Mall City/State: Fresno, CA Zip: 93721

CERTIFICATION OF RECORDS

To the best of my knowledge, the copied documents, records and other materials enclosed herewith were and are prepared and maintained in the ordinary course of business by authorized persons or personnel of this facility or business at or near the time of the acts, conditions or events described by such records. The enclosed records of this facility or business are a true copy of the records described in the attached request for documents or subpoena duces tecum (check all boxes that apply):

the complete records consisting of 3 pages;

the complete records for the period beginning _____ and ending _____ consisting of _____ pages;

external media provided: describe type (CD/DVD, flash drive, etc.): _____ and quantity: _____
 Describe contents (if pdf(s), then indicate page number above): _____

the records itemized above; however, this facility or business does not have the following that was requested:

CERTIFICATION OF NO RECORDS

A thorough search of our files carried out under my direction and control revealed that this facility or business does not have the records described in the attached request for documents or subpoena duces tecum.

DECLARATION OF CUSTODIAN OF RECORDS

I, the undersigned, am familiar with the mode of preparation of, and have the authority to certify, the facility or business records. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 12/5/2024 at Fresno, California
 (Date) (Location)

C. Aranas #830 (559) 621-6210
 Signature Telephone number

Detective Chris Aranas Chris.Aranas@fresno.gov
 Print Name/Title Email address

CASE NO. 8002022086412

Incident Narrative Supplement Report 22007935-2

Primary Officer: Aranas, Christopher (P830)

: Aranas, Christopher (P830)

: Aranas, Christopher (P830)

: Senethavysouk, Kanlaya (T441)

Assigned District: Sex Crimes Restriction Classification: Sensitive Case ORI: CA0100500

Approved: 11/08/2024 08:10

Approved: 11/08/2024 08:11

Approved: 11/08/2024 09:03

Narrative

FOLLOW UP TO FRESNO PD 220007935:

DETECTIVES WHO CAN TESTIFY:

Detective Christopher Aranas #830 (Author)

Detective Brad Schreiner #878

SOURCE:

On or about 2/16/2022, while assigned as a detective to the Fresno Police Department's Sexual Assault Unit, I was this case for follow up. I attempted to call the Confidential Victim*, hereinafter referred to as CV* but I was not successful from the phone number which was inputted into the primary report. In the beginning of March 2022, through some research I was able to locate a phone number and called CV*. I introduced myself to CV* and explained the reason for the contact. CV* said she did not want to move forward with an investigation, and that she possibly needed some time to think about it. I said okay and advised to get back with me.

INVESTIGATION:

During the third week in March of 2022, I drove over to CV*'s residence and physically introduced myself. I explained to CV* it was important to hear from her what happened in Dr. Perry's medical office. After talking for a few minutes, CV* decided to come down to police headquarters for a follow up interview.

On 3/18/2022, CV* arrived at the Family Justice Bureau for the interview. The following summary statement was obtained.

SUMMARY STATEMENT FROM CONFIDENTIAL VICTIM*:

(The following is a summary from CV*, for full details refer to the recorded interview uploaded to Axon.)

I thanked CV* for coming down to (the department) so she could tell her account with what happened between her and Dr. Victor Perry. It was also expressed that CV* has anxiety and it's been very difficult to deal with the issues at hand due to the sexual assault. CV* further stated she has not been sleeping well and at times has panic attacks all day long.

CV* said on February 9, 2022 she was taken to St. Agnes hospital because she was at her house and had a very bad panic attack. I asked what brought on the panic attack. CV* said she was reading about an incident on the app NextDoor (Nextdoor Holdings Inc is a company that operates a hyperlocal social networking service for neighborhoods). CV* had read about a woman who was being seen as a patient and her doctor (neurosurgeon) was more concerned about the female's vagina than about the actual ailment that was bothering the female. When asked, CV* said the female did not mention the doctor's name in the NextDoor post.

CV* St. Agnes Care Northwest had referred CV* to Dr. Victor Perry (neurosurgeon). CV* confirmed that medical apportionment with Dr. Perry was September 21, 2021. I asked CV* why was she referred to Dr. Perry. CV* said she has Scoliosis, arthritis, and bursitis as well as nerve pain in her right leg. CV* had a massage therapist tell her she located a lump in

Narrative

between CV*'s (right) inner thigh and outer thigh. The therapist said the lump was approximately the size of a marble. I asked when her massage appointment was. CV* was not sure but thought the appointment was a couple of months ago.

CV* said on the day of the appointment, she walked into Dr. Perry's office and did not see anyone around. Dr. Perry eventually walked out and greeted CV*. He walked CV* over to the exam room and told CV* to undress from the waist down. CV* said there was no nurse and/or chaperone. Dr. Perry asked CV* to face down on the exam table. CV* also believed the exam room door was left open.

CV* Dr. Perry inserted his hand into her vagina and moved his hand/fingers around the inside of CV*'s vagina. CV* told Dr. Perry, she did not believe it was right. Dr. Perry replied, "Honey, just don't worry, everything is okay." He further explained this is what I have to do in order to find the tumor. Additionally, Dr. Perry told CV* he has to palpate her form the inside out. Dr. Perry did inform CV* that he found the tumor. After the exam Dr. Perry escorted CV* out of the exam room and CV* left as quick as she could.

I asked CV* if DR. Perry wore gloves. CV* said, No. CV* did say he wore a mask, but she described him as a black male adult. I asked CV* if Dr. Perry told her he was going to be inserting his fingers into her your vagina prior to him doing so. CV* said she did not recall Dr. Perry saying that or anything similar. I attempted to show a picture of CV*-1 (from the FPD 21051895 case) to CV* to determine if they knew one another but CV* did not want to view any additional photographs. So, our interview concluded. However, towards the end of the interview it was obvious that CV* became annoyed with our questioning and lost her patience. Most likely due to her anxiety issue(s), and the trauma endured from Dr. Perry's horrific, unprofessional and out of scope medical exam.

End of interview.

SUSPECT IDENTIFICATION:

After the interview, Detective A. Flores #1783 walked into the conference room and read a Fresno PD admonition to CV*. CV* understood the admonition and signed dated the form. She was then shown six individual photographs. CV* looked through all six photographs and chose the number #2 photograph. She also signed and dated the photograph. Dr. Perry was placed in the number #3 photograph. Though, it should be noted CV* did state that Dr. Perry wore a mask covering the majority of this face during the exam.

End of ID.

INVESTIGATION CONTINUED/ADDITIONAL INFORMATION:

During the investigation detectives learned that CV*'s medical appointment was on the same day as the CV*-1's post OP appointment, Both appointments were at 7255 N. Cedar #102, Fresno, California 93720 in the city of Fresno (Fresno PD case 21051895).

CONCLUSIONS/DEDUCTIONS:

On 9/21/2021, CV* went to a medical appointment for unknown type lump on the right side of her body. The doctor who examined her was verbally identified as Dr. Victor Perry. During the examine CV* said Dr. Perry touched her inappropriately when he inserted his fingers into CV*'s vagina. The examined appeared to be out of the scope of the medical evaluation performed by Dr. Perry. This investigation is also related to Fresno PD case 21051895, where a second CV* also alleged Dr. Perry sexually assaulted her when he digitally penetrated her vagina with his fingers during a post OP exam. Additionally, CV* suffered irreversible damage to her mental wellbeing.

During both investigations Dr. Perry has been uncooperative and elusive to law enforcement and the California State Medical Board. This investigation will be forward to the Fresno County District Attorney's Office for review.

DISPOSITIONAL INFORMATION:

Follow up to original report.

Narrative

Photos of exam room uploaded to Axon.

Interview with CV* uploaded to Axon.

Admonition and six pack uploaded to Axon.

Related Fresno PD sexual assault case 21051895.



DIVISION OF INVESTIGATION
 Sacramento Field Office #1
 2535 Capitol Oaks Dr., Ste. 220
 Sacramento, CA 95833
 (916) 263-2585 Fax (916) 263-2591



Subject: Victor Perry, MD Record No.: 21051895 and 22007935
 Facility/Business: Fresno Police Department Phone No.: (559)621-7000
 Address: 2323 Mariposa Mall City/State: Fresno, CA Zip: 93721

CERTIFICATION OF RECORDS

To the best of my knowledge, the copied documents, records and other materials enclosed herewith were and are prepared and maintained in the ordinary course of business by authorized persons or personnel of this facility or business at or near the time of the acts, conditions or events described by such records. The enclosed records of this facility or business are a true copy of the records described in the attached request for documents or subpoena duces tecum (check all boxes that apply):

the complete records consisting of 30 pages;

the complete records for the period beginning _____ and ending _____ consisting of _____ pages;

external media provided: describe type (CD/DVD, flash drive, etc.): _____ and quantity: _____
 Describe contents (if pdf(s), then indicate page number above): _____

the records itemized above; however, this facility or business does not have the following that was requested:

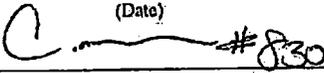
CERTIFICATION OF NO RECORDS

A thorough search of our files carried out under my direction and control revealed that this facility or business does not have the records described in the attached request for documents or subpoena duces tecum.

DECLARATION OF CUSTODIAN OF RECORDS

I, the undersigned, am familiar with the mode of preparation of, and have the authority to certify, the facility or business records. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 12/5/2024 at Fresno, California
 (Date) (Location)

 #830
 Signature Telephone number (559) 621-6210

Detective Chris Aranas
 Print Name/Title Email address Chris.Aranas@fresno.gov

CASE NO. 8002022086412

Incident 21051895

CFS ID: 21BH0659

Lead Detective: Aranas, Christopher (P830) Unit: Sex Crimes

Officers: Walls, Malcolm (P1736), Martinez, Jacob (T676), Jennings, Bradly (PT41), Aranas, Christopher (P830)

Assigned District: CE Patrol, Sex Crimes District, Beat, Zone: CE, 2D, 2257, NE, 4B, 1259

Case Status: Closed Internal Disposition: Closed (Requested Felony Warrant from DA) UCR Disposition: None

Arrestee: - Offense: GISAU SEXUAL ASSAULT, 289(A)(1)(A) SEX PENETRATION:FORCE/ETC - FELONY

Table of Contents

Document #	Document name	Page
1	Incident Report 21051895-1 (Report 1 of 7)	2 - 5
2	Incident Narrative Supplement Report 21051895-2 (Report 2 of 7)	6
3	Incident Narrative Supplement Report 21051895-3 (Report 3 of 7)	7
4	Incident Narrative Supplement Report 21051895-4 (Report 4 of 7)	8 - 14
5	Incident Narrative Supplement Report 21051895-5 (Report 5 of 7)	15
6	Incident Report 21051895-6 (Report 6 of 7)	16 - 20
7	Incident Report 21051895-7 (Report 7 of 7)	21 - 31
8	Incident 21051895 - Evidence List	32

Incident Report 21051895-1

Primary Officer: Walls, Malcolm (P1736)

: Desmond, Chris (S160)

: Soriano, Gayla (T523)

Assigned District: CE Patrol District, Beat, Zone: CE,2D,2257

Restriction Classification: Sensitive Case ORI: CA0100500

Approved: 09/26/2021 23:12

Approved: 09/28/2021 08:53

Overview

Incident Overview

Report Purpose: General Incident Incident From Date: 09/21/2021 Incident From Time: 13:09

Incident To Date: 09/21/2021 Incident To Time: 18:16 Does Date Indicate Report Date?: Yes

Cleared Exceptionally: Not Applicable Zip Code: 93703 ARRC Indicator: No Identity Theft Indicator: No

Modus Operandi

Places of Attack: Other Surrounding Areas: Other Suspect Actions: Other Victim Activities: Not At Home

Offenses

GISAU - SEXUAL ASSAULT Author: Walls, Malcolm

Code: GI Offense: GISAU - SEXUAL ASSAULT Severity: NOT_APPLICABLE Completion: Completed

Location: 2206 N Fresno St, Fresno, CA, 93703, USA

Additional Details

Offender is Suspected of Using?: No Was Criminal or Gang Activity Involved?: No Was Weapon/Force Involved?: No
Was Bias Motivation Involved?: No

Names

Restricted, Person

Involvement

Role: Involved Party Code: GI Offense: GISAU - SEXUAL ASSAULT

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] DOB: [REDACTED]

Description

Age: 53 Sex: Female Race: Hispanic/Latin/Mexican Ethnicity: Hispanic / Latino Eye Color: Brown
Hair Color: Black Hair Length: Short Facial Hair: Clean Shaven Build: Medium Complexion: Light/Fair
Resident Status: Unknown

Contact

[REDACTED]

Involved Party - Perry, Victor Author: Walls, Malcolm

Names (continued)

Involved Party - Perry, Victor Author: Walls, Malcolm

Involvement

Role: Involved Party Code: GI Offense: GISAU - SEXUAL ASSAULT

Identity

Type: Known Last Name: Perry First Name: Victor

Description

Sex: Male Occupation: Doctor

Contact

Address Type: Home Location: 7255 N Cedar Ave, Fresno, CA, 93720, USA

Phone Number Type: Home Phone Number: (559) 525-9088

Vehicles

None reported.

Property

None reported.

Narrative by Walls, Malcolm

First Submitted: 09/26/2021 05:12

Members Who Can Testify:

M. Walls, P1736

Source:

On 09/21/21 at approx. 2223 hours I was working uniformed patrol in the Central Policing district as detail 2D41 when I was dispatched to *address regarding a possible sexual assault.

Investigation:

I arrived at the location and contacted IP-Confidential inside of her residence. I asked IP-Confidential what was going on and she gave me the following statement regarding the incident.

STATEMENT OF IP-CONFIDENTIAL:

IP-Confidential told me that she recently had neck surgery and went into IP-Perry office for her check up. IP-Confidential explained that IP-Perry was doctor who performed her neck surgery and she had two previous contacts with him prior to her last visit. However, her last visit was the first time outside of her surgery that IP-Perry actually touched her. IP-Confidential informed me that she was alone in the room when Dr. Perry did his examination of her neck and asked her if anything else was bothering her. She told him about her sciatic nerve pain and he told her that he could check it. I asked IP-Confidential if her sciatic nerve was in her lower back and she told me no that it was in her butt.

IP-Confidential explained that Dr. Perry started the exam by having her do some basic physical test such as moving her arms back and forth and picking her legs up and putting them back down. Eventually he placed his right hand on her lower back and butt area and used his left hand to push the front of her groin area. IP-Confidential explained that Dr. Perry continued to pushed on her front groin area from side to side asking her questions. Eventually Dr. Perry left hand was inside of her underwear and went on top of her vagina. She started to ask her self if the exam was normal and if he intended to place his hand inside of her underwear. She tried to calm herself down as Dr. Perry continued to move his hand from side to side around her groin area. Shortly, after she felt Dr. Perry hand go inside her vagina. I asked IP-Confidential how many fingers did Dr. Perry place inside her vagina and how did she know it was his fingers. IP-Confidential told me that she knows because she is abstinent and she knows. IP-Confidential continued to tell me how Dr. Perry moved his hands from side to side on her vagina and continued to press along the inner part of her groin asking her if she felt pain in her sciatic nerve. After a few minutes Dr. Perry hand return to her vagina and she could feel him rubbing her. I asked IP-Confidential if Dr. Perry placed his hands inside of her and she shook her head yes. She explained that she knew what was going on wasn't right and that she should not be feeling the way she felt. The exam ended shortly after and she got dressed and walked to the front desk to schedule her next appointment.

IP-Confidential advised that she did not plan on returning to the location but Dr. Perry walked with her to the front counter and she was not sure exactly what to do. She grabbed a piece of paper and wrote a note to the receptionist Andrea that Dr. Perry violated her. After Dr. Perry walked away she told Andrea what happened. Andrea told her that she had to speak with her supervisor and will get back to her over the phone. IP-Confidential informed me that she left the location and received a phone call from Andrea around 1530 hours. Andrea advised that her that she reported the incident to her supervisor and encourage her to follow through with the process.

At approx. 1701 hours she received a phone call from Dr. Perry. Dr. Perry apologize for making her feel uncomfortable and stated that he was just doing his job. IP-Confidential informed me that she was shocked by Dr. Perry's responded and went to her primary care physician around 1730 hours to get sexual assault kit done. However, her primary care office informed her that they did not do sexual assault kits and recommended that she goes to the Emergency Room (ER) to get it done.

Narrative by Walls, Malcolm (continued)

First Submitted: 09/26/2021 05:12

IP-Confidential advised me that she did not want to go to the ER due to her concerns over Covid-19. IP-Confidential stated that she just decided to report the incident and wait at her residence until she was contacted by an Officer.

INVESTIGATION CONTINUED:

I was able to establish a timeline for the incident with IP-Confidential. She informed me that she called the doctor's office around 1309 hours advised that she was almost there. She was called to the back of the doctor's office around 1345 hours and left from the location shortly after 1430 hours. The incident took place while she was at the doctor's office from 1345 hours to 1430 hours. I contacted Sgt. Price as well as sexual assault unit Sgt. Viveros and informed them of the incident. I gathered all required forms and explained them to IP-Confidential. Due to the time of night and only having Dr. Perry's office information I was unable to contact him to get a statement regarding this incident.

Conclusions/Deductions:

On 09/21/21 IP-Confidential reported that she felt violated by IP-Perry during her medical exam.

Disposition:

- 1.) IP-Confidential was given a case number.
- 2.) IP-Confidential was given a sexual assault victims and Marsy form.
- 3.) IP-Confidential was given a sexual assault investigation letter.

Incident Narrative Supplement Report 21051895-2

Primary Officer: Martinez, Jacob (T676)

: Martinez, Jacob (T676)

: Viveros, John (S189)

: Garcia, Dalia (T391)

Assigned District: Sex Crimes Restriction Classification: Sensitive Case ORI: CA0100500

Approved: 09/27/2021 14:23

Approved: 09/29/2021 10:05

Approved: 09/29/2021 11:56

Narrative

MEMBERS WHO CAN TESTIFY:

J. Martinez T676

SOURCE:

On Monday, September 27th, 2021, while assigned to the Sexual Assault Unit for the Fresno Police Department, I was notified via phone call by Denise Wyatt Executive Director at the Family Healing Center (FHC) that a Sexual Assault Kit needed to be picked up from her location (7025 N. Chestnut Ave, Suite 102 Fresno, Ca 93720).

INVESTIGATION:

I responded to FHC and met with Heather McCoy Forensic Examiner RN, as she provided me with the following items:

Victim SAK-Kit

White bag with Victim Clothing

Manila Envelope with Victim C.D. containing photographs

White Duro bag labeled Victim Feminine Pad

Chain of custody was signed off. I transported the items to the Fresno Police Department Evidence Bureau and booked the Victim SAK-Kit, a White Bag labeled Victim Clothing, and a White Duro bag labeled Victim Feminine Pad into evidence.

I then responded to Fresno P.D. Headquarters, where I booked a Manila Envelope with a Victim C.D. containing photos into evidence.

CONCLUSIONS / DEDUCTIONS:

(See original report)

DISPOSITION:

1. I booked the above items into evidence at Fresno Police Department Evidence Bureau and into Headquarters Evidence Room.
2. I entered the SAK-V into S.A.F.E.-T.
3. SAK reports were submitted to Fresno Police Department Records.

Incident Narrative Supplement Report 21051895-3

Primary Officer: Jennings, Bradly (PT41)

: Jennings, Bradly (PT41)

: Viveros, John (S189)

: Moses, Linda (T398)

Assigned District: Sex Crimes Restriction Classification: Sensitive Case ORI: CA0100500

Approved: 02/15/2022 07:36

Approved: 02/15/2022 07:54

Approved: 02/15/2022 08:22

Narrative

SYNOPSIS REPORT:

Monday, February 14, 2022

FPD Property & Evidence Technician B. Jennings ID# PT41

SYNOPSIS:

On the above date, during the routine delivery of evidence to the California Department of Justice, Fresno Regional laboratory, Property Controller Nati Diaz, turned over to me the **Rapid Analysis DNA System (RADS)** produced in this case.

I transported the RADS to the FPD Evidence Warehouse, where I booked the kit as evidence under this case.

Incident Narrative Supplement Report 21051895-4

Primary Officer: Aranas, Christopher (P830)

: Aranas, Christopher (P830)

: Aranas, Christopher (P830)

: Senethavysouk, Kanlaya (T441)

Assigned District: Sex Crimes Restriction Classification: Sensitive Case ORI: CA0100500

Approved: 11/08/2024 08:15

Approved: 11/08/2024 13:53

Approved: 11/08/2024 14:04

Narrative

FOLLOW UP TO FRESNO PD 21051895:

DETECTIVES WHO CAN TESTIFY:

Detective Christopher Aranas #830 (Author)

Detective Brad Schreiner #878

SOURCE:

On 9/24/2021, while assigned as a detective in the Fresno Police Department's Sexual Assault Unit, I was advised by Sgt. Viveros of a victim who had been sexually assaulted by her doctor. Sgt. Viveros provided me the case and I reviewed the primary report documented by Fresno PD Officer M. Walls.

SUMMARY OF INVESTIGATION:

On September 21, 2021, Fresno Police Officer Malcolm Walls was dispatched to a confidential address in the city and county of Fresno regarding a sexual assault. Officer Walls contacted Confidential Victim*, hereinafter referred to as CV* and obtained the following statement.

CV* recently had back surgery and had a post-op appointment (on 9/21/2021) with her doctor who she verbally identified as Victor Perry MD, hereinafter referred to as Dr. Perry. The post-op appointment (and the location of occurrence) was at Doctor Perry's, medical office located at 7255 N. Cedar #102, Fresno, California 93720. CV* informed Officer Walls that Dr. Perry performed neck surgery on her, and she had two prior appointments/office visits with Dr. Perry prior to her surgery. During those prior two office appointments before her surgery, Dr. Perry did not touch any of CV*'s intimate body parts.

CV* told Officer Walls, earlier in the day during her post op exam, the only persons in the exam room at the time of the sexual assault was she and Dr. Perry. It should be noted, Dr. Perry did not have a chaperone present during CV*'s post op exam. Dr. Perry completed the post-op examination on CV*'s neck and then asked her if anything else was bothering her.

CV* told Dr. Perry she had sciatic nerve pain. Dr. Perry advised CV* he could examine her sciatic nerve. Officer Walls thought maybe CV*'s pain was in her lower back. So, he clarified with CV* and asked her where exactly on her body was the pain. CV* told Officer Walls the pain was in her butt, not her lower back. Dr. Perry began the (sciatic nerve pain exam) and asked CV* to perform some basic physical tests, such as moving her arms back and forth. As well as asking her to pick up her legs and put them back down, and to walk to the door and turn around. CV* walked back to the exam table and laid down. Dr. Perry then used his right hand and placed it on her lower back and butt area. He used his left hand and pushed on the front area of her groin.

CV* further explained as Dr. Perry continued to push on the front of CV*'s groin area he asked her some questions as he examined her lower body. CV* told Officer Walls that Dr. Perry had placed his left hand inside of her underwear and on top of her vagina. CV* said she did not ask why nor question Dr. Perry on the scope of his exam. But she was very frightened and lay frozen on the exam table.

Narrative

CV* tried to calm herself down as Dr. Perry continued to move his hand side to side around CV*'s vaginal area. Again Dr. Perry did not explain to CV* why he was doing that type of physical procedure(s) in and around her vaginal area. At one point during the exam, Dr. Perry pressed his hand along the inner part of CV*'s groin area and asked CV* if she felt any pain from her sciatic nerve.

A few minutes later Dr. Perry's hand was rubbing CV*'s vagina and at one point Dr. Perry inserted his fingers in and out of CV*'s vagina. When Dr. Perry appeared to be finished, CV* sat up and got dressed. She quickly walked out of the room and to the front desk and wrote on a blank piece of paper and handed it to the receptionist. The words on the paper were "**Dr. Perry just totally violated me!!!**" (The note was later collected and booked into evidence). The receptionist advised CV* that she would alert her office manager to the allegation, but the receptionist also advised CV* that the office manager was currently out of the office.

At approximately 17:01 hours, a few hours after CV*'s exam with Dr. Perry, he called CV* and apologized for making her feel uncomfortable during the exam, but said he was just doing his job. CV* became upset over Dr. Perry's comments and at 1730 hours she drove to her primary care physician's office and asked to have a sexual assault completed. The office personnel explained to CV* their office does not complete sexual assault exams; she would need to go to an emergency room at a hospital. CV* explained to Officer Walls she had concerns about going to a hospital during the COVID-19 period. Instead, CV* went back to her residence and called the police department.

End of synopsis.

INVESTIGATION CONTINUED:

On 09/24/21, approximately three days after sexual assault allegation, Detective Schreiner and I were notified of the incident. Therefore, I called CV*, introduced myself and requested she drive down to the Family Healing Center (FHC) to have a sexual assault exam completed.

I advised CV* we would meet her at the FHC. Detective Schreiner and I arrived at the Family Healing Center and contacted CV*, I explained the importance of having a sexual assault exam completed. After the exam was over Detective Schreiner and I attempted to interview CV* to clarify some of the information. But CV* said did not feel comfortable talking about the sexual assault just after the exam was completed. She requested some time and was advised to call us when she was ready to talk about the sexual assault.

INVESTIGATION CONTINUED/FOLLOW UP STATEMENT FROM CV*:

(The following is a summary from CV*, for full details refer to the recorded video interview uploaded to Axon.)

On 10/21/21, CV* came down to the police department and was interviewed by Detective Schreiner and I. CV*'s statement was consistent from when she was first interviewed by Officer Walls. However, CV* provided additional details as well as added some clarity regarding the sexual assault. CV* conveyed to Detective Schreiner and I that during the exam Dr. Perry did not wear gloves, and the exam room door was closed.

Additionally, during the exam when Dr. Perry was manipulating CV*'s legs as well as touching CV*'s groin area Dr. Perry continuously stated out loud "It's okay, it's okay, you fine, your fine", as he was initiating the adjustment(s). As Dr. Perry's hand got closer to CV*'s panty line, she became very nervous. At one point CV* asked Dr. Perry, since he was making an adjustment (on her body) that maybe she should see a chiropractor, so they could perform the adjustment. Dr. Perry told CV*, no that he would take care of her.

CV* told Detective Schreiner and I, she just laid there (on the exam table) and kept telling herself "This is your doctor, this is your doctor you have to trust your doctor, he is not going to do anything to you." As Dr. Perry continued to tell CV* "Everything is okay", his hand went under CV*'s shorts. Next thing CV* realized Dr. Perry was "Battling" her pad (CV* wore a pad due to an occasional incontinence issue) seconds later CV* felt Dr. Perry's hand pushed her pad out of the way, he then he slipped his hand under her underwear and ran his hand/fingers over her clitoris.

CV* reiterated that Dr. Perry continued to tell her "It's okay, you're okay", as he was touching her vagina. CV* said next thing she knew Dr. Perry had inserted his finger(s) into her vagina. I asked CV* which hand she believed Dr. Perry used to touch

Narrative

her vagina. CV* said it was Dr. Perry's left hand. When asked for clarification, CV* said Dr. Perry inserted his fingers in and out of her vagina at least four times. When asked, CV* said Dr. Perry did not explain during the exam why he rubbed and/or inserted his fingers into her vagina. After Dr. Perry inserted his fingers into CV*'s vagina, she got up from the exam table and got dressed. When CV* walked out of the exam room she walked directly to the receptionist and advised her she was sexually assaulted.

I asked CV* if she had her sciatic nerve problem examined in the past. CV* said a chiropractor had examined her sciatic nerve pain issue in the past. I asked if the chiropractor had used his hands or fingers on her body the same way Dr. Perry used his hand and fingers. CV* said, "No." I asked CV* if she asked Dr. Perry to examine her vagina or if Dr. Perry asked for consent to touch her vagina. CV* said no to both questions.

IDENTIFICATION OF SUSPECT:

Upon conclusion of the interview, Detective P. Nguyen stepped inside the room and verbally read off an admonishment to CV* that she was going to view some photographs. CV* understood the admonishment and signed the admonishment form. Detective Nguyen showed six photographs to CV*. She viewed all six photographs and picked the adult male in the number 3 sequence and identified the person in the number 3 sequence as Dr. Perry. The same person who sexually assaulted her during her post-op medical exam.

ADDITIONAL INFORMATION:

- On 12/07/2021, I called and left message/voicemail on phone number (559)525-9088 for Dr. Victor Perry to return my phone call.
- On 12/16/2021, I called and left message/voicemail on phone number (559)525-9088 for Dr. Victor Perry to return my phone call.
- On 1/13/2022, Dr. Victor Perry called me, and I identified myself and explained I would like to talk to him regarding a sexual assault allegations. Dr. Perry said he would like to talk about the investigation, but he needed to call his attorney, and he would get back to me.
- On 1/27/2022, I called Dr. Perry and left another message for him to return my phone call.
- On 2/17/2022, I called Agent Roxanne Caldera with the California State Medical Board and advised her of the sexual assault allegations against Dr. Victor Lynn Perry 6/17/1966.

INVESTIGATION CONTINUED SUMMARY OF FRESNO PD 22007935:

On 2/16/22, I was assigned a sexual assault case documented under Fresno PD case 22007935, the incident was regarding a Confidential Victim, hereinafter referred to as CV*-2 who was sexually assaulted by Victor Lynn Perry MD, also known as Dr. Perry. CV*-2 was at St. Agnes Hospital for panic attacks and anxiety due to the sexual assault. The emergency room nurse confirmed with CV*-2 that she had been sexually assaulted. CV*-2 told the nurse she was assaulted by a doctor. After which the nurse informed the Fresno Police Department.

On 2/09/22, Fresno PD Officer J. Reed responded to the emergency room (ER) at St. Agnes Hospital. Officer Reed spoke to the Reporting Party and CV*-2. CV*-2 reiterated to Officer Reed she was sexually assaulted by Dr. Perry. She further stated the incident happened approximately five months ago (possibly in the month of September of 2021) when she was referred to Dr. Perry (a neurosurgeon) by her primary doctor. CV*-2 said she informed Dr. Perry that a massage therapist had located a mass/tumor near her upper right groin area.

Dr. Perry asked CV*-2 to undress from the waist down and to lay down on the exam table face down. CV*-2 said there was no nurse or chaperone in the room at the time of the exam, but the exam room door was open. When asked, Dr. Perry did wear (exam) gloves. As CV*-2 laid face down Dr. Perry asked her to spread her legs wide open as wide as the exam table was wide. Dr. Perry began the exam by inserting his (what CV*-2 believed to Dr. Perry's) left hand into her vagina and rubbing his hand/fingers around the interior of CV*-2's vagina. While Dr. Perry's right hand was rubbing the exterior area of CV*-2's right hip. At that point CV*-2 asked Dr. Perry if this (procedure) was "Okay" the best way to locate the mass. Dr. Perry replied, "Yes, don't worry."

CV*-2 told Officer Reed she believed Dr. Perry was rubbing her vagina in a sexual way due to the way he ran his fingers over her vagina in a circular motion, which believed had nothing to do with locating the mass/tumor. After about a few minutes

Narrative

with Dr. Perry's hand/fingers inserted in CV*-2's vagina, Dr. Perry told CV*-2 he had located the mass, that was originally located by the massage therapist. Dr. Perry advised CV*-2 that the mass/tumor was the size of a marble. (It should note the mass/tumor was originally found by a massage therapist who did not need to penetrate CV*-2's vagina.)

I attempted to have CV*-2 identify Dr. Perry in a photograph, as well as have CV*-2 view a photograph of CV*-1 to determine if they know one another. But CV*-2 said she could not deal with any more questions that it was taking a toll on her mental health.

End of synopsis.

INVESTIGATION CONTINUED/CAL DOJ BFS REPORT:

(The following is a summary for exact and full details refer to BFS report uploaded to Axon.)

On or about July of 2022, I reviewed the California Department of Justice Bureau of Forensic Services report documented under case FR-21-004590-0001. The physical evidence examination report was completed by Senior Criminalist J. Upshaw. Criminalist Upshaw examined CV's external genitalia, vaginal and anal swabs and did not detect any male DNA.

INVESTIGATION CONTINUED/CAL DOJ BFS REPORT:

(The following is a summary for exact and full details refer to BFS report uploaded to Axon.)

On or about December of 2023, I reviewed the California Department of Justice Bureau of Forensic Services report documented under case FR-21-004590-0002. The physical evidence examination report was completed by Senior Criminalist J. Upshaw. Criminalist Upshaw examined the (CV*-1) feminine pad and swabbed the interior surface of the pad for possible deoxyribonucleic acid (DNA).

One of the swabs was extracted (from the pad) for DNA analysis. The swab was analyzed and determined to have Y-STR DNA present. Criminalist Upshaw requested a reference swab from any suspect(s).

INVESTIGATION CONTINUED:

It also should be noted that I have left several voice messages on Dr. Perry's voicemail and have only received one return phone call, in which Dr. Perry stated he would get a hold of his attorney and call me back for a date and time to answer questions, and that was on 01/13/2022.

Furthermore, Investigator K. Rodriguez with the California Department of Consumer Affairs / Medical Board Enforcement Division has also tried to contact Dr. Perry as well. However, he has yet to return her phone calls. The California Department of Consumer Affairs / Medical Board currently had an open investigation (**California Medical Board case 8002022086412**) on Dr. Perry, regarding this Fresno Police Department investigation.

INVESTIGATION CONTINUED:

On 3/15/24, I contacted the California Medical Board and spoke with Investigator K. Rodriguez who provided me with a (supposedly) updated address of Dr. Perry's medical office. I drove over to 6177 N. Thesta #103, in the city of Fresno to locate the medical office of Dr. Victor Lynn Perry. When I arrived at the Thesta address, I located suite #103 and found the office to be empty with no name/title on the office door, nor any title or name on the complex directory.

In the event Dr. Perry transferred back to his old office located at 7255 North Cedar #102, I drove to that medical building and checked suite #102, only to find it was closed but under a different doctor's name. I went next door to the open medical office and confirmed with the receptionist who stated Dr. Victor Perry was no longer working out of suite #102. The receptionist also mentioned it had been quite some time since Dr. Perry had worked in the neighboring office suite #102.

Additionally, during the month of March 2024, I had checked both last known addresses for Victor Lynn Perry. Both addresses were in the city of Fresno. I contacted the managers of both apartment complexes who each stated Victor Lynn Perry had been evicted from their respective apartments. Each manager stated Dr. Perry failed to pay rent for an extended

Narrative

period. Neither office manager had a forwarding address for Dr. Perry. Currently this investigator and Investigator Rodriguez with the California Department of Consumer Affairs / Medical Board are unable to locate Victor Lynn Perry, MD 6/17/66.

ADDITIONAL INFORMATION IN 2ND CASE FRESNO PD 22007935:

Towards the end of the interview with CV*-2 (in Fresno PD investigation 22007935) she told Detective Schreiner and I, she has anxiety and panic attacks, because of the sexual assault and did not want to go through with filing a criminal complaint against Dr. Perry. CV*-2 wanted to put it behind her and elevate the additional stress in her life. However, CV*-2's statement (as a second victim) corroborated Dr. Perry's heinous behavior and sexual misconduct with some of his patients. CV*-2's statement could later be used in the investigation by the prosecution. -*California Evidence Code 1108.*

INVESTIGATION CONTINUED:

As a result of the cell phone ping warrant authorized by The Honorable D. T. Tharpe, signed on 04/04/2024, I requested a DNA warrant to obtain two reference samples from Victor Lynn Perry for further DNA analysis. As it relates to the findings obtained from CV*'s sexual assault exam/kit, which was analyzed by the California Department of Justice Bureau of Forensics Services.

On 4/08/2024, The Honorable K. Nystrom-Geist signed a search warrant which authorized detectives to obtain Dr. Victor Lynn Perry's DNA, as a reference for criminalist's at the crime lab.

INVESTIGATION CONTINUED:

On 4/09/2024, through my city of Fresno, department email address, I had obtained cell phone ping coordinates from AT&T. The latitude and longitude (the whereabouts of Dr. Perry's cell phone) coordinates reflected an address in the city of Kerman, specifically at 446 South 2nd Street. Therefore, assisting detectives and I responded to that location. On our arrival to the residence, we set up a loose perimeter. Prior to setting up around the South 2nd residence, I briefed assisting detectives that Dr. Perry was last seen driving a white Dodge pick-up truck near his prior residence off Shephard Ave. A few minutes after our perimeter was set, Detective Kinney communicated through his law enforcement device he observed a white Dodge pick-up truck drive by his location towards the 446 South 2nd residence.

Therefore, I drove up to the residence and observed a white Dodge pick-up truck drive up the driveway and into the garage. I drove onto the driveway and activated my emergency lights and approached the driver's side door of the truck. A white female stepped out of the driver's seat who was later identified as Dawn Marie Avila 10/20/72. I identified myself to Avila and asked if Victor Perry was inside the truck. Avila said, "No." I asked if he was inside the residence. Avila said, "Yeah." I asked her to yell into the house and have Victor step out into the garage. Avila was very cooperative and did so. Within a few seconds a black male adult (who I recognized from his California DMV photo) walked into the garage. I also confirmed via asking the adult male his name. In which he stated "Victor Perry." I confirmed Dr. Victor Lynn Perry. Perry said, "Yeah." It should be noted upon my contact in the garage with Dr. Perry I smelled a strong odor of alcohol on his breath. I advised Dr. Perry I was a detective with the Fresno Police Department, and I had a search warrant to obtain his DNA.

The tailgate of the white Dodge pick-up truck was dropped down and Dr. Perry was told to have a seat. It should be noted Dr. Perry was informed the search warrant to obtain his DNA was a result to the ongoing sexual-assault investigation from a couple of years ago. It also should be noted no questions were asked relating directly to the sexual assault investigation. I asked Dr. Perry how long he had been staying at the South 2nd address. Perry replied, since about August of 2023. I asked if was working. Dr. Perry said he was working part time in Castro Valley in Dr. Doug Abeles office, off Redwood Road. I used two (department) buccal swabs and individually inserted one at a time into Dr. Perry's mouth and rubbed the swab against the inside cheek.

Prior to leaving I obtained Dr. Perry's current cell phone number (415)420-6469 and informed him, I would email him his notice of service search warrant paperwork as well as the signed search warrant, authorized by Judge K. Nystrom-Geist. Dr. Perry provided me his email address, vicperryd@yahoo.com. After my contact with Dr. Perry, I walked over and briefly spoke to Avila. I informed Avila the investigation is confidential, but I explained the reason why I arrived at her residence, in looking for Victor Lynn Perry to obtain his DNA. due to allegations of sexually assaulting two patients. I concluded my time with Avila and thanked her for her time as well as, apologized for disrupting her morning.

Narrative

I drove back to police headquarters and inputted the Dr. Perry's buccal swabs into evidence and secured them in the department's property/evidence refrigerator. I emailed B. Jennings and requested the buccal swab labeled 'for the district attorney's' (upon his schedule) be checked out and taken to the Bureau of Forensic Services crime lab for further analysis.

INVESTIGATION CONTINUED/CAL DOJ BFS REPORT:

(The following is a summary for exact and full details refer to BFS report uploaded to Axon.)

On or about August of 2024, I reviewed the California Department of Justice Bureau of Forensic Services report documented under case FR-21-004590-0001. The physical evidence examination report was completed by Senior Criminalist J. Upshaw. Criminalist Upshaw examined the buccal swab obtained from Victor Perry against the CV's swab from the feminine pad. Per Criminalist Upshaw, due to the limited genetic information present in the Y-STR DNA allele, no comparison could be made with Victor Perry's buccal swab.

CONCLUSIONS/DEDUCTIONS:

On 09/21/2021, CV had a schedule post OP medical appointment with Dr. Victor Perry. After the initial post OP exam was completed. Dr. Perry had asked CV if anything else was bothering her. CV told Dr. Perry her sciatic nerve pain had been troubling her. Dr. Perry said he could examine the issue. As Dr. Perry performed an examination on CV's nerve pain he slid his hand in between CV's shorts, and inserted his fingers into CV's vagina, digitally penetrating her. CV was horrified and froze on the exam table. The incident lasted a few minutes, after which CV walked out of the exam room and notified the receptionist that Dr. Perry had (just) sexually assaulted her.

CV left the office and told her partner who in turn advised CV to call the police. On 9/21/2021, Officer M. Walls responded to CV's residence and contacted CV. CV told Officer Walls, her primary care physician recommend CV have a sexual assault kit/examine completed. However, CV refused and did not have an exam completed until a couple of days later. On 09/25/2021 sexual assault detectives followed up with CV and obtained a recorded video interview, as well as attempted to obtain a statement from Dr. Perry, who refused to return phone calls with a date and time for an interview. During the investigation Dr. Perry was very uncooperative and elusive.

During the investigation CV's (incontinence) pad was sent over to the California Department of Justice Bureau of Forensic Services for DNA (deoxyribonucleic) testing. The criminalist at the crime lab requested a reference (DNA) swab for comparison. However, detectives were unable to locate Dr. Perry. Subsequently, Dr. Perry's cell phone was pinged through an authorized search warrant. Additionally, a second warrant was authorized/issued to obtain Dr. Perry's DNA. On 4/09/2024, Dr. Perry was located residing in the city of Kerman. Fresno Police Department Sexual Assault Detectives contacted Dr. Perry and served him with the DNA search warrant. During the search warrant service two swabs were collected. The swabs were sent to the California Department of Justice Crime Laboratory for analysis. The outcome of the swab testing was inconclusive.

Additionally, based on Victor Lynn Perry's pattern of life between the years of 2021 to 2024, it is this investigator's belief that Dr. Victor Lynn Perry was being elusive and deceptive with the Fresno Police Department as well as the California Department of Consumer Affairs / Medical Board.

Subsequently, based off statements from both CV's as it relates to the secondary incident documented under Fresno PD case 22007935. Dr. Victor Lynn Perry is in violation of sexual penetration upon two different patients. The investigation will be forward to the Fresno County District Attorney's Office for review.

DISPOSITIONAL INFORMATION:

- Follow up to original report.
- Refer to additional follow-ups.
- CV*'s note uploaded to Axon.
- Search warrants uploaded to Axon.

Narrative

Recorded interviews uploaded to Axon.

Admonition form and sic pack/photos uploaded to Axon.

Related Fresno PD sexual assault case 22007935.

Incident Narrative Supplement Report 21051895-5

Primary Officer: Jennings, Bradly (PT41)

: Jennings, Bradly (PT41)

: Viveros, John (S189)

: Dodd-Barrios, Collette (T674)

Assigned District: Sex Crimes Restriction Classification: Sensitive Case ORI: CA0100500

Approved: 02/28/2022 08:37

Approved: 02/28/2022 09:39

Approved: 02/28/2022 10:30

Narrative

On Thursday, February 24, 2022 I checked out and transported Victim clothing and Feminine Pad to DOJ Fresno for analysis. The items were release to Property Controller II, Martha Fierro.



Incident Report 21051895-6

Primary Officer: Aranas, Christopher (P830) Assisting Officer: Walls, Malcolm (P1736)
: Aranas, Christopher (P830)

: Smith, Dorothy (T95)

Assigned District: Sex Crimes District, Beat, Zone: CE,2D,2257 Restriction Classification: Sensitive Case ORI: CA0100500
Approved: 05/02/2024 16:12
Approved: 05/21/2024 07:03

Overview

Incident Overview

Report Purpose: General Incident Incident From Date: 09/21/2021 Incident From Time: 13:09
Incident To Date: 09/21/2021 Incident To Time: 18:16 Does Date Indicate Report Date?: Yes
Cleared Exceptionally: Not Applicable Zip Code: 93703 ARRC Indicator: No Identity Theft Indicator: No
Modus Operandi
Places of Attack: Other Surrounding Areas: Other Suspect Actions: Other Victim Activities: Not At Home

Offenses

GISAU - SEXUAL ASSAULT Author: Walls, Malcolm

Code: GI Offense: GISAU - SEXUAL ASSAULT Severity: NOT_APPLICABLE Completion: Completed
Location: 2206 N Fresno St, Fresno, CA, 93703, USA

Additional Details

Offender is Suspected of Using?: No Was Criminal or Gang Activity Involved?: No Was Weapon/Force Involved?: No
Was Bias Motivation Involved?: No

Names

Restricted, Person

Involvement

Role: Involved Party Code: GI Offense: GISAU - SEXUAL ASSAULT

Identity

Type: Known Last Name: [REDACTED] First Name: [REDACTED] DOB: [REDACTED]

Description

Age: 53 Sex: Female Race: Hispanic/Latin/Mexican Ethnicity: Hispanic / Latino Eye Color: Brown
Hair Color: Black Hair Length: Short Facial Hair: Clean Shaven Build: Medium Complexion: Light/Fair
Resident Status: Unknown

Contact

[REDACTED]

Involved Party - Perry, Victor Author: Walls, Malcolm

Names (continued)

Involved Party - Perry, Victor Author: Walls, Malcolm

Involvement

Role: Involved Party Code: GI Offense: GISAU - SEXUAL ASSAULT

Identity

Type: Known Last Name: Perry First Name: Victor

Description

Sex: Male Occupation: Doctor

Contact

Address Type: Home Location: 7255 N Cedar Ave, Fresno, CA, 93720, USA

Phone Number Type: Home Phone Number: (559) 525-9088

Vehicles

None reported.

Property

None reported.

Narrative by Aranas, Christopher

First Submitted: 05/02/2024 16:12

FOLLOW UP TO FRESNO PD 21051895:

DETECTIVES WHO CAN TESTIFY:

Detective Christopher Aranas #830 (Author)

Detective Adam Kinney #1838

Detective Ozzy Gomez #1869

SOURCE:

During the month of December 2023, I reviewed the California Department of Justice Bureau of Forensic Services report documented under DOJ case FR-21-004590-0002. The physical evidence examination report was completed by Senior Criminalist J. Upshaw. Criminalist Upshaw examined the feminine pad worn by CV-1*. Criminalist Upshaw swabbed the interior surface of the pad for possible deoxyribonucleic acid also known as D.N.A. One of the swabs was extracted (from the pad) was used for DNA analysis. The swab was analyzed and determined to have male DNA present. Criminalist Upshaw requested a reference swab from any suspect(s).

It also should be noted that I have left several voice messages on Dr. Perry's voicemail. I had only received one return phone call, in which Dr. Perry stated he would get hold of his attorney and call me back to schedule a date and time to answer questions. That (only return) phone call from Dr. Perry was 01/13/2022. Furthermore, Investigator K. Rodriguez with the California Department of Consumer Affairs / Medical Board Enforcement Division had also tried to contact Dr. Perry, but she was met with negative results as well.

INVESTIGATION:

Therefore, on 4/03/24, I initiated follow up and authored a search warrant, to ping Dr. Victor Lynn Perry's cellular device. In hopes of locating Dr. Perry. The warrant was signed on 4/04/2024, by The Honorable D.T. Tharpe Superior Court of California, Fresno County. The number used to ping Dr. Perry's cell phone was (919)448-4490. I anticipated we would locate Dr. Perry, and so a secondary warrant was needed to obtain Dr. Victor Lynn Perry's DNA.

On 4/08/24, I authored a second search warrant, which was signed by The Honorable K. Nystrom-Geist Superior Court of California, Fresno County. The warrant was to lawfully obtain Victor Lynn Perry's DNA via two buccal swabs.

INVESTIGATION CONTINUED:

AT&T had activated Perry's cell phone pings on 4/05/24. The cell phone pings were consistently pinging in a small-town west of Fresno, within Fresno County. The town was identified as the City of Kerman. Therefore, on 4/09/24, myself and assisting sexual assault detectives (from the Fresno Police Department) along with Special Agents from the Mobile Wireless Investigations (MWI) unit within the United States Secret Service deployed to the city of Kerman. After several minutes the MWI unit pinpointed a ping from Perry's cell phone at 446 South 2nd Street, Kerman California.

Myself and assisting detectives had set up around the 446 South 2nd residence. Detective Kinney was parked to the north of the residence when he spotted a white Dodge pick up driving southbound on South 2nd. The truck had matched the description I had provided earlier to assisting detectives. Detective Kinney provided updates via our cell phones and advised the white truck had pulled into the driveway of the target location. I drove up and onto the driveway and activated my police emergency lights as the truck pulled into the garage. A white female with blonde hair exited the driver's side,

Narrative by Aranas, Christopher (continued) First Submitted: 05/02/2024 16:12

I introduced myself to the female who was later identified as Dawn Avila. I asked Avila if Victor Perry was inside the residence. Avila said, "Yes." I asked Avila to ask Victor to come out into the garage. Avila was very cooperative and opened the door to the residence from the garage and asked Victor to step outside (into the garage).

A couple of seconds later a black male stepped into the garage. I immediately recognized the male as Victor Lynn Perry (from his California Department of Motor Vehicle photograph, CDL D4602377.) I asked the male if he was Victor Lynn Perry, in which he said "Yeah", and nodded his head up and down. I identified and introduced myself to Dr. Perry and quickly patted him down and then asked him to have a seat on the pickup truck's tailgate. As I spoke to Perry, I could smell a strong odor of alcohol emitting from Perry's breath, I recalled I looked at my watch and it was approximately 0840 hours in the morning. I further explained to Perry I had a search warrant which was signed by a judge to obtain his DNA. I walked back to my car and retrieved two buccal swabs as well as a pair of latex gloves. I swabbed the inside of Perry's cheeks with the swabs.

I confirmed with Perry his phone number, (415) 420-6469 and explained to him he had not returned my phone calls, nor has he returned the phone calls from the investigator at California Medical Board. Perry said he travels out of town on Mondays and Fridays to see patients. I asked where is his medical office located. Perry said he works out of Dr. Doug Abeles' office in Castro Valley off Redwood Road. I advised Perry it would probably be a good idea to call the medical board and speak to the investigator.

I advised Perry, I was locked out of work email via my cell phone and unable to show him the search warrant. I told Perry would send him a copy of the search warrant and notice of service paperwork. I then asked Perry for his email.

• vicperrynd@yahoo.com

I thanked Perry for his time and cooperation. After which I walked over to Dawn Avila and thanked her as well.

INVESTIGATION CONTINUED:

Upon my return to police headquarters, I sent Perry an email with the search warrants, property receipt and notice of service paperwork. I also printed out a copy of the sent email and attached to Axon.

Additionally, I booked Perry's buccal swabs into evidence. One swab was labeled for the District Attorney's Office and the second swab was labeled for the Defense. I secured the swabs in the evidence refrigerator. I returned to my office and sent an email to Property / Evidence Technician (P/E Tech) Brad Jennings and requested Suspect Perry's buccal swab (for the DA's Office) be taken to the Cal DOJ crime laboratory for further analysis.

The following morning, on 4/10/24, I received an email from P/E Tech Jennings the buccal swab had been delivered to the crime laboratory.

CONCLUSIONS/DEDUCTIONS:

On 4/09/24, myself and assisting Fresno Police Department Sexual Assault detectives located Dr. Victor Lynn Perry at his residence in Kerman, California. Contact was made with Perry in the garage where I identified him via his California Department of Motor Vehicle photograph, as well as Perry verbally identifying himself as Dr. Victor Perry. After Dr. Perry was explained the reason for the contact- search warrant. He was detained and two buccal swabs were obtained from Perry's mouth/cheeks. Upon completion of the search warrant service, he was released. When I returned to police headquarters Perry's reference swabs were booked as evidence and secured in the department's evidence refrigerator. An email was also sent to Perry which contained the search warrants, property receipt and notice of service. A second

Narrative by Aranas, Christopher (continued) First Submitted: 05/02/2024 16:12

email was sent to P/E Tech Jennings, to have a buccal swab checked out of the department's property/evidence unit and delivered to the crime lab.

DISPO INFO:

Follow up to original report.

Dr. Perry's notice of search warrant service paperwork and warrants sent via email.

Buccal swabs booked into evidence frig at HQ.

Request for buccal swab delivered to DOJ crime lab completed.

Both search warrants and sent email were up loaded to Axon.

Incident Report 21051895-7

Primary Officer: Aranas, Christopher (P830) Assisting Officer: Walls, Malcolm (P1736)

: Aranas, Christopher (P830)

Approved: 11/08/2024 14:07

: Senethavysouk, Kanlaya (T441)

Approved: 11/08/2024 14:10

Assigned District: Sex Crimes District, Beat, Zone: NE,4B,1259 Restriction Classification: Sensitive Case

ORI: CA0100500

Overview

Incident Overview

Report Purpose: General Incident Incident From Date: 09/21/2021 Incident From Time: 13:09

Incident To Date: 09/21/2021 Incident To Time: 18:16 Does Date Indicate Report Date?: Yes

Cleared Exceptionally: Not Applicable Zip Code: 93703 ARRC Indicator: No Identity Theft Indicator: No

Modus Operandi

Places of Attack: Other Surrounding Areas: Other Suspect Actions: Other Victim Activities: Not At Home

Offenses

289(A)(1)(A) - SEX PENETRATION:FORCE/ETC - FEL Author: Aranas, Christopher

Code: PC Offense: 289(A)(1)(A) - SEX PENETRATION:FORCE/ETC - FEL NIBRS UCR Code: Sexual Assault With An Object

Severity: FELONY Completion: Completed Location: 7255 N Cedar Ave, Fresno, CA, 93720, USA

Location Note: 7255 N. Cedar Ave #102, Fresno Ca 93720 (Dr. Perry medical office Pan Pacific Neurosurgeon)

Location Category: Doctor's Office

Additional Details

Offender is Suspected of Using?: Yes Was Criminal or Gang Activity Involved?: No Was Weapon/Force Involved?: No

Was Bias Motivation Involved?: No Offender Suspected of Using: A - Alcohol

Names

Restricted, Person

Involvement

Role: Involved Party

Identity 

Type: Known Last Name: [REDACTED] First Name: [REDACTED] DOB: [REDACTED]

Description

Age: 53 Sex: Female Race: Hispanic/Latin/Mexican Ethnicity: Hispanic / Latino Eye Color: Brown

Hair Color: Black Hair Length: Short Facial Hair: Clean Shaven Build: Medium Complexion: Light/Fair

Resident Status: Unknown

Names (continued)

Contact
[REDACTED]

Relationships
[REDACTED]

Involved Party - Perry, Victor Author: Walls, Malcolm

Involvement
Role: Involved Party

Identity
Type: Known Last Name: Perry First Name: Victor

Description
Sex: Male Occupation: Doctor

Contact
Address Type: Home Location: 7255 N Cedar Ave, Fresno, CA, 93720, USA
Phone Number Type: Home Phone Number: (559) 525-9088

Relationships
Name: Perry, Victor Lynn Is: Patient

PERRY, VICTOR LYNN Author: Aranas, Christopher

Identity
Type: Known Last Name: PERRY First Name: VICTOR Middle Name: LYNN DOB: 06/17/1966

Identifying Documents
ID Type: Driver's License Issuing State: California ID Number: D4602377
Class: CLASS C OR VALID DRIVING PERMIT

Description
Age: 55 Sex: Male Race: Black Ethnicity: Not Hispanic / Latino Height: 6'1" Weight: 190 Eye Color: Brown
Hair Color: Black

Contact
Address Type: Home Location: 1830 E SHEPHERD AVE #134+, FRESNO CA 93720-5618 Location Note: APT #139
Phone Number Type: Home

Suspect - Perry, Victor Lynn Author: Aranas, Christopher

Involvement
Role: Suspect Code: PC Offense: 289(A)(1)(A) - SEX PENETRATION:FORCE/ETC - FEL

Identity

Names (continued)

Type: Known Last Name: Perry First Name: Victor Middle Name: Lynn DOB: 06/17/1966
Alias: Dr. Perry

Identifying Documents

ID Type: Driver's License Issuing State: California ID Number: D4602377

Description

Age: 55 Sex: Male Race: Black Height: 6'1" Weight: 195 Eye Color: Brown Hair Color: Black
Hair Length: Short Hair Style: Military Facial Hair: Unshaven Hair Type: Unknown Build: Medium
Complexion: Dark Resident Status: Resident Employer: Self Occupation: Doctor
General Description / Clothing
N/A

Contact

Address Type: Home Location Note: Unknown address, Doctor is transient
Phone Number Type: Home Phone Number: (415) 429-0646

Relationships

Name: Perry, Victor Is: Health Professional
Name: [REDACTED] Is: Patient

Suspect Status

Suspect Status: At Large

Vehicles

None reported.

Property

None reported.

Narrative by Aranas, Christopher

First Submitted: 11/08/2024 08:52

FOLLOW UP TO FRESNO PD 21051895:

DETECTIVES WHO CAN TESTIFY:

Detective Christopher Aranas #830 (Author)

Detective Brad Schreiner #878

SOURCE:

On 9/24/2021, while assigned as a detective in the Fresno Police Department's Sexual Assault Unit, I was advised by Sergeant Viveros of a victim who had been sexually assaulted by her doctor. Sgt. Viveros provided me the case and I reviewed the primary report documented by Fresno PD Officer M. Walls.

SUMMARY OF INVESTIGATION:

On September 21, 2021, Fresno Police Officer Malcolm Walls was dispatched to a confidential address in the city and county of Fresno regarding a sexual assault. Officer Walls contacted Confidential Victim*, hereinafter referred to as CV* and obtained the following statement.

CV* recently had back surgery and had a post-op appointment (on 9/21/2021) with her doctor who she verbally identified as Victor Perry MD, hereinafter referred to as Dr. Perry. The post-op appointment (and the location of occurrence) was at Doctor Perry's, medical office located at 7255 N. Cedar #102, Fresno, California 93720. CV* informed Officer Walls that Dr. Perry performed neck surgery on her, and she had two prior appointments/office visits with Dr. Perry prior to her surgery. During those prior two office appointments before her surgery, Dr. Perry did not touch any of CV*'s intimate body parts.

CV* told Officer Walls, earlier in the day during her post op exam, the only persons in the exam room at the time of the sexual assault was she and Dr. Perry. It should be noted, Dr. Perry did not have a chaperone present during CV*'s post op exam. Dr. Perry completed the post-op examination on CV*'s neck and then asked her if anything else was bothering her.

CV* told Dr. Perry she had sciatic nerve pain. Dr. Perry advised CV* he could examine her sciatic nerve. Officer Walls thought maybe CV*'s pain was in her lower back. So, he clarified with CV* and asked her where exactly on her body was the pain. CV* told Officer Walls the pain was in her butt, not her lower back. Dr. Perry began the (sciatic nerve pain exam) and asked CV* to perform some basic physical tests, such as moving her arms back and forth. As well as asking her to pick up her legs and put them back down, and to walk to the door and turn around. CV* walked back to the exam table and laid down. Dr. Perry then used his right hand and placed it on her lower back and butt area. He used his left hand and pushed on the front area of her groin.

CV* further explained as Dr. Perry continued to push on the front of CV*'s groin area he asked her some questions as he examined her lower body. CV* told Officer Walls that Dr. Perry had placed his left hand inside of her underwear and on top of her vagina. CV* said she did not ask why nor question Dr. Perry on the scope of his exam. But she was very frightened and lay frozen on the exam table.

CV* tried to calm herself down as Dr. Perry continued to move his hand side to side around CV*'s vaginal area. Again Dr. Perry did not explain to CV* why he was doing that type of physical procedure(s) in and around her vaginal area. At one point during the exam, Dr. Perry pressed his hand along the inner part of CV*'s groin area and asked CV* if she felt any pain from her sciatic nerve.

A few minutes later Dr. Perry's hand was rubbing CV*'s vagina and at one point Dr. Perry inserted his fingers in and out of CV*'s vagina. When Dr. Perry appeared to be finished, CV* sat up and got dressed. She quickly walked out of the room and to the front desk and wrote on a blank piece of paper and handed it to the receptionist. The words on the paper were "Dr. Perry just totally violated me!!!" (The note was later collected and booked into evidence). The receptionist advised CV* that she would alert her office manager to the allegation, but the receptionist also advised CV* that the office manager was currently out of the office.

At approximately 17:01 hours, a few hours after CV*'s exam with Dr. Perry, he called CV* and apologized for making her feel uncomfortable during the exam, but said he was just doing his job. CV* became upset over Dr Perry's comments and at 1730 hours she drove to her primary care physician's office and asked to have a sexual assault completed. The office personnel explained to CV* their office does not complete sexual assault exams; she would need to go to an emergency room at a hospital. CV* explained to Officer Walls she had concerns about going to a hospital during the COVID-19 period. Instead, CV* went back to her residence and called the police department.

End of synopsis.

INVESTIGATION CONTINUED:

On 09/24/21, approximately three days after sexual assault allegation, Detective Schreiner and I were notified of the incident. Therefore, I called CV*, introduced myself and requested she drive down to the Family Healing Center (FHC) to have a sexual assault exam completed.

I advised CV* we would meet her at the FHC. Detective Schreiner and I arrived at the Family Healing Center and contacted CV*, I explained the importance of having a sexual assault exam completed. After the exam was over Detective Schreiner and I attempted to interview CV* to clarify some of the information. But CV* said did not feel comfortable talking about the sexual assault just after the exam was completed. She requested some time and was advised to call us when she was ready to talk about the sexual assault.

INVESTIGATION CONTINUED/FOLLOW UP STATEMENT FROM CV*:

(The following is a summary from CV*, for full details refer to the recorded video interview uploaded to Axon.)

On 10/21/21, CV* came down to the police department and was interviewed by Detective Schreiner and I. CV*'s statement was consistent from when she was first interviewed by Officer Walls. However, CV* provided additional details as well as added some clarity regarding the sexual assault. CV* conveyed to Detective Schreiner and I that during the exam Dr. Perry did not wear gloves, and the exam room door was closed.

Additionally, during the exam when Dr. Perry was manipulating CV*'s legs as well as touching CV*'s groin area Dr. Perry continuously stated out loud "It's okay, it's okay, you fine, your fine", as he was initiating the adjustment(s). As Dr. Perry's hand got closer to CV*'s panty line, she became very nervous. At one point CV* asked Dr. Perry, since he was making an adjustment (on her body) that maybe she should see a chiropractor, so they could perform the adjustment. Dr. Perry told CV*, no that he would take care of her.

CV* told Detective Schreiner and I, she just laid there (on the exam table) and kept telling herself "This is your doctor, this is your doctor you have to trust your doctor, he is not going to do anything to you." As Dr. Perry continued to tell CV* "Everything is okay", his hand went under CV*'s shorts. Next thing CV* realized Dr. Perry was "Battling" her pad (CV* wore a pad due to an occasional incontinence issue) seconds later CV* felt Dr. Perry's hand pushed her pad out of the way, he then he slipped his hand under her underwear and ran his hand/fingers over her clitoris.

CV* reiterated that Dr. Perry continued to tell her "It's okay, you're okay", as he was touching her vagina. CV* said next thing she knew Dr. Perry had inserted his finger(s) into her vagina. I asked CV* which hand she believed Dr. Perry used to touch her vagina. CV* said it was Dr. Perry's left hand. When asked for clarification, CV* said Dr. Perry inserted his fingers in and out of her vagina at least four times. When asked, CV* said Dr. Perry did not explain during the exam why he rubbed and/or inserted his fingers into her vagina. After Dr. Perry inserted his fingers into CV*'s vagina, she got up from the exam table and got dressed. When CV* walked out of the exam room she walked directly to the receptionist and advised her she was sexually assaulted.

I asked CV* if she had her sciatic nerve problem examined in the past. CV* said a chiropractor had examined her sciatic nerve pain issue in the past. I asked if the chiropractor had used his hands or fingers on her body the same way Dr. Perry used his hand and fingers. CV* said, "No." I asked CV* if she asked Dr. Perry to examine her vagina or if Dr. Perry asked for consent to touch her vagina. CV* said no to both questions.

IDENTIFICATION OF SUSPECT:

Narrative by Aranas, Christopher (continued) First Submitted: 11/08/2024 08:52

Upon conclusion of the interview, Detective P. Nguyen stepped inside the room and verbally read off an admonishment to CV* that she was going to view some photographs. CV* understood the admonishment and signed the admonishment form. Detective Nguyen showed six photographs to CV*. She viewed all six photographs and picked the adult male in the number 3 sequence and identified the person in the number 3 sequence as Dr. Perry. The same person who sexually assaulted her during her post-op medical exam.

ADDITIONAL INFORMATION:

- On 12/07/2021, I called and left message/voicemail on phone number (559)525-9088 for Dr. Victor Perry to return my phone call.
- On 12/16/2021, I called and left message/voicemail on phone number (559)525-9088 for Dr. Victor Perry to return my phone call.
- On 1/13/2022, Dr. Victor Perry called me, and I identified myself and explained I would like to talk to him regarding a sexual assault allegations. Dr. Perry said he would like to talk about the investigation, but he needed to call his attorney, and he would get back to me.
- On 1/27/2022, I called Dr. Perry and left another message for him to return my phone call.
- On 2/17/2022, I called Agent Roxanne Caldera with the California State Medical Board and advised her of the sexual assault allegations against Dr. Victor Lynn Perry 6/17/1966.

INVESTIGATION CONTINUED SUMMARY OF FRESNO PD 22007935:

On 2/16/22, I was assigned a sexual assault case documented under Fresno PD case 22007935, the incident was regarding a Confidential Victim, hereinafter referred to as CV*-2 who was sexually assaulted by Victor Lynn Perry MD, also known as Dr. Perry. CV*-2 was at St. Agnes Hospital for panic attacks and anxiety due to the sexual assault. The emergency room nurse confirmed with CV*-2 that she had been sexually assaulted. CV*-2 told the nurse she was assaulted by a doctor. After which the nurse informed the Fresno Police Department.

On 2/09/22, Fresno PD Officer J. Reed responded to the emergency room (ER) at St. Agnes Hospital. Officer Reed spoke to the Reporting Party and CV*-2. CV*-2 reiterated to Officer Reed she was sexually assaulted by Dr. Perry. She further stated the incident happened approximately five months ago (possibly in the month of September of 2021) when she was referred to Dr. Perry (a neurosurgeon) by her primary doctor. CV*-2 said she informed Dr. Perry that a massage therapist had located a mass/tumor near her upper right groin area.

Dr. Perry asked CV*-2 to undress from the waist down and to lay down on the exam table face down. CV*-2 said there was no nurse or chaperone in the room at the time of the exam, but the exam room door was open. When asked, Dr. Perry did wear (exam) gloves. As CV*-2 laid face down Dr. Perry asked her to spread her legs wide open as wide as the exam table was wide. Dr. Perry began the exam by inserting his (what CV*-2 believed to be Dr. Perry's) left hand into her vagina and rubbing his hand/fingers around the interior of CV*-2's vagina. While Dr. Perry's right hand was rubbing the exterior area of CV*-2's right hip. At that point CV*-2 asked Dr. Perry if this (procedure) was "Okay" the best way to locate the mass. Dr. Perry replied, "Yes, don't worry."

CV*-2 told Officer Reed she believed Dr. Perry was rubbing her vagina in a sexual way due to the way he ran his fingers over her vagina in a circular motion, which she believed had nothing to do with locating the mass/tumor. After about a few minutes with Dr. Perry's hand/fingers inserted in CV*-2's vagina, Dr. Perry told CV*-2 he had located the mass, that was originally located by the massage therapist. Dr. Perry advised CV*-2 that the mass/tumor was the size of a marble. (It should note the mass/tumor was originally found by a massage therapist who did not need to penetrate CV*-2's vagina.)

I attempted to have CV*-2 identify Dr. Perry in a photograph, as well as have CV*-2 view a photograph of CV*-1 to determine if they know one another. But CV*-2 said she could not deal with any more questions that it was taking a toll on her mental health.

End of synopsis.

INVESTIGATION CONTINUED/CAL DOJ BFS REPORT:

Restricted

Narrative by Aranas, Christopher (continued) First Submitted: 11/08/2024 08:52

(The following is a summary for exact and full details refer to BFS report uploaded to Axon.)

On or about July of 2022, I reviewed the California Department of Justice Bureau of Forensic Services report documented under case FR-21-004590-0001. The physical evidence examination report was completed by Senior Criminalist J. Upshaw. Criminalist Upshaw examined CV's external genitalia, vaginal and anal swabs and did not detect any male DNA.

INVESTIGATION CONTINUED/CAL DOJ BFS REPORT:

(The following is a summary for exact and full details refer to BFS report uploaded to Axon.)

On or about December of 2023, I reviewed the California Department of Justice Bureau of Forensic Services report documented under case FR-21-004590-0002. The physical evidence examination report was completed by Senior Criminalist J. Upshaw. Criminalist Upshaw examined the (CV*-1) feminine pad and swabbed the interior surface of the pad for possible deoxyribonucleic acid (DNA).

One of the swabs was extracted (from the pad) for DNA analysis. The swab was analyzed and determined to have Y-STR DNA present. Criminalist Upshaw requested a reference swab from any suspect(s).

INVESTIGATION CONTINUED:

It also should be noted that I have left several voice messages on Dr. Perry's voicemail and have only received one return phone call, in which Dr. Perry stated he would get a hold of his attorney and call me back for a date and time to answer questions, and that was on 01/13/2022.

Furthermore, Investigator K. Rodriguez with the California Department of Consumer Affairs / Medical Board Enforcement Division has also tried to contact Dr. Perry as well. However, he has yet to return her phone calls. The California Department of Consumer Affairs / Medical Board currently had an open investigation (**California Medical Board case 8002022086412**) on Dr. Perry, regarding this Fresno Police Department investigation.

INVESTIGATION CONTINUED:

On 3/15/24, I contacted the California Medical Board and spoke with Investigator K. Rodriguez who provided me with a (supposedly) updated address of Dr. Perry's medical office. I drove over to 6177 N. Thesta #103, in the city of Fresno to locate the medical office of Dr. Victor Lynn Perry. When I arrived at the Thesta address, I located suite #103 and found the office to be empty with no name/title on the office door, nor any title or name on the complex directory.

In the event Dr. Perry transferred back to his old office located at 7255 North Cedar #102, I drove to that medical building and checked suite #102, only to find it was closed but under a different doctor's name. I went next door to the open medical office and confirmed with the receptionist who stated Dr. Victor Perry was no longer working out of suite #102. The receptionist also mentioned it had been quite some time since Dr. Perry had worked in the neighboring office suite #102.

Additionally, during the month of March 2024, I had checked both last known addresses for Victor Lynn Perry. Both addresses were in the city of Fresno. I contacted the managers of both apartment complexes who each stated Victor Lynn Perry had been evicted from their respective apartments. Each manager stated Dr. Perry failed to pay rent for an extended period. Neither office manager had a forwarding address for Dr. Perry. Currently this investigator and Investigator Rodriguez with the California Department of Consumer Affairs / Medical Board are unable to locate Victor Lynn Perry, MD 6/17/66.

ADDITIONAL INFORMATION IN 2ND CASE FRESNO PD 22007935:

Towards the end of the interview with CV*-2 (in Fresno PD investigation 22007935) she told Detective Schreiner and I, she has anxiety and panic attacks, because of the sexual assault and did not want to go through with filing a criminal complaint against Dr. Perry. CV*-2 wanted to put it behind her and elevate the additional stress in her life. However, CV*-2's statement (as a second victim) corroborated Dr. Perry's heinous behavior and sexual misconduct with some of his patients. CV*-2's statement could later be used in the investigation by the prosecution. -**California Evidence Code 1108.**

Narrative by Aranas, Christopher (continued) First Submitted: 11/08/2024 08:52

INVESTIGATION CONTINUED:

As a result of the cell phone ping warrant authorized by The Honorable D. T. Tharpe, signed on 04/04/2024, I requested a DNA warrant to obtain two reference samples from Victor Lynn Perry for further DNA analysis. As it relates to the findings obtained from CV*'s sexual assault exam/kit, which was analyzed by the California Department of Justice Bureau of Forensics Services.

On 4/08/2024, The Honorable K. Nystrom-Geist signed a search warrant which authorized detectives to obtain Dr. Victor Lynn Perry's DNA.

INVESTIGATION CONTINUED:

On 4/09/2024, through my city of Fresno, department email address, I had obtained cell phone ping coordinates from AT&T. The latitude and longitude (the whereabouts of abouts of Dr. Perry's cell phone) coordinates reflected an address in the city of Kerman, specifically at 446 South 2nd Street. Therefore, assisting detectives and I responded to that location. On our arrival to the residence, we set up a loose perimeter. Prior to setting up around the South 2nd residence, I briefed assisting detectives that Dr. Perry was last seen driving a white Dodge pick-up truck near his prior residence off Shephard Ave. A few minutes after our perimeter was set, Detective Kinney communicated through his law enforcement device he observed a white Dodge pick-up truck drive by his location towards the 446 South 2nd residence.

Therefore, I drove up to the residence and observed a white Dodge pick-up truck drive up the driveway and into the garage. I drove onto the driveway and activated my emergency lights and approached the driver's side door of the truck. A white female stepped out of the driver's seat who was later identified as Dawn Marie Avila 10/20/72. I identified myself to Avila and asked if Victor Perry was inside the truck. Avila said, "No." I asked if he was inside the residence. Avila said, "Yeah." I asked her to yell into the house and have Victor step out into the garage. Avila was very cooperative and did so. Within a few seconds a black male adult (who I recognized from his California DMV photo) walked into the garage. I also confirmed via asking the adult male his name. In which he stated "Victor Perry." I confirmed Dr. Victor Lynn Perry. Perry said, "Yeah." It should be noted upon my contact in the garage with Dr. Perry I smelled a strong odor of alcohol on his breath. I advised Dr. Perry I was a detective with the Fresno Police Department, and I had a search warrant to obtain his DNA.

The tailgate of the white Dodge pick-up truck was dropped down and Dr. Perry was told to have a seat. It should be noted Dr. Perry was informed the search warrant to obtain his DNA was a result to the ongoing sexual assault investigation from a couple of years ago. It also should be noted no questions were asked relating directly to the sexual assault investigation. I asked Dr. Perry how long he had been staying at the South 2nd address. Perry replied, since about August of 2023. I asked if was working. Dr. Perry said he was working part time in Castro Valley in Dr. Doug Abeles office, off Redwood Road. I used two (department) buccal swabs and individually inserted one at a time into Dr. Perry's mouth and rubbed the swab against the inside cheek.

Prior to leaving I obtained Dr. Perry's current cell phone number (415)420-6469 and informed him, I would email him his notice of service search warrant paperwork as well as the signed search warrant, authorized by Judge K. Nystrom-Geist. Dr. Perry provided me his email address, vicperrynd@yahoo.com. After my contact with Dr. Perry, I walked over and briefly spoke to Avila. I informed Avila the investigation is confidential, but I explained the reason why I arrived at her residence, in looking for Victor Lynn Perry to obtain his DNA. due to allegations of sexually assaulting two patients. I concluded my time with Avila and thanked her for her time as well as, apologized for disrupting her morning.

I drove back to police headquarters and inputted the Dr. Perry's buccal swabs into evidence and secured them in the department's property/evidence refrigerator. I emailed B. Jennings and requested the buccal swab labeled 'for the district attorneys' (upon his schedule) be checked out and taken to the Bureau of Forensic Services crime lab for further analysis.

INVESTIGATION CONTINUED/CAL DOJ BFS REPORT:

(The following is a summary for exact and full details refer to BFS report uploaded to Axon.)

On or about August of 2024, I reviewed the California Department of Justice Bureau of Forensic Services report documented under case FR-21-004590-0001. The physical evidence examination report was completed by Senior Criminalist J. Upshaw.

Narrative by Aranas, Christopher (continued) First Submitted: 11/08/2024 08:52

Criminalist Upshaw examined the buccal swab obtained from Victor Perry against the CV's swab from the feminine pad. Per Criminalist Upshaw, due to the limited genetic information present in the Y-STR DNA allele, no comparison could be made with Victor Perry's buccal swab.

CONCLUSIONS/DEDUCTIONS:

On 09/21/2021, CV had a schedule post OP medical appointment with Dr. Victor Perry. After the initial post OP exam was completed. Dr. Perry had asked CV if anything else was bothering her. CV told Dr. Perry her sciatic nerve pain had been troubling her. Dr. Perry said he could examine the issue. As Dr. Perry performed an examination on CV's nerve pain he slid his hand in between CV's shorts, and inserted his fingers into CV's vagina, digitally penetrating her. CV was horrified and froze on the exam table. The incident lasted a few minutes, after which CV walked out of the exam room and notified the receptionist that Dr. Perry had (just) sexually assaulted her.

CV left the office and told her partner who in turn advised CV to call the police. On 9/21/2021, Officer M. Walls responded to CV's residence and contacted CV. CV told Officer Walls, her primary care physician recommend CV have a sexual assault kit/examine completed. However, CV refused and did not have an exam completed until a couple of days later. On 09/25/2021 sexual assault detectives followed up with CV and obtained a recorded video interview, as well as attempted to obtain a statement from Dr. Perry, who refused to return phone calls with a date and time for an interview. During the investigation Dr. Perry was very uncooperative and elusive.

During the investigation CV's (incontinence) pad was sent over to the California Department of Justice Bureau of Forensic Services for DNA (deoxyribonucleic) testing. The criminalist at the crime lab requested a reference (DNA) swab for comparison. However, detectives were unable to locate Dr. Perry. Subsequently, Dr. Perry's cell phone was pinged through an authorized search warrant. Additionally, a second warrant was authorized/issued to obtain Dr. Perry's DNA. On 4/09/2024, Dr. Perry was located residing in the city of Kerman. Fresno Police Department Sexual Assault Detectives contacted Dr. Perry and served him with the DNA search warrant. During the search warrant service two swabs were collected. The swabs were sent to the California Department of Justice Crime Laboratory for analysis. The outcome of the swab testing was inconclusive.

Additionally, based on Victor Lynn Perry's pattern of life between the years of 2021 to 2024, it is this investigator's belief that Dr. Victor Lynn Perry was being elusive and deceptive with the Fresno Police Department as well as the California Department of Consumer Affairs / Medical Board.

Subsequently, based off statements from both CV's as it relates to the secondary incident documented under Fresno PD case 22007935. Dr. Victor Lynn Perry is in violation of sexual penetration upon two different patients. The investigation will be forward to the Fresno County District Attorney's Office for review.

DISPOSITIONAL INFORMATION:

Follow up to original report.

Refer to additional follow-ups.

Related Fresno PD sexual assault case 22007935.

This investigation is ongoing.

Fresno Police Dept - CA
Incident 21051895 - Evidence List

Name	Description	Type
------	-------------	------

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit G

Declaration and CV of Parham Yashar, M.D. and attached report dated October 15, 2024.

1 ROB BONTA
Attorney General of California
2 STEVE DIEHL
Supervising Deputy Attorney General
3 SARAH J. JACOBS
Deputy Attorney General
4 State Bar No. 255899
2550 Mariposa Mall, Room 5090
5 Fresno, CA 93721
Telephone: (559) 705-2320
6 Facsimile: (559) 445-5106
E-mail: Sarah.Jacobs@doj.ca.gov
7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:	Case No. 800-2022-086412
12	OAH No. 2025040324
13 VICTOR LYNN PERRY, M.D.	DECLARATION OF PARHAM
14	YASHAR, M.D.
15 Respondent.	

16
17 I, Parham Yashar, M.D. declare:

18 1. I am a physician licensed to practice medicine in California under Medical Board of
19 California Physician's and Surgeon's Certificate No. A100139. I am board certified in both
20 neurological surgery and CNS endovascular surgery. From 2020 to present, I have been
21 employed as the Medical Director of the NHMC Stroke Program. My curriculum vitae is
22 attached to this declaration and incorporated by reference as if fully set forth herein.

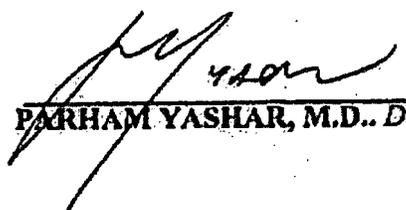
23 2. On or about October 2024, I reviewed the practice of Dr. Victor Lynn Perry, M.D.
24 regarding two patients, on behalf of the Medical Board of California as an expert consultant.
25 Based upon my review of the medical records, certified police reports, and other investigation
26 materials provided to me, I determined that Dr. Perry was grossly negligent in his care and
27 treatment of both patients.

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3. On or about October 15, 2024, I authored an expert report in this matter, which is attached to this declaration and incorporated by reference as if fully set forth herein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed in Los Angeles, CA, USA on January 9, 2026.


PARHAM YASHAR, M.D., Declarant

FR2024305212
95674542.docx

DOCSHEALTH

Parham Yashar, MD, FACS, FAANS, FCNS
Fellowship-Trained and Double Board-Certified
Brain, Spine, and (CNS) Endovascular Neurosurgery
py@docshealth.com | TEL: 424-209-2669 | FAX: 310-602-6502

Current Positions

- 8/2020 – *Medical Director*, NHMC Stroke Program
- 11/2021 – *Expert Reviewer* and Consultant, Medical Board of California and Department of Justice (DOJ)

Board Certifications

- 12/2018 Neurological Surgery – ABNS
- 06/2021 CNS Endovascular Surgery – ABNS/ABR/ABPN

Academic Affiliations

- 7/2019 – Department of Neurological Surgery, USC– Keck School of Medicine
Adjunct Assistant Professor of Neurological Surgery (Voluntary)

Education

- 8/1996 – University of California, Los Angeles (Los Angeles, CA)
- 6/2000 Bachelor of Science (B.S.) with Departmental Honors, Cybernetics
Minor, Education Studies
Summa Cum Laude
- 8/2000 – Northwestern University – The Feinberg School of Medicine
5/2005 Chicago, IL
Degree: Doctor of Medicine (M.D.)
- 6/2005 – Montefiore Medical Center/Albert Einstein College of Medicine
7/2006 Department of Surgery (Bronx, NY)
Intern, General Surgery
- 7/2006 – Montefiore Medical Center/Albert Einstein College of Medicine
1/2007 Department of Neurological Surgery (Bronx, NY)
Resident, Neurological Surgery
- 7/2010 – Kaleida Health / Millard Fillmore Gates Hospital
6/2011 University at Buffalo, Department of Neurosurgery (UBNS; Buffalo, NY)
Fellow, CNS Endovascular Surgery
- 1/2007 – LA County + USC Medical Center, Keck Department of Neurological Surgery
6/2012 Los Angeles, CA
Resident, Neurological Surgery, 2007-2012
Chief Resident and Resident Supervisor, Neurological Surgery, 2012

Examination Completion

- 3/2010 American Board of Neurological Surgery, Written Exam
- 11/2018 American Board of Neurological Surgery, Oral Exam
- 6/2020 American Board of Neurological Surgery, CNS Endovascular Recognition of Focused Practice (RFP) Written Exam

State Medical Board Licensures

- 05/2007 California Medical Board, License # A100139

DOCSHEALTH

07/2010 Granted 05/18/2007, Expires 04/30/2025
New York State Education Department, License # 257922
Granted 07/16/2010, Expires 03/31/2026

Current Hospital Privileging

07/2012 – Henry Mayo Newhall Hospital (Valencia, CA) – Level 2 Trauma Center
10/2012 – Northridge Hospital Medical Center (Northridge, CA) – Level 2 Trauma Center
12/2012 – Providence St. Joseph Medical Center (Burbank, CA)
12/2013 – Mission Community Hospital (Panorama City, CA)
04/2014 – Los Robles Hospital and Medical Center (Thousand Oaks, CA) – Level 2 Trauma Center
09/2015 – Kaleida Health/Buffalo General Hospital (Buffalo, NY)
12/2016 – Cedars-Sinai Medical Center (Los Angeles, CA)
05/2017 – Providence St. John's Health Center (Santa Monica, CA)
07/2019 – Dignity Health - Mercy Medical Center Redding (Redding, CA) – Level 2 Trauma Center
12/2019 – St. Peter's Health Partners (Albany, NY)
07/2020 – Adventist Health Glendale (Glendale, CA)
01/2021 – DOCS Surgical Hospital (Los Angeles, CA)
08/2021 – St. Joseph Hospital Orange (Orange, CA)
10/2022 – WMC Health, MidHudson Regional Hospital (Poughkeepsie, NY)
08/2023 – Valley Presbyterian Hospital (Van Nuys, CA)

Surgical Center Affiliations

K&B Surgical Center (Beverly Hills, CA)
Spalding Multi-Specialty Surgery Center (Beverly Hills, CA)
Sherman Way Surgery Center (Reseda, CA)
Radiance Surgery Center (Sherman Oaks, CA)
DOCS Surgery Center (Los Angeles, CA)

Society Memberships

10/2012 Congress of Neurological Surgeons (CNS), *Member and Fellow* (FCNS)
06/2014 American Association of Neurological Surgeons (AANS), *Active Member and Fellow* (FAANS)
01/2019 American College of Surgeons (ACS), *Fellow* (FACS)
01/2019 American Heart Association (AHA), *Member*
10/2019 Society for Neuro-Interventional Surgery (SNIS), *Senior Member*

Honors and Awards

1996-2000 Provosts' Honors List, UC Los Angeles
1999 Phi Beta Kappa Honor Society, UC Los Angeles
2000 College Honors, College of Letters and Science, UC Los Angeles
2000-2002 Sephardic Temple Tifereth Israel, Maurice Amado Scholarship Recipient

Medical School and University Service (Feinberg School of Medicine; UCLA)

1996-2000 Athletic Tutorials, UC Los Angeles
Tutor and Tutor Supervisor in Biology, Chemistry, and Statistics
2000-2001 American Medical Student Association (AMSA)

OFF 424.209.2669
FAX 310.602.6502
py@docshhealth.com
Page 2 | 8

AGO-000180

DOCSHEALTH

- Chapter Treasurer
2000-2001 *Dura Mater*, Feinberg School of Medicine's First Humor Magazine
Assistant Editor and Writer
2001-2002 American Medical Student Association (AMSA)
Chapter Co-President
2001-2002 Feinberg School of Medicine Student Senate
Student Representative/Senator for Kelly College, Class of 2004
2001-2002, Loyal Davis Surgical Society, Student Coordinator
2003-2004
2004 Neuroanatomy Laboratory, Feinberg School of Medicine
Teaching Assistant
2010 Neuroanatomy Laboratory, USC – Keck School of Medicine
Teaching Assistant

Peer-Reviewed Publications

Chandler JP, **Yashar P**, Läsikin WB, Russell EJ. Intracranial chondrosarcoma: a case report and review of the literature. *Journal of Neurooncology*, May 2004, 68(1):33-39. PMID: 15174519

Parkinson RJ, Bendok BR, Getch CC, **Yashar P**, Shaibani A, Ankenbrandt W, Awad IA, Batjer HH. Retrograde suction-decompression of a giant paraclinoid aneurysm using a No. 7 French balloon-containing guide catheter. Technical Note. *Journal of Neurosurgery*, September 2006, 105(3):479-81. PMID: 16961148

Yashar P, Sepahdari AR, Mahjoubi FD. Primary squamous cell carcinoma of the breast in a woman. *The Breast Journal*, December 2006, 12(6):571-572. PMID: 17238990

Song YD, Lee EJ, **Yashar P**, Pfaff LE, Kim SY, Jameson JL. Islet cell differentiation in liver by combinatorial expression of transcription factors Neurogenin-3, BETA2, RIPE3b1. *Biochemical and Biophysical Research Communications*, March 2007, 354(2):334-339. PMID: 17239820

Langevin JP, Bergsneider M, **Yashar P**, Makary RF. Waldenström's macroglobulinemia and large B-cell central nervous system lymphoma: a case report. *Surgical Neurology*, April 2008, 69(4):407-410. PMID: 18262236

Yashar P*, Cho MA*, Kim SK, Noh T, Gillam MP, Jameson JL, Lee EJ. HoxD10 gene delivery using adenovirus/adenovirus-associate hybrid virus inhibits the proliferation and tumorigenicity of GH4 pituitary lactotrope tumor cells. *Biochemical and Biophysical Research Communications*, July 2008, 371(3):371-4. PMID: 18442473. *co-first authorship

Sivakumar W, Zada G, **Yashar P**, Giannotta SL, Teitelbaum GP, Larsen DW. Endovascular management of spinal dural arteriovenous fistulas: A review. *Neurosurgical Focus*, May 2009, 25(5): E15. PMID: 19408993

Yashar P, Amar AP, Giannotta SL, Yu C, Pagnini PG, Liu CY, Apuzzo ML. Cerebral arteriovenous malformations: Issues of the interplay between stereotactic radiosurgery and endovascular surgical therapy. *World Neurosurgery*, 75(5-6):638-47, 2001. PMID: 21704930

DOCSHEALTH

- Yashar P, Kan PT, Levy EI:** Horizontal Deployment of an Intracranial Stent via an Antegrade Approach for Coil Embolization of a Basilar Apex Aneurysm: Technical Note. *Journal of NeuroInterventional Surgery* (epub February 23, 2011 DOI 10.1136/jnis.2010.004481 PMID: 21990458
- Kan P, Yashar P, Chamczuk AJ, Levy EI, Hopkins LN, Siddiqui AH:** Letter to the Editor: Multimodal Treatment of Co-existent Callosal Cavernous Malformation and Anterior Communicating Artery Aneurysm Associated with an Infraoptic Anterior Cerebral Artery. *Neuroradiology* 54(2): 181-3, 2012. PMID: 21556861
- Kan PT, Snyder KV, Yashar P, Siddiqui AH, Hopkins LN, Levy EI.** Utility of CT perfusion scanning in patient selection for acute stroke intervention: Experience at University at Buffalo Neurosurgery – Millard Fillmore Gates Circle Hospital. *Neurosurgical Focus* 30(6):E4, June 2011 (epub June 1, 2011 DOI 10.3171/2011.2.FOCUS1130) PMID:21631228
- Binning MJ, Yashar P, Orion D, Hauck EF, Levy EI, Hopkins LN, Siddiqui AH.** Use of the outreach distal access catheter for microcatheter stabilization during intracranial arteriovenous malformation embolization. *AJNR Am J Neuroradiol* (in press, 2011) (epub July 14, 2011 DOI 10.3174/ajnr.A2547) PMID:21757517
- Binning MJ, Orion D, Yashar P, Webb S, Ionita CN, Jain A, Rudin S, Hopkins LN, Siddiqui AH, Levy EI.** Use of the micro-angiographic fluoroscope for coiling of intracranial aneurysms. *Neurosurgery*, 69(5): 1131-8, November 2011. PMID: 21694658
- Kan P, Yashar P, Langer DJ, Siddiqui AH, Levy EI.** PICA-to-PICA in situ bypass for treatment of bow hunter's type dynamic ischemia in holovertebral dissection. *World Neurosurgery* 1 Nov 2011 (epub, ahead of print) PMID: 22120571
- Waldau B, Turk AS III, Yashar P, Khaldi A, Turner RD IV, Chaudry MI, Siddiqui AH, Levy EI, Hoh BL, Mocco J.** Perioperative safety of hydrosoft coils. *J Neurointerv Surg* (epub 17 October 2011, DOI 10.1136/neurintsurg-2011-010106). PMID: 21990538
- Webb SW, Yashar P, Kan P, Siddiqui AH, Hopkins L, Levy EI.** Treatment and Outcomes of Acute Intracranial Vertebrobasilar Artery Occlusion: One Institution's Experience. *Journal of Neurosurgery*, 116(5):952-60, May 2012. PMID: 22304447
- Kan P, Yashar P, Ionita CN, Jain A, Rudin S, Levy EI, Siddiqui AH.** Endovascular coil embolization of a very small ruptured aneurysm using a novel microangiographic technique. Technical note. *J Neurointerv Surg* 5:e2, March 2013 (epub January 21, 2012 DOI 10.1136/neurintsurg-2011-010154). PMID: 22266790
- Yashar P, Zada G, Harris B, Giannotta SL.** Extent of resection and early postoperative outcomes following resection of cystic vestibular schwannomas: surgical experience over a decade and review of the literature. *Neurosurgical Focus* 33(3):E13, Sep 2012. PMID: 22937847
- Kan P, Jahshan S, Yashar P, Orion D, Webb S, Siddiqui AH, Hopkins LN, Levy EI:** Feasibility, Safety, and Periprocedural Complications Associated with Endovascular Treatment of Selected Ruptured Aneurysms Under Conscious Sedation and Local Anesthesia. *Neurosurgery* 72:216-

DOCSHEALTH

220, February 2013 (epub November 10, 2012 DOI 10.1227/NEU.0b013e31827b9183). PMID: 23149970

Kass-Hout T, Kass-Hout O, Mokin M, Thesier DM, **Yashar P**, Orion D, Jahshan S, Hopkins LN, Siddiqui AH, Snyder KV, Levy EI: Is Bridging with Intravenous Thrombolysis of Any Benefit in Endovascular Therapy for Acute Ischemic Stroke? *World Neurosurg* (epub January 31, 2013 DOI 10.1016/j.wneu.2013.01.097). PMID: 23376392

Zada G, **Yashar P**, Robison A, Winer J, Khalessi A, Mack WJ, Giannotta SL. A proposed grading system for standardizing tumor consistency of intracranial meningiomas. *Neurosurgical Focus* 35(6):E1, December 2013. PMID: 24289117.

Shakir HJ, Rooney PJ, Ranjel-Castilla L, **Yashar P**, Levy EI. Treatment of iatrogenic V2 segment vertebral artery pseudoaneurysm using Pipeline flow-diverting stent. *Surg Neurol Int* 7: 104. December 2016. (epub December 20, 2016. DOI 10.4103/2152-7806.196235.) PMID: 28168090

Fanous A, **Yashar P**, Sonig A, Zakeri A, Snyder KV, Levy EI, Davies JM, Siddiqui AH. Endovascular stenting of tandem carotid artery origin and bifurcation stenotic lesions using flow reversal. *J Vasc Interv Neurol* 9:33-41. October 2017. PMID: 29163747

Balboni JM, Siddique K, Nomoto EK, Wong AP, **Yashar P**, Hill PS, Smith R, Perri K, Perri BR. Novel use of robotics and navigation for anterior lumbar total disc replacement surgery. *N Am Spine Soc J* 9: 100097. January 2022 PMID: 35141661

Srinivasan VM, et al., **Yashar P**, et al., Kan P. Retreatment of residual and recurrent aneurysms after embolization with the woven endobridge device: Multicenter case series. *Neurosurgery* March 8: epub Online ahead of print. PMID: 35244028

Invited Publications

Kan PT, Orion D, **Yashar P**, Levy EI: Intra-arterial Thrombolysis for Acute Ischemic Stroke: Technique and Results. *J Neurosurg Sci* 55(2):151-160, June, 2011. PMID: 21623327

Yashar P, Hopkins LN. Instrumentation in Neurosurgery – Nurturing the trend towards minimalism. *World Neurosurgery*: in press September/October 2013 (ePub November 23, 2011 DOI 10.1016/j.wneu.2011.11.009 PMID: 22381330

Book Chapter

Yashar P, Natarajan SK, Kan PT, Snyder KV, Levy EI, Hopkins LN, Siddiqui, AH: Acute Stroke Interventions (Chapter 15). A. Surgical Technique – Carotid Endarterectomy. B. Endovascular Techniques. In Jabbour P (Ed): *Neurovascular Surgical Techniques*. New Delhi (India), Jaypee Brothers Medical Publisher (in press, 2012), pp 272-296.

Abstracts/Presentations

Mathern GW, **Yashar P**, Andre V. Neo Timm's staining in human hippocampi from TLE patients: It is always associated with hippocampal sclerosis and progressively increases with longer seizure duration. American Epilepsy Society, 56th Annual Meeting December 6-11, 2002 [abstract 3.040]

DOCSHEALTH

Koski T, Salehi SA, O'Shaughnessy BA, Yashar P, Le TA, Ondra SL. Analysis of cranio-cervical sagittal balance and their relationships to the remainder of the spinal column. Poster. Cervical Spine Research Society, Boston, MA, USA. December 9-11, 2004. [Poster: 32]

Yashar P. UCLA Division of Neurosurgery, Grand Rounds. Clinical Case Presentation. Pineocytoma in a 4-year-old girl. Review of surgical approaches and treatment modalities. November 10, 2004.

Yashar P, Park SY, Lee EJ, Jameson JL. HoxD10 suppresses prolactinoma tumorigenesis by inhibiting expression of angiogenic factors. Poster. AANS Annual Meeting, New Orleans, LA, USA. April 15-20, 2005. [ID: 25061]

Yashar P, Chandler JP. Lumbar drain placement resulting in reversible primary intracranial hypotension with coma: Report of 2 cases. Poster. AANS Annual Meeting, New Orleans, LA, USA. April 15-20, 2005. [ID: 25043]

Yashar P, Houten JK. Distinctive characteristics of T10-12 thoracic spondylosis. Poster. AANS Annual Meeting, San Francisco, CA, USA. April 17-22, 2006. [ID: 36304]

Yashar P, Alzate JC, LaSala P, Weidenheim KM. Skull sarcoidosis presenting as lytic lesions mimicking a metastatic neoplasm: A difficult pre-operative diagnosis. Poster. AANS Annual Meeting, Washington, DC. April 14-19, 2007. [ID: 42915]

Yashar P, Berry C, Zada G, McComb JG. Ventriculo-pleural shunts in Children: A single institution's 30-year experience. AANS Annual Meeting, San Diego, CA. May 4, 2009. [ID: 54573]

Yashar P, Berry C, Zada G, Krieger MD, McComb JG. Ventriculo-pleural shunts: A single institution's 30-year experience. International Society for Pediatric Neurosurgery Annual Meeting, Pasadena CA. October 11-15, 2009.

Yashar P, Binning MJ, Orion D, Hauck EF, Levy EI, Hopkins LN, Siddiqui AH. Novel use of the Outreach distal access catheter for microcatheter stabilization during intracranial arteriovenous malformation embolization. e-Poster, AANS Annual Meeting, Denver, CO. April 9-13, 2011. [Abstract: 1528]

Binning MJ, Yashar P, Orion D, Webb S, Ionita CN, Jain A, Rudin S, Hopkins LN, Siddiqui AH, Levy EI. Use of the micro-angiographic fluoroscope for coiling of intracranial aneurysms. e-Poster, AANS Annual Meeting, Denver, CO. April 9-13, 2011. [Abstract: 1220]

Kan PT, Jahshan S, Yashar P, Orion D, Webb S, Siddiqui AH, Hopkins LN, Levy EI: Feasibility, Safety, and Periprocedural complications associated with endovascular treatment of ruptured aneurysms under conscious sedation and local anesthesia (Abstract 917). Oral presentation. *Congress of Neurological Surgeons Annual Meeting*, Washington, DC; October 3, 2011; 2:24-2:33pm.

Yashar P, Durkin R, Lucas J, Giannotta SL. Cystic vestibular schwannomas: Experience over the last 10 years (Abstract 1393). ePoster. *Congress of Neurological surgeons Annual Meeting*, Washington, DC; October 1-6, 2011.

DOCSHEALTH

Webb S, **Yashar P**, Kan P, Siddiqui AH, Hopkins LN, Levy EI: Treatment and Outcomes of Acute Vertebrobasilar Artery Occlusion: One Institution's Experience (abstract 31). Accepted for Interactive Oral Poster Presentation, CNS Neurosurgical Forum of the Section on Cerebrovascular Surgery Neurosurgical Forum, *Congress of Neurological Surgeons Annual Meeting*, Washington DC; October 1-6, 2011. (Oral presentation. October 3, 2011; 12:00-1:30pm).

Kan P, **Yashar P**, Ablal A, Dumont T, Siddiqui A, Levy E, Jahshan S, Dhillon G. Diagnostic utility of 3T contrast-enhanced MR angiography compared with digital subtraction angiography for intracranial aneurysms treated with stent-assisted coiling. *American Association of Neurological Surgeons Annual Meeting*, April 13, 2012. Abstract: AA-22259

Zada G, **Yashar P**, Khalessi A, Mack W, Liu C, Giannotta S. A proposed grading system for standardizing tumor consistency of intracranial meningiomas. *American Association of Neurological Surgeons Annual Meeting*. April 26, 2013. Abstract: AA-25158

Harris B, Zada G, Fishback D, **Yashar P**, Giannotta S. Surgical management of cystic vestibular schwannoma: long-term follow-up and comparison of clinical outcomes to solid vestibular schwannoma. *American Association of Neurological Surgeons Annual Meeting*. April 26, 2013. Abstract: AA-25231

Yashar P, Ng D, Yamin A, Vinters H. Rare intracranial atypical melanocytic neoplasm in a young woman. *American Association of Neurological Surgeons Annual Meeting*. May 2, 2015. Washington DC. Abstract: AA-32206.

Melamed E, **Yashar P**, Christian EA, Berry C, McComb JG. Patient age as a risk factor for revision of ventriculopleural shunt. *The Seventh Meeting of the International Society for Hydrocephalus and CSF Disorders*. September 19-21, 2015.

Melamed EF, Christian E, Krieger MD, Berry C, **Yashar P**, McComb JG. Age as a novel risk factor for revision of ventriculopleural shunt in pediatric patients. *Neurosurgery* 63 (suppl 1): 178-179. August 2016.

Srinivasan V, Dmytriw A, Regenhardt R, Vicenty-Padilla J, Aziz-Sultan M, Patel A, Alotaibi N, Levy E, Waqas M, Cherian J, Johnson J, Jabbour P, Sweid A, Gross B, Starke R, Puri A, Massari F, Griessenauer C, Catapano J, Rutledge C, Tanweer O, **Yashar P**, Cortez G, Hanel R, Ducruet A, Albuquerque F, Lawton M, Kan P. Retreatment of residual and recurrent aneurysms following embolization with the woven endobridge (WEB) device: multicenter case series. *J Neurointerventional Surg*. Aug 2021, 13 (Suppl 1) A150-A151.

Reviewer Board – ad hoc

Journal of Neuro-Interventional Surgery (Official Journal—Society for Neuro-Interventional Surgery)

Neurosurgery (Official Journal—Congress of Neurological Surgeons)

Journal of Neurology, Neurosurgery, and Psychiatry

World Neurosurgery (Official Journal—World Federation of Neurosurgical Societies)

Current Medical Imaging (formerly, *Current Medical Imaging Reviews*)

OFF 424.209.2669
FAX 310.602.6502
py@docshealth.com
Page 7 | 8

AGO-000185

DOCSHEALTH

Textbook Editorship

Visnjevac, Ognjen; Ma, Frederick. (Ed.) 2010. *100 Questions Every Patient Should Ask Before Surgery*. Apple-A-Day Books, USA.

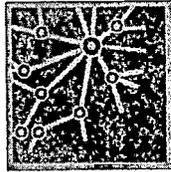
Textbook Reviewerships

Lin, Frank P.; Uzelac, Peter S. (Ed.) 2005. *SOAP for Neurology*. Lippincott Williams & Wilkins, PA, USA.

Brillman, Jon; Kahan, Scott. (Ed.) 2005. *In a Page: Neurology*. Blackwell Publishing, MA, USA.

Drislane, Frank W.; Benatar, Michael; Chang, Bernard S.; et al. (Ed.). 2006. *Blueprints Neurology*. Lippincott Williams & Wilkins, PA, USA.

Last updated: 2024-09-05



**YASHAR
NEUROSURGERY**

Parham Yashar, MD, FACS, FAANS
Diplomate, American Board of Neurological Surgery
Board Certified, CNS Endovascular Surgery
Brain, Spine, and Endovascular Neurosurgeon

Tuesday, October 15, 2024

Kayla Rodriguez

Medical Board of California

2535 Capitol Oaks Drive, Suite 220

Sacramento, CA 95833

916-217-7435

Re: Victor L. Perry, MD

Patients: LG (hereinafter "Patient 1") DOB 7/14/1968

DW (hereinafter "Patient 2") DOB 11/30/1966

Case: 800-2022-0866412

I have been asked by the Medical Board of California to review the following records in preparation for my expert review of the above-mentioned case.

MATERIALS REVIEWED

1. Expert Letter 9/27/2024
2. Attachment 01 - Fresno PD report 21-051895-1 (4 pages)
3. Attachment 02 - Fresno PD report 22-007935 (5 pages)
4. Attachment 12 - Email to Dr. Perry from RS (1 page)
5. Attachment 13 - 12 Certified pages of medical records for Ms. Gonzales from OMNI Family Health (12 pages)

6. Attachment 16 – Contact letter sent to Dr. Perry (8 pages)
7. Attachment 18 – Letter mailed to new AOR (9 pages)
8. Attachment 20 – Weber medical records (4 pages)
9. Attachment 21 – Gonzales medical records (12 pages)
10. Attachment 22 – Certification pages emailed (2 pages)
11. Attachment 23 – Request or subject interview (1 page)
12. Attachment 27 – Notification of violations and imposition civil penalties (21 pages)
13. Attachment 28 – SAT for Dr. Perry (2 page)
14. Attachment 29 - Declaration of service from Detective Aranas (1)
15. Division of Investigation – HQIU – Report of Investigation

SUMMARY OF CASE 1 :

Patient 1 was a 52-year-old women who, according to the medical records, was referred to Dr. Victor L Perry by Dr. Hernandez. She presented with neck pain, with bilateral shoulder radiation, along with arm and hand weakness, numbness. Her physical exam findings were significant for pathologic reflexes and increased reflexes. Her MRI imaging studies were reviewed by Dr. Perry who noted congenital fusion at C5-6, with central and foraminal stenosis at C4-5 and C6-7 along with signal change within the spinal cord. She was given a diagnosis of myelopathy and recommended C4-5 and C6-7 ACDF (anterior discectomy and fusion) surgery.

On 9/13/2021, Patient 1 underwent an uncomplicated C4-5 and C6-7 ACDF surgery. She was discharged home.

Her first follow up with Dr. Perry occurred on 9/21/2021. According to the medical records, she was noted to have improvement in her upper extremity symptoms. She was experiencing continued low back pain, weakness. Physical exam findings documented included GU/RECTAL: PFM spasticity, and spasticity at the hip joints bilaterally.

Further records provided indicate that during the course of the examination of Patient 1 by Dr. Perry, there was inappropriate contact of her groin and genital region, including penetration of her vagina with what she felt were the fingers of Dr. Perry. She met with her friend Ms. Martinez after the evaluation. She informed the office staff Andrea about the inappropriate encounter and violation. She also presented to her primary care physician office at OMNI for evaluation. The Fresno Police Department was notified, and a police report was also filed on 9/21/2021.

SUMMARY OF CASE 2 :

Patient 2 was a 54-year-old woman who was referred to the office of Dr. Victor L Perry by Dr. Iyer. She presented to the office with low back pain radiating to the lower extremities, worse on the right side with associated numbness in the toes. She also reported occasional neck pain, bilateral shoulder, arm, hand pain along with weakness and numbness. Her past history with significant for spinal cord stimulator implantation by another neurosurgeon. The physical exam findings including musculoskeletal exam which documents full range of motion in the lower extremities along with pain limited movement, diminished strength, pain on palpation. The medical record on this visit indicates a diagnosis of chronic pain syndrome, status post spinal cord stem editor placement by another provider. The plan included to follow up with an orthopedic surgeon for treatment of trochanteric bursitis.

A follow-up evaluation is documented on 12/16/2021. No neurosurgical intervention was indicated at that time. The patient was recommended to be evaluated and managed by chronic pain specialist and for neurosurgical follow-up as clinically indicated.

Follow-up visit is documented on 1/6/2022. This is noted to be a telemedicine evaluation. No neurosurgical intervention was indicated at that time. It is noted that Dr. Parry agrees with plans for evaluation at Stanford for higher level of care evaluation. No further follow-up was felt to be necessary in the office of Dr.Perry.

A police report is noted to have been filed on 2/9/2022 by the Fresno Police Department. The records are available for review, but in brief Patient 2 reports that "around 5 months ago" she was evaluated by Dr. Perry in his office. During the course of the evaluation, she reports that Dr. Peary was "sexually rubbing her vagina in a circular motion." She reports that this continued for approximately 5 minutes. She reports that a marble sized tumor was noted between her hip and groin area on her right leg, which was not documented in her medical record.

MEDICAL ISSUES:

1. Sexual and Professional misconduct
 - Standard of care:
 - The standard of care for conducting physical examinations revolves around clear ethical and professional guidelines in order to protect and ensure patient safety, dignity and consent. Especially with regard to issues of sexual/genital evaluation, the standard of care for conducting such a physical examination includes informed consent, use of a chaperone, clear communication, respecting patient boundaries, appropriate documentation, cultural/religious sensitivity, and responding to any concerns from the patient.
 - Analysis:
 - Patient 1 and Patient 2 provided statements documented in police report provided to the Fresno Police Department indicating inappropriate contact and sexual assault allegations against Dr. Victor Perry.

- Conclusion:
 - If the above allegations by Patient 1 and Patient 2 are true, this would constitute an extreme departure from the standard of care and would also establish a pattern of inappropriate sexual assault by a physician during the course of his examination of these 2 patients.



Parham Yashar, MD FACS
Double Board-Certified in Neurological Surgery (ABNS) and CNS Endovascular Surgery
(ABNS/ABR/ABPN)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit H

Certification of Costs: Declarations of Sarah J. Jacobs and Michel Veverka

1 ROB BONTA
Attorney General of California
2 STEVE DIEHL
Supervising Deputy Attorney General
3 SARAH J. JACOBS
Deputy Attorney General
4 State Bar No. 255899
2550 Mariposa Mall, Room 5090
5 Fresno, CA 93721
Telephone: (559) 705-2320
6 Facsimile: (559) 445-5106
E-mail: Sarah.Jacobs@doj.ca.gov
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

Case No. 800-2022-086412

OAH No. 2025040324

13 **VICTOR LYNN PERRY, M.D.**

**CERTIFICATION OF
PROSECUTION COSTS:
DECLARATION OF SARAH J. JACOBS**

14 Respondent.

[Business and Professions Code, section 125.3]

15
16
17 I, SARAH J. JACOBS, hereby declare and certify as follows:

18 1. I am a Deputy Attorney General employed by the California Department of Justice
19 (DOJ), Office of the Attorney General (Office). I am assigned to the Health Quality Enforcement
20 Section in the Civil Division of the Office. I have been designated as the representative to certify
21 the costs of prosecution by DOJ and incurred by the Medical Board of California in this case. I
22 make this certification in my official capacity and as an officer of the court and as a public
23 employee pursuant to Evidence Code section 664, except for where based on information and
24 belief, I have personal knowledge of the items stated herein. If called to testify, I could and
25 would competently testify thereto.

26 2. I represent the Complainant, Reji Varghese, Executive Director of the Medical Board
27 of California, in this action. I was assigned to handle this case on or about November 15, 2024.
28

1 3. Our Office's computerized case management system reflects that the following
2 persons have also performed tasks related to this matter: Deputy Attorney General Sarah Jacobs,
3 Supervising Deputy Attorney General Steve Diehl, Analyst Phillip Deters, Paralegal Carolyn
4 Yohn, Supervising Deputy Attorney General Michael Brummel, Deputy Attorney General Jade
5 Wolansky, Paralegal Monica Loera.

6 4. I am familiar with the time recording and billing practices of DOJ and the procedure
7 for charging the client agency for the reasonable and necessary work performed on a particular
8 case. It is the duty of the time keeping employees to keep track of the time spent and to report
9 that time in DOJ's computerized case management system at or near the time of the tasks
10 performed.

11 5. On November 12, 2025, I requested a billing summary for this case from the
12 Accounting Department of the DOJ. In response, on November 12, 2025, I received a document
13 entitled "Matter Time Activity by Professional Type." I hereby certify that the Matter Time
14 Activity by Professional Type, attached hereto as Exhibit A, and herein incorporated by
15 reference, is a true and correct copy of the billing summary for this matter that I received from the
16 Accounting Department. The summary includes the billing costs incurred by me, as well as other
17 professionals of the DOJ who worked on the matter; and sets forth the tasks undertaken, the
18 amount of time billed for the activity, and the billing rate by professional type. The billing
19 summary is comprehensive of the charges by the Office to the Medical Board of California
20 through November 12, 2025. It does not include billing for tasks performed after November 12,
21 2025, up to the date of hearing, including the estimated costs that will be charged to the Medical
22 Board of California as more fully discussed in paragraph 7 below.

23 6. Based upon the time reported through November 12, 2025, as set forth in Exhibit A,
24 DOJ has billed the Medical Board of California \$36,894.25 for the time spent working on the
25 above entitled case.

26 7. In addition to the time set forth above, it is my good faith estimate that the following
27 additional hours were or will be incurred and billed to the Medical Board of California for the
28 further preparation of the case up to the commencement of the hearing.

	<u>Employee/ Position</u>	<u>Fiscal Year</u>	<u>No. of Hours</u>	<u>Hourly Rate</u>	<u>Total Charges</u>
1	Sarah Jacobs	2025	12.00	228	\$2,736.00
2	Deputy Attorney				
3	General				
4					Subtotal: \$2,736.00
5					
6					TOTAL COSTS BILLED: \$39,631.25

- 8. The total costs to be billed in this matter are: \$39,631.25
- 9. To the best of my knowledge the items of cost set forth in this certification are correct and were necessarily incurred in this case.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 12, 2025, in the City of Fresno, California.



 SARAH J. JACOBS
 Deputy Attorney General
 Declarant

FR2024305212
95668561.docx

Exhibit A

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Cost of Suit Summary

As of Nov 12, 2025

MatterID: FR2024305212 Date Opened: Nov 14, 2024 Total Legal Costs: \$36,894.25
 Description: Perry, Victor Lynn, M.D. (Acc)(6412) Cost of Suit: \$275.00
 Grand Total: \$37,169.25

Totals include WIP time.

Rate	Hrs Wrkd	Amount
Matter Time Activity Summary		
Analyst		
2025-2026		
\$202.00	0.25	\$50.50
Total For: 2025-2026		\$50.50
Total for: Analyst		\$50.50
Attorney		
2025-2026		
\$228.00	45.25	\$10,317.00
Total For: 2025-2026		\$10,317.00
2024-2025		
\$228.00	103.50	\$23,598.00
Total For: 2024-2025		\$23,598.00
Total for: Attorney		\$33,915.00
Paralegal		
2025-2026		
\$213.00	3.50	\$745.50
Total For: 2025-2026		\$745.50
2024-2025		
\$213.00	10.25	\$2,183.25
Total For: 2024-2025		\$2,183.25
Total for: Paralegal		\$2,928.75

Entry No	Journal Date	Vendor #	Vendor	Schedule	Reference	Amount
Cost of Suit						
03573						
2025-2026						
Contract						
307916916	10/21/25	000054244	City Of Fresno	251200R	WITNESS FEE	\$275.00
Totals For: Contract						\$275.00
Totals For: 2025-2026						\$275.00
Totals For: 03573						\$275.00
Cost of Suit Total:						\$275.00
* Denotes soft costs which are not included in totals.						

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Cost of Suit Summary

As of Nov 12, 2025

MatterID: FR2024305212
Description: Perry, Victor Lynn, M.D. (Acc)(6412) Date Opened: Nov 14, 2024

Total Legal Costs: \$36,894.25
Cost of Suit: \$275.00
Grand Total: \$37,169.25

Rate	Hrs Wrkd	Amount
Matter Time Activity Summary		
Total Legal Costs		\$36,894.25

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Matter ID: FR2024305212		Date Opened: 11/14/2024							
Description: Perry, Victor Lynn, M.D. (Acc)(6412)									
Professional Type: Analyst									
Fiscal Year: 2025									
Professional: Phillip E. Deters									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
605742126	8/12/25	CV-HQE:160	03573	Cost Recovery	0.25	\$202.00	\$50.50		8/31/25
Phillip E. Deters Totals:					0.25		\$50.50		
2025 Totals:					0.25		\$50.50		
Analyst Totals:					0.25		\$50.50		

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Matter ID: FR2024305212									
Description: Perry, Victor Lynn, M.D. (Acc)(6412)									
Date Opened: 11/14/2024									
Professional Type: Attorney									
Fiscal Year: 2025									
Professional: Sarah J. Jacobs									
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj.?	Statement Date
950401164	7/3/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		7/31/25
950401171	7/3/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		7/31/25
950407217	7/28/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		7/31/25
950407218	7/28/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		7/31/25
950407303	7/28/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		7/31/25
950407759	7/29/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		7/31/25
950407762	7/29/25	CV-HQE:160	03573	Contract/Document Preparation	0.50	\$228.00	\$114.00		7/31/25
950408572	7/31/25	CV-HQE:160	03573	Witness-Related Preparation	0.50	\$228.00	\$114.00		7/31/25
950408647	7/31/25	CV-HQE:160	03573	Document Analysis	0.50	\$228.00	\$114.00		7/31/25
950408657	7/31/25	CV-HQE:160	03573	Witness-Related Preparation	0.50	\$228.00	\$114.00		7/31/25
950409573	8/4/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		8/31/25
950409593	8/4/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		8/31/25
950410214	8/6/25	CV-HQE:160	03573	Witness-Related Preparation	0.50	\$228.00	\$114.00		8/31/25
950411144	8/11/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		8/31/25
950411176	8/11/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		8/31/25
950411177	8/11/25	CV-HQE:160	03573	Document Analysis	1.00	\$228.00	\$228.00		8/31/25
950411209	8/12/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		8/31/25
950411210	8/12/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		8/31/25
950411270	8/12/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	0.25	\$228.00	\$57.00		8/31/25
950411271	8/12/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	0.50	\$228.00	\$114.00		8/31/25
950411268	8/14/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	0.25	\$228.00	\$57.00		8/31/25
950411269	8/14/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		8/31/25
950412404	8/15/25	CV-HQE:160	03573	Document Analysis	0.75	\$228.00	\$171.00		8/31/25
950412956	8/18/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	0.25	\$228.00	\$57.00		8/31/25
950412957	8/18/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	0.25	\$228.00	\$57.00		8/31/25

Nov 12, 2025 11:32:19 AM

2 of 17

(SCVHQE016)

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950412958	8/18/25	CV-HQE:160	03573	Document Analysis	0.50	\$228.00	\$114.00		8/31/25
950412959	8/19/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		8/31/25
950412960	8/19/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	0.25	\$228.00	\$57.00		8/31/25
950412963	8/19/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		8/31/25
950413212	8/19/25	CV-HQE:160	03573	Analysis/Strategy	0.50	\$228.00	\$114.00		8/31/25
950413213	8/19/25	CV-HQE:160	03573	Witness-Related Preparation	0.50	\$228.00	\$114.00		8/31/25
950413486	8/20/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		8/31/25
950413499	8/20/25	CV-HQE:160	03573	Document Analysis	0.50	\$228.00	\$114.00		8/31/25
950413513	8/20/25	CV-HQE:160	03573	Document Analysis	0.75	\$228.00	\$171.00		8/31/25
950414664	8/25/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		8/31/25
950414666	8/25/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		8/31/25
950415161	8/26/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		8/31/25
950415164	8/26/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		8/31/25
950415379	8/27/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		8/31/25
950415380	8/27/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		8/31/25
950415513	8/27/25	CV-HQE:160	03573	Document Analysis	1.00	\$228.00	\$228.00		8/31/25
950417609	9/3/25	CV-HQE:160	03573	Witness-Related Preparation	0.50	\$228.00	\$114.00		9/30/25
950418942	9/10/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		9/30/25
950418943	9/10/25	CV-HQE:160	03573	Contract/Document Preparation	0.50	\$228.00	\$114.00		9/30/25
950419387	9/12/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		9/30/25
950419487	9/12/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		9/30/25
950424810	10/1/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		10/31/25
950424811	10/1/25	CV-HQE:160	03573	Other Submission/Motion/Appeal	0.25	\$228.00	\$57.00		10/31/25
950424812	10/1/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		10/31/25
950425687	10/6/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		10/31/25
950425720	10/6/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		10/31/25
950426179	10/7/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		10/31/25
950426201	10/7/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		10/31/25
950426270	10/8/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		10/31/25
950426271	10/8/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		10/31/25

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950426744	10/9/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		10/31/25
950426756	10/9/25	CV-HQE:160	03573	Communication with Other Party	0.50	\$228.00	\$114.00		10/31/25
950426757	10/9/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		10/31/25
950427950	10/16/25	CV-HQE:160	03573	Analysis/Strategy	0.50	\$228.00	\$114.00		10/31/25
950427951	10/16/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		10/31/25
950428202	10/16/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		10/31/25
950428203	10/16/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		10/31/25
950428751	10/17/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		10/31/25
950428752	10/17/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		10/31/25
950428753	10/17/25	CV-HQE:160	03573	Prehearing Conference	0.25	\$228.00	\$57.00		10/31/25
950428754	10/17/25	CV-HQE:160	03573	Settlement Conference	0.25	\$228.00	\$57.00		10/31/25
950428802	10/17/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		10/31/25
950429410	10/21/25	CV-HQE:160	03573	Communication with Other Party	0.50	\$228.00	\$114.00		10/31/25
950429896	10/22/25	CV-HQE:160	03573	Evidentiary Preparation - Other	0.50	\$228.00	\$114.00		10/31/25
950429897	10/22/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		10/31/25
950430176	10/23/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		10/31/25
950430309	10/23/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		10/31/25
950430574	10/24/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		10/31/25
950430579	10/24/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		10/31/25
950431509	10/28/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		10/31/25
950431623	10/29/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		10/31/25
950431995	10/29/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		10/31/25
950432002	10/29/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		10/31/25
950433809	11/3/25	CV-HQE:160	03573	Trial Preparation	0.25	\$228.00	\$57.00		
950433814	11/3/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		
950433815	11/3/25	CV-HQE:160	03573	Analysis/Strategy	0.75	\$228.00	\$171.00		
950434307	11/4/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		
950434308	11/4/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		
950434323	11/4/25	CV-HQE:160	03573	Witness-Related Preparation	0.50	\$228.00	\$114.00		
950434328	11/4/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950434397	11/5/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		
950434641	11/5/25	CV-HQE:160	03573	Evidentiary Preparation - Other	0.25	\$228.00	\$57.00		
950434662	11/5/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		
950434695	11/5/25	CV-HQE:160	03573	Trial Preparation	0.25	\$228.00	\$57.00		
950434636	11/6/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		
950434682	11/6/25	CV-HQE:160	03573	Trial Preparation	1.50	\$228.00	\$342.00		
950434822	11/6/25	CV-HQE:160	03573	Trial Preparation	0.75	\$228.00	\$171.00		
950434915	11/6/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		
950434916	11/6/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		
950434919	11/6/25	CV-HQE:160	03573	Document Analysis	0.50	\$228.00	\$114.00		
950434961	11/6/25	CV-HQE:160	03573	Witness-Related Preparation	0.50	\$228.00	\$114.00		
950434962	11/6/25	CV-HQE:160	03573	Trial Preparation	0.75	\$228.00	\$171.00		
950434974	11/6/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		
950435348	11/7/25	CV-HQE:160	03573	Trial Preparation	1.50	\$228.00	\$342.00		
950435349	11/7/25	CV-HQE:160	03573	Evidentiary Preparation - Other	0.75	\$228.00	\$171.00		
950435350	11/7/25	CV-HQE:160	03573	Trial Preparation	0.75	\$228.00	\$171.00		
Sarah J. Jacobs Totals:					40.50		\$9,234.00		
Professional: Steve Diehl									
950403863	7/7/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		7/31/25
950409412	7/31/25	CV-HQE:160	03573	Supervisory Review	0.50	\$228.00	\$114.00		7/31/25
950409602	8/4/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		8/31/25
950411174	8/11/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		8/31/25
950412092	8/12/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		8/31/25
950412498	8/15/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		8/31/25
950415992	8/18/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		8/31/25
950415157	8/25/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		8/31/25
950420531	9/12/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		9/30/25
950425364	10/2/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		10/31/25
950426309	10/7/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		10/31/25
950426750	10/9/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		10/31/25

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950430496	10/15/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		10/31/25
950430497	10/24/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		10/31/25
950432134	10/27/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		10/31/25
950433885	11/3/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		10/31/25
950434891	11/5/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		10/31/25
950434993	11/6/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		
Steve Diehl Totals:					4.75		\$1,083.00		
2025 Totals:					45.25		\$10,317.00		
Fiscal Year: 2024									
Professional: Jade Wolansky									
307607981	5/8/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		5/31/25
307607982	5/9/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		5/31/25
Jade Wolansky Totals:					0.50		\$114.00		
Professional: Michael C. Brummel									
307564851	4/29/25	CV-HQE:160	03573	Analysis/Strategy	0.50	\$228.00	\$114.00		4/30/25
Michael C. Brummel Totals:					0.50		\$114.00		
Professional: Sarah J. Jacobs									
950370908	11/14/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.50	\$228.00	\$114.00		11/30/24
950371012	11/15/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.75	\$228.00	\$171.00		11/30/24
950371013	11/15/24	CV-HQE:160	03573	Case Evaluation/Assessment	1.00	\$228.00	\$228.00		11/30/24
950371029	11/15/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.75	\$228.00	\$171.00		11/30/24
950371031	11/15/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		11/30/24
950371067	11/15/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.75	\$228.00	\$171.00		11/30/24
950371069	11/15/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.75	\$228.00	\$171.00		11/30/24
950371089	11/15/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		11/30/24
950371111	11/15/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.75	\$228.00	\$171.00		11/30/24
950371289	11/18/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.75	\$228.00	\$171.00		11/30/24
950371290	11/18/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.50	\$228.00	\$114.00		11/30/24
950371409	11/19/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		11/30/24
950371457	11/19/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		11/30/24

Nov 12, 2025 11:32:19 AM

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950371641	11/22/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		11/30/24
950372240	11/26/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		11/30/24
950372834	12/3/24	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		12/31/24
950372854	12/4/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950372860	12/4/24	CV-HQE:160	03573	Document Analysis	0.75	\$228.00	\$171.00		12/31/24
950372863	12/4/24	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		12/31/24
950372864	12/4/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		12/31/24
950372946	12/5/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950372947	12/5/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950373085	12/6/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		12/31/24
950373191	12/6/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950373193	12/6/24	CV-HQE:160	03573	Investigation	0.50	\$228.00	\$114.00		12/31/24
950373415	12/10/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950373417	12/10/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950373529	12/11/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950373530	12/11/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950373535	12/11/24	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		12/31/24
950373651	12/12/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950373656	12/12/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950373707	12/13/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950373717	12/13/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374259	12/16/24	CV-HQE:160	03573	Investigation	0.50	\$228.00	\$114.00		12/31/24
950374154	12/17/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374160	12/17/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374161	12/17/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374210	12/17/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374211	12/17/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374258	12/17/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374344	12/18/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374374	12/19/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj.?	Statement Date
950374375	12/19/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374377	12/19/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374379	12/19/24	CV-HQE:160	03573	Case Evaluation/Assessment	1.00	\$228.00	\$228.00		12/31/24
950374397	12/19/24	CV-HQE:160	03573	Investigation	1.00	\$228.00	\$228.00		12/31/24
950374449	12/19/24	CV-HQE:160	03573	Investigation	1.00	\$228.00	\$228.00		12/31/24
950374563	12/20/24	CV-HQE:160	03573	Document Analysis	1.00	\$228.00	\$228.00		12/31/24
950374564	12/20/24	CV-HQE:160	03573	Investigation	3.50	\$228.00	\$798.00		12/31/24
950374730	12/23/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950374733	12/23/24	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		12/31/24
950374736	12/23/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		12/31/24
950375295	12/30/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		12/31/24
950375333	12/30/24	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		12/31/24
950375536	12/30/24	CV-HQE:160	03573	Pleading Preparation	2.50	\$228.00	\$570.00		12/31/24
950375537	12/30/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950375543	12/30/24	CV-HQE:160	03573	Pleading Preparation	0.50	\$228.00	\$114.00		12/31/24
950375544	12/30/24	CV-HQE:160	03573	Research	0.50	\$228.00	\$114.00		12/31/24
950375545	12/30/24	CV-HQE:160	03573	Pleading Preparation	1.50	\$228.00	\$342.00		12/31/24
950375626	12/31/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950375629	12/31/24	CV-HQE:160	03573	Pleading Preparation	1.50	\$228.00	\$342.00		12/31/24
950375638	12/31/24	CV-HQE:160	03573	Research	0.25	\$228.00	\$57.00		12/31/24
950375640	12/31/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950375642	12/31/24	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		12/31/24
950375720	1/2/25	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		1/31/25
950375722	1/2/25	CV-HQE:160	03573	Pleading Preparation	0.25	\$228.00	\$57.00		1/31/25
950375732	1/2/25	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		1/31/25
950375739	1/2/25	CV-HQE:160	03573	Pleading Preparation	2.00	\$228.00	\$456.00		1/31/25
950375746	1/2/25	CV-HQE:160	03573	Pleading Preparation	0.25	\$228.00	\$57.00		1/31/25
950375762	1/2/25	CV-HQE:160	03573	Pleading Preparation	1.00	\$228.00	\$228.00		1/31/25
950375765	1/2/25	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		1/31/25
950375818	1/2/25	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		1/31/25

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj?	Statement Date
950375819	1/2/25	CV-HQE:160	03573	Case Evaluation/Assessment	0.25	\$228.00	\$57.00		1/31/25
950376254	1/9/25	CV-HQE:160	03573	Pleading Preparation	0.25	\$228.00	\$57.00		1/31/25
950376255	1/9/25	CV-HQE:160	03573	Pleading Preparation	0.25	\$228.00	\$57.00		1/31/25
950376256	1/9/25	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		1/31/25
950376257	1/9/25	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		1/31/25
950376258	1/9/25	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		1/31/25
950377081	1/16/25	CV-HQE:160	03573	Pleading Preparation	0.25	\$228.00	\$57.00		1/31/25
950377094	1/16/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		1/31/25
950377095	1/16/25	CV-HQE:160	03573	Pleading Preparation	0.25	\$228.00	\$57.00		1/31/25
950377096	1/16/25	CV-HQE:160	03573	Pleading Preparation	0.25	\$228.00	\$57.00		1/31/25
950377097	1/16/25	CV-HQE:160	03573	Pleading Preparation	0.25	\$228.00	\$57.00		1/31/25
950377099	1/16/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		1/31/25
950377160	1/17/25	CV-HQE:160	03573	Investigation	0.25	\$228.00	\$57.00		1/31/25
950377674	1/23/25	CV-HQE:160	03573	Research	0.25	\$228.00	\$57.00		1/31/25
950377733	1/24/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		1/31/25
950377738	1/24/25	CV-HQE:160	03573	Pleading Preparation	0.50	\$228.00	\$114.00		1/31/25
950377739	1/24/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		1/31/25
950378021	1/27/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		1/31/25
950378078	1/27/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		1/31/25
950378080	1/27/25	CV-HQE:160	03573	Research	0.25	\$228.00	\$57.00		1/31/25
950379901	2/11/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		2/28/25
950379958	2/11/25	CV-HQE:160	03573	Research	0.25	\$228.00	\$57.00		2/28/25
950380251	2/14/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		2/28/25
950380252	2/14/25	CV-HQE:160	03573	Analysis/Strategy	0.50	\$228.00	\$114.00		2/28/25
950380434	2/18/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		2/28/25
950380435	2/18/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		2/28/25
950380437	2/18/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		2/28/25
950380438	2/18/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		2/28/25
950380439	2/18/25	CV-HQE:160	03573	Discovery	0.25	\$228.00	\$57.00		2/28/25
950381372	2/26/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		2/28/25

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950381373	2/26/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		2/28/25
950381642	2/27/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		2/28/25
950381644	2/27/25	CV-HQE:160	03573	Discovery	0.25	\$228.00	\$57.00		2/28/25
950381645	2/27/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		2/28/25
403452403	3/5/25	CV-HQE:160	03573	Discovery	0.25	\$228.00	\$57.00		3/31/25
403452422	3/5/25	CV-HQE:160	03573	Discovery	0.25	\$228.00	\$57.00		3/31/25
950382535	3/7/25	CV-HQE:160	03573	Discovery	0.25	\$228.00	\$57.00		3/31/25
950382562	3/7/25	CV-HQE:160	03573	Discovery	0.25	\$228.00	\$57.00		3/31/25
950382564	3/7/25	CV-HQE:160	03573	Discovery	0.25	\$228.00	\$57.00		3/31/25
950382812	3/11/25	CV-HQE:160	03573	Discovery	0.25	\$228.00	\$57.00		3/31/25
950382825	3/11/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		3/31/25
950382826	3/11/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		3/31/25
950382828	3/11/25	CV-HQE:160	03573	Communication with Other Party	0.50	\$228.00	\$114.00		3/31/25
950382856	3/11/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		3/31/25
950382859	3/11/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		3/31/25
950382860	3/12/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		3/31/25
950382901	3/12/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		3/31/25
950382997	3/12/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		3/31/25
950383007	3/12/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	1.25	\$228.00	\$285.00		3/31/25
950383165	3/14/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		3/31/25
950383178	3/14/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		3/31/25
950383465	3/17/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		3/31/25
950383566	3/18/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	0.50	\$228.00	\$114.00		3/31/25
950383702	3/18/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	1.00	\$228.00	\$228.00		3/31/25
950383704	3/18/25	CV-HQE:160	03573	Document Analysis	0.50	\$228.00	\$114.00		3/31/25
950383710	3/18/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		3/31/25
950383713	3/18/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		3/31/25
950383540	3/20/25	CV-HQE:160	03573	Document Analysis	0.50	\$228.00	\$114.00		3/31/25
950384330	3/24/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		3/31/25
950384333	3/24/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		3/31/25

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950384334	3/24/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		3/31/25
950384336	3/24/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		3/31/25
950384360	3/24/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		3/31/25
950384490	3/26/25	CV-HQE:160	03573	Analysis/Strategy	0.50	\$228.00	\$114.00		3/31/25
950385499	4/2/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		4/30/25
950385500	4/2/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		4/30/25
950385501	4/2/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		4/30/25
950385534	4/2/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		4/30/25
950385535	4/2/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		4/30/25
950385536	4/2/25	CV-HQE:160	03573	Other Submission/Motion/Appealance	0.50	\$228.00	\$114.00		4/30/25
950385540	4/2/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		4/30/25
950385545	4/2/25	CV-HQE:160	03573	Communication with Other Party	0.75	\$228.00	\$171.00		4/30/25
950385547	4/2/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		4/30/25
950385566	4/3/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		4/30/25
950385567	4/3/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		4/30/25
950385568	4/3/25	CV-HQE:160	03573	Communication with Other Party	0.50	\$228.00	\$114.00		4/30/25
950385670	4/4/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		4/30/25
950385671	4/4/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		4/30/25
950385833	4/7/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		4/30/25
950385837	4/7/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		4/30/25
950385840	4/7/25	CV-HQE:160	03573	Other Submission/Motion/Appealance	0.25	\$228.00	\$57.00		4/30/25
950385956	4/8/25	CV-HQE:160	03573	Other Submission/Motion/Appealance	0.25	\$228.00	\$57.00		4/30/25
950385957	4/8/25	CV-HQE:160	03573	Contract/Document Preparation	1.00	\$228.00	\$228.00		4/30/25
950385958	4/8/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		4/30/25
950385959	4/8/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		4/30/25
950385960	4/8/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		4/30/25
950385961	4/8/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		4/30/25
950385965	4/8/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		4/30/25
950386349	4/14/25	CV-HQE:160	03573	Other Submission/Motion/Appealance	0.25	\$228.00	\$57.00		4/30/25
950386350	4/15/25	CV-HQE:160	03573	Other Submission/Motion/Appealance	0.25	\$228.00	\$57.00		4/30/25

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950386748	4/16/25	CV-HQE:160	03573	Other Submission/Motion/Appearence	0.25	\$228.00	\$57.00		4/30/25
950386796	4/17/25	CV-HQE:160	03573	Other Submission/Motion/Appearence	0.50	\$228.00	\$114.00		4/30/25
950386797	4/17/25	CV-HQE:160	03573	Contract/Document Preparation	0.50	\$228.00	\$114.00		4/30/25
950386798	4/17/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		4/30/25
950387071	4/23/25	CV-HQE:160	03573	Other Submission/Motion/Appearence	0.25	\$228.00	\$57.00		4/30/25
950387072	4/23/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		4/30/25
950387073	4/23/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		4/30/25
950387366	4/24/25	CV-HQE:160	03573	Witness-Related Preparation	0.75	\$228.00	\$171.00		4/30/25
950387375	4/24/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		4/30/25
950387376	4/24/25	CV-HQE:160	03573	Document Analysis	0.75	\$228.00	\$171.00		4/30/25
950387381	4/24/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		4/30/25
950387074	4/25/25	CV-HQE:160	03573	Document Analysis	0.75	\$228.00	\$171.00		4/30/25
950387813	4/28/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	0.75	\$228.00	\$171.00		4/30/25
950387818	4/28/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		4/30/25
950387829	4/28/25	CV-HQE:160	03573	Document Analysis	0.75	\$228.00	\$171.00		4/30/25
950387836	4/28/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		4/30/25
950387839	4/28/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		4/30/25
950387840	4/28/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		4/30/25
950387927	4/29/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		4/30/25
950387928	4/29/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		4/30/25
950387930	4/29/25	CV-HQE:160	03573	Research	1.00	\$228.00	\$228.00		4/30/25
950387976	4/29/25	CV-HQE:160	03573	Analysis/Strategy	0.50	\$228.00	\$114.00		4/30/25
950387977	4/29/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		4/30/25
950387978	4/29/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		4/30/25
950387982	4/29/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		4/30/25
950387983	4/29/25	CV-HQE:160	03573	Document Analysis	0.50	\$228.00	\$114.00		4/30/25
950387985	4/29/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		4/30/25
950388004	4/29/25	CV-HQE:160	03573	Settlement Preparation/Negotiation	1.00	\$228.00	\$228.00		4/30/25
950388006	4/29/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		4/30/25
950388009	4/29/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		4/30/25

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950388007	4/30/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		4/30/25
950388008	4/30/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		4/30/25
950388341	5/1/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		5/31/25
950388345	5/1/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		5/31/25
950388445	5/1/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		5/31/25
950388451	5/1/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		5/31/25
950388879	5/6/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950388881	5/6/25	CV-HQE:160	03573	Contract/Document Preparation	0.25	\$228.00	\$57.00		5/31/25
950388882	5/6/25	CV-HQE:160	03573	Communication with Other Party	0.25	\$228.00	\$57.00		5/31/25
950388969	5/7/25	CV-HQE:160	03573	Other Submission/Motion/Appeal	1.00	\$228.00	\$228.00		5/31/25
950389000	5/7/25	CV-HQE:160	03573	Other Submission/Motion/Appeal	0.25	\$228.00	\$57.00		5/31/25
950389001	5/7/25	CV-HQE:160	03573	Document Analysis	0.50	\$228.00	\$114.00		5/31/25
950389002	5/7/25	CV-HQE:160	03573	Other Submission/Motion/Appeal	0.25	\$228.00	\$57.00		5/31/25
950389003	5/7/25	CV-HQE:160	03573	Other Submission/Motion/Appeal	0.25	\$228.00	\$57.00		5/31/25
950389125	5/9/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		5/31/25
950389157	5/12/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950389158	5/12/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		5/31/25
950389159	5/12/25	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		5/31/25
950389188	5/12/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950389319	5/12/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950389321	5/12/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950389323	5/12/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950389329	5/12/25	CV-HQE:160	03573	Document Analysis	0.25	\$228.00	\$57.00		5/31/25
950389632	5/15/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950390852	5/27/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950390858	5/27/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950390995	5/27/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950390996	5/27/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25
950390997	5/27/25	CV-HQE:160	03573	Analysis/Strategy	0.25	\$228.00	\$57.00		5/31/25
950391239	5/28/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		5/31/25

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950392675	6/2/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		6/30/25
950393322	6/3/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		6/30/25
950393323	6/3/25	CV-HQE:160	03573	Witness-Related Preparation	0.50	\$228.00	\$114.00		6/30/25
950393380	6/4/25	CV-HQE:160	03573	Witness-Related Preparation	0.75	\$228.00	\$171.00		6/30/25
950393386	6/4/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		6/30/25
950393389	6/6/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		6/30/25
950394075	6/6/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		6/30/25
950394087	6/6/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		6/30/25
950399177	6/26/25	CV-HQE:160	03573	Witness-Related Preparation	0.25	\$228.00	\$57.00		6/30/25
950399905	6/27/25	CV-HQE:160	03573	Contract/Document Preparation	0.75	\$228.00	\$171.00		6/30/25
Sarah J. Jacobs Totals:					91.50		\$20,862.00		
Professional: Steve Diehl									
950370906	11/14/24	CV-HQE:160	03573	Transmittal Receipt/Initial Review	0.25	\$228.00	\$57.00		11/30/24
950370907	11/14/24	CV-HQE:160	03573	SDAG Review	0.75	\$228.00	\$171.00		11/30/24
950371204	11/15/24	CV-HQE:160	03573	SDAG Review	0.50	\$228.00	\$114.00		11/30/24
950372271	11/26/24	CV-HQE:160	03573	SDAG Review	1.75	\$228.00	\$399.00		11/30/24
950372273	11/26/24	CV-HQE:160	03573	Prepare Return for More INV Letter	0.75	\$228.00	\$171.00		11/30/24
950372835	12/2/24	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		12/31/24
950372836	12/3/24	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		12/31/24
950372872	12/4/24	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		12/31/24
950373138	12/6/24	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		12/31/24
950373666	12/12/24	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		12/31/24
950373736	12/13/24	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		12/31/24
950374213	12/17/24	CV-HQE:160	03573	SDAG Review	0.25	\$228.00	\$57.00		12/31/24
950374565	12/20/24	CV-HQE:160	03573	SDAG Review	0.25	\$228.00	\$57.00		12/31/24
950375299	12/30/24	CV-HQE:160	03573	Client Communication	0.25	\$228.00	\$57.00		12/31/24
950376970	1/16/25	CV-HQE:160	03573	Supervisory Review	0.50	\$228.00	\$114.00		1/31/25
950378545	1/27/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		1/31/25
950379440	2/3/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		2/28/25
950382369	3/5/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		3/31/25

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date
950382898	3/11/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		3/31/25
950385718	4/2/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		4/30/25
950385758	4/4/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		4/30/25
950387910	4/28/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		4/30/25
950387984	4/29/25	CV-HQE:160	03573	Supervisory Review	0.50	\$228.00	\$114.00		4/30/25
950388256	4/30/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		4/30/25
950388448	5/1/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		5/31/25
950389240	5/9/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		5/31/25
950392590	5/28/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		5/31/25
950392595	5/30/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		5/31/25
950393339	6/3/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		6/30/25
950394078	6/6/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		6/30/25
950394746	6/9/25	CV-HQE:160	03573	Supervisory Review	0.25	\$228.00	\$57.00		6/30/25
Steve Diehl Totals:					11.00		\$2,508.00		
2024 Totals:					103.50		\$23,598.00		
Attorney Totals:					148.75		\$33,915.00		

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Matter ID: FR2024305212										
Description: Perry, Victor Lynn, M.D. (Acc)(6412)										
Date Opened: 11/14/2024										
Professional Type: Paralegal										
Fiscal Year: 2025										
Professional: Carolyn Yohn										
Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj ?	Statement Date	
307740340	7/23/25	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		7/31/25	
307912112	10/17/25	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		10/31/25	
307954992	11/6/25	CV-HQE:160	03573	Trial Preparation	2.75	\$213.00	\$585.75			
307955928	11/7/25	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25			
Carolyn Yohn Totals:					3.50		\$745.50			
2025 Totals:					3.50		\$745.50			
Fiscal Year: 2024										
Professional: Carolyn Yohn										
307198439	11/14/24	CV-HQE:160	03573	Surface Review	1.25	\$213.00	\$266.25		11/30/24	
307198586	11/14/24	CV-HQE:160	03573	Case Management	0.75	\$213.00	\$159.75		11/30/24	
307228589	11/27/24	CV-HQE:160	03573	File Closing	0.25	\$213.00	\$53.25		11/30/24	
307228592	11/27/24	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		11/30/24	
307239310	12/3/24	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		12/31/24	
307271193	12/18/24	CV-HQE:160	03573	Case Management	0.50	\$213.00	\$106.50		12/31/24	
307284326	12/23/24	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		12/31/24	
307288322	12/26/24	CV-HQE:160	03573	Discovery	1.00	\$213.00	\$213.00		12/31/24	
307300811	1/2/25	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		1/31/25	
307312778	1/9/25	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		1/31/25	
307371957	2/3/25	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		2/28/25	
307425917	2/27/25	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		2/28/25	
307435926	3/3/25	CV-HQE:160	03573	Discovery	1.25	\$213.00	\$266.25		3/31/25	
307444672	3/6/25	CV-HQE:160	03573	Discovery	1.50	\$213.00	\$319.50		3/31/25	
307452478	3/10/25	CV-HQE:160	03573	Discovery	0.25	\$213.00	\$53.25		3/31/25	
307518881	4/9/25	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		4/30/25	
307522450	4/10/25	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		4/30/25	

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE
1300 I STREET, SACRAMENTO, CA 95814
Billing Inquiries: (916) 210-7048



Matter Time Activity By Professional Type

As of Nov 12, 2025

Trans #	Date	Section	Client	Task	Hours Worked	Rate	Amount	Adj?	Statement Date
307528878	4/14/25	CV-HQE:160	03573	Case Management	0.25	\$213.00	\$53.25		4/30/25
Carolyn Yohn Totals:					9.25		\$1,970.25		
Professional: Monica Loera									
307451015	3/3/25	CV-HQE:160	03573	Case Management	0.50	\$213.00	\$106.50		3/31/25
307527287	4/3/25	CV-HQE:160	03573	Case Management	0.50	\$213.00	\$106.50		4/30/25
Monica Loera Totals:					1.00		\$213.00		
2024 Totals:					10.25		\$2,183.25		
Paralegal Totals:					13.75		\$2,928.75		
FR2024305212 Totals:					162.75		\$36,894.25		

DEPARTMENT OF CONSUMER AFFAIRS
 DIVISION OF INVESTIGATION
 HEALTH QUALITY INVESTIGATION UNIT (HQIU)
DECLARATION OF INVESTIGATIVE ACTIVITY

CLIENT AGENCY: Medical Board of California

In the Matter of the Investigation of: VICTOR PERRY

Professional License/Certification Number: G86263

Case Number: 8002022086412

I, VEVERKA, MICHEL, hereby declare and certify as follows:

I am employed by the Department of Consumer Affairs (DCA). I have been designated as the representative to certify the costs of investigation by the DCA and allocated to the Medical Board of California in this case. I make this certification in my official capacity and as a public employee pursuant to Evidence Code section 664.

The following list of investigators were assigned to the investigation of this case, which was initially opened by the DCA on or about 02/17/2022.

- RODRIGUEZ, KAYLA
- PREIS, JEREMY
- SERNETT, REBECCA
- LEYVA, GINA

I am familiar with the time reporting system of the DCA for the reasonable and necessary work performed on a particular case. It is the duty of the time keeping employees to keep track of the time spent and to report that time in the Department's computerized system at or near the time of the tasks performed.

The activity summary entitled "Investigator Log" was obtained from DCA's computerized system, which includes the detail of tasks performed by investigators as maintained in the DCA's system. I hereby certify that the Investigator Log, attached hereto as Exhibit A, and herein incorporated by reference, is a true and correct copy of the activity summary for this matter. The summary is comprehensive of the time spent by the DCA through 12/17/2024. It does not include tasks performed after 12/17/2024.

To the best of my knowledge the items set forth in this certification are correct and were necessarily incurred in this case. The total hours of investigative activity and rates applicable to the above entitled case are as follows:

FISCAL YEAR	TITLE	NUMBER OF HOURS	HOURLY RATE	FY TOTAL RATE
2024/2025	Investigator	71.75	173	\$12,412.75
2023/2024	Investigator	11.00	170	\$1,870.00
	Investigator *	2.00	173	\$346.00
2022/2023	Investigator	21.75	158	\$3,436.50
	Investigator *	20.75	170	\$3,527.50
2021/2022	Investigator	6.25	158	\$987.50
Overall - Total		133.50		\$22,580.25

	Investigative Hours	Supplemental Hours
2024/2025	71.75	
2023/2024	13.00	
2022/2023	42.50	
2021/2022	6.25	
Total	133.50	

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and

* FY 23/24 Updated Investigator billing rate effective as of 12/21/2023.
 * FY 22/23 Updated Investigator billing rate effective as of 12/14/2022.

DEPARTMENT OF CONSUMER AFFAIRS
DIVISION OF INVESTIGATION
HEALTH QUALITY INVESTIGATION UNIT (HQIU)
DECLARATION OF INVESTIGATIVE ACTIVITY

correct.

Executed on December 17, 2024 at Sacramento, California.

Michel Veverka
Signature VEVERKA, MICHEL

Supervising Investigator
Title

* FY 23/24 Updated Investigator billing rate effective as of 12/21/2023.
* FY 22/23 Updated Investigator billing rate effective as of 12/14/2022.

Investigator Log

Date	Hours Spent	Worked By	Task Code	Task Description
04/13/2022	0.50	SERNETT, REBECCA	COMM	Communication
04/13/2022	1.00	SERNETT, REBECCA	EVID	Evidence
04/13/2022	1.50	SERNETT, REBECCA	RESB	Report/Subpoena Writing
04/14/2022	0.25	SERNETT, REBECCA	RESB	Report/Subpoena Writing
04/14/2022	1.00	SERNETT, REBECCA	RESB	Report/Subpoena Writing
04/14/2022	1.00	SERNETT, REBECCA	RESB	Report/Subpoena Writing
04/21/2022	0.50	SERNETT, REBECCA	EVID	Evidence
04/21/2022	0.50	SERNETT, REBECCA	RESB	Report/Subpoena Writing
10/18/2022	0.50	SERNETT, REBECCA	RESB	Report/Subpoena Writing
10/18/2022	0.50	SERNETT, REBECCA	RREV	Records/Document Review
10/18/2022	1.00	SERNETT, REBECCA	DMAI	Documents/Mailing
10/19/2022	0.25	SERNETT, REBECCA	COMM	Communication
10/19/2022	0.25	SERNETT, REBECCA	COMM	Communication
10/19/2022	0.50	SERNETT, REBECCA	DBRE	Database Research/Entry
10/19/2022	0.75	SERNETT, REBECCA	RESB	Report/Subpoena Writing
10/19/2022	0.75	SERNETT, REBECCA	RREV	Records/Document Review
10/20/2022	0.25	SERNETT, REBECCA	COMM	Communication
10/20/2022	0.50	SERNETT, REBECCA	COMM	Communication
11/09/2022	0.50	SERNETT, REBECCA	COMM	Communication
11/16/2022	0.25	SERNETT, REBECCA	COMM	Communication
11/16/2022	1.25	SERNETT, REBECCA	EVID	Evidence
11/16/2022	1.75	SERNETT, REBECCA	INTR	Interview
11/18/2022	0.25	SERNETT, REBECCA	RESB	Report/Subpoena Writing
11/29/2022	3.50	SERNETT, REBECCA	RESB	Report/Subpoena Writing
11/30/2022	0.50	SERNETT, REBECCA	RESB	Report/Subpoena Writing
11/30/2022	1.75	SERNETT, REBECCA	RESB	Report/Subpoena Writing
12/01/2022	0.25	SERNETT, REBECCA	INTR	Interview
12/01/2022	0.50	SERNETT, REBECCA	RESB	Report/Subpoena Writing
12/01/2022	0.50	SERNETT, REBECCA	RESB	Report/Subpoena Writing
12/01/2022	2.00	SERNETT, REBECCA	RESB	Report/Subpoena Writing
12/02/2022	1.25	SERNETT, REBECCA	RESB	Report/Subpoena Writing
12/09/2022	0.50	SERNETT, REBECCA	COMM	Communication
12/09/2022	0.50	SERNETT, REBECCA	RESB	Report/Subpoena Writing

Investigator Log

Date	Hours Spent	Worked By	Task Code	Task Description
12/09/2022	1.00	SERNETT, REBECCA	DMAI	Documents/Mailing
12/12/2022	0.25	SERNETT, REBECCA	DMAI	Documents/Mailing
12/22/2022	0.50	SERNETT, REBECCA	RESB	Report/Subpoena Writing
12/22/2022	0.75	SERNETT, REBECCA	EVID	Evidence
12/27/2022	0.50	SERNETT, REBECCA	EVID	Evidence
12/27/2022	0.50	SERNETT, REBECCA	RESB	Report/Subpoena Writing
12/28/2022	1.00	SERNETT, REBECCA	EVID	Evidence
12/28/2022	1.00	SERNETT, REBECCA	RESB	Report/Subpoena Writing
12/29/2022	0.25	SERNETT, REBECCA	EVID	Evidence
12/29/2022	0.25	SERNETT, REBECCA	RESB	Report/Subpoena Writing
12/29/2022	1.25	SERNETT, REBECCA	COMM	Communication
01/04/2023	1.00	SERNETT, REBECCA	COMM	Communication
01/04/2023	1.00	SERNETT, REBECCA	EVID	Evidence
01/04/2023	1.25	SERNETT, REBECCA	RESB	Report/Subpoena Writing
01/06/2023	0.50	SERNETT, REBECCA	COMM	Communication
01/06/2023	2.00	RODRIGUEZ, KAYLA	RREV	Records/Document Review
01/12/2023	1.00	RODRIGUEZ, KAYLA	COMM	Communication
02/28/2023	0.50	RODRIGUEZ, KAYLA	COMM	Communication
03/14/2023	1.00	RODRIGUEZ, KAYLA	COMM	Communication
03/24/2023	0.50	RODRIGUEZ, KAYLA	COMM	Communication
03/28/2023	0.50	RODRIGUEZ, KAYLA	COMM	Communication
04/03/2023	1.50	RODRIGUEZ, KAYLA	DMAI	Documents/Mailing
04/04/2023	2.00	RODRIGUEZ, KAYLA	DMAI	Documents/Mailing
04/05/2023	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
04/06/2023	1.00	RODRIGUEZ, KAYLA	COMM	Communication
07/05/2023	1.00	RODRIGUEZ, KAYLA	COMM	Communication
07/05/2023	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
08/08/2023	1.00	RODRIGUEZ, KAYLA	DMAI	Documents/Mailing
09/22/2023	2.00	RODRIGUEZ, KAYLA	COMM	Communication
09/27/2023	1.00	RODRIGUEZ, KAYLA	COMM	Communication
10/23/2023	1.00	RODRIGUEZ, KAYLA	COMM	Communication
12/07/2023	4.00	RODRIGUEZ, KAYLA	COMM	Communication
05/23/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication

Investigator Log

Date	Hours Spent	Worked By	Task Code	Task Description
05/31/2024	0.50	RODRIGUEZ, KAYLA	COMM	Communication
06/12/2024	0.50	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
07/01/2024	1.00	RODRIGUEZ, KAYLA	DMAI	Documents/Mailing
07/02/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
07/08/2024	0.50	RODRIGUEZ, KAYLA	RREV	Records/Document Review
07/17/2024	0.50	RODRIGUEZ, KAYLA	RREV	Records/Document Review
07/29/2024	0.50	RODRIGUEZ, KAYLA	RREV	Records/Document Review
08/02/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
08/12/2024	1.00	RODRIGUEZ, KAYLA	RREV	Records/Document Review
08/20/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
08/20/2024	1.00	RODRIGUEZ, KAYLA	DMAI	Documents/Mailing
08/21/2024	0.50	RODRIGUEZ, KAYLA	COMM	Communication
08/21/2024	0.50	RODRIGUEZ, KAYLA	DMAI	Documents/Mailing
08/22/2024	0.50	RODRIGUEZ, KAYLA	DBRE	Database Research/Entry
08/22/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
08/22/2024	1.00	RODRIGUEZ, KAYLA	DMAI	Documents/Mailing
08/23/2024	0.50	RODRIGUEZ, KAYLA	RREV	Records/Document Review
08/26/2024	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
08/28/2024	2.00	RODRIGUEZ, KAYLA	COMM	Communication
08/29/2024	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
09/06/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
09/09/2024	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
09/16/2024	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
09/17/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
09/26/2024	0.50	RODRIGUEZ, KAYLA	COMM	Communication
09/26/2024	0.50	RODRIGUEZ, KAYLA	COMM	Communication
09/26/2024	0.50	RODRIGUEZ, KAYLA	DMAI	Documents/Mailing
09/26/2024	0.50	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
09/26/2024	1.00	RODRIGUEZ, KAYLA	DMAI	Documents/Mailing
09/26/2024	2.00	RODRIGUEZ, KAYLA	RREV	Records/Document Review
09/27/2024	1.50	RODRIGUEZ, KAYLA	EXPR	Expert Research/ Off list
09/27/2024	1.50	RODRIGUEZ, KAYLA	EXSP	Expert Selection/Preparation
09/27/2024	2.00	RODRIGUEZ, KAYLA	EXSP	Expert Selection/Preparation

AGO-000400

Investigator Log

Date	Hours Spent	Worked By	Task Code	Task Description
09/30/2024	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
10/01/2024	0.50	RODRIGUEZ, KAYLA	COMM	Communication
10/02/2024	0.25	LEYVA, GINA	COMM	Communication
10/02/2024	0.25	LEYVA, GINA	FOPP	Field Operations
10/02/2024	0.25	LEYVA, GINA	TRAV	Travel
10/02/2024	0.50	LEYVA, GINA	TRAV	Travel
10/02/2024	1.50	RODRIGUEZ, KAYLA	COMM	Communication
10/03/2024	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
10/04/2024	0.25	PREIS, JEREMY	FOPP	Field Operations
10/04/2024	0.25	PREIS, JEREMY	TRAV	Travel
10/04/2024	0.50	PREIS, JEREMY	TRAV	Travel
10/07/2024	1.50	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
10/09/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
10/10/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
10/21/2024	1.00	RODRIGUEZ, KAYLA	DMAI	Documents/Mailing
10/21/2024	2.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
10/22/2024	2.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
10/28/2024	1.00	RODRIGUEZ, KAYLA	MISC	Miscellaneous
10/28/2024	1.00	RODRIGUEZ, KAYLA	RREV	Records/Document Review
10/29/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
10/29/2024	1.00	RODRIGUEZ, KAYLA	MISC	Miscellaneous
10/29/2024	2.50	RODRIGUEZ, KAYLA	INTR	Interview
10/30/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
11/01/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
11/01/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
11/01/2024	2.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
11/04/2024	2.00	RODRIGUEZ, KAYLA	COMM	Communication
11/05/2024	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
11/06/2024	1.00	RODRIGUEZ, KAYLA	MISC	Miscellaneous
11/12/2024	2.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
12/03/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
12/03/2024	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
12/05/2024	0.50	RODRIGUEZ, KAYLA	COMM	Communication

Investigator Log

Date	Hours Spent	Worked By	Task Code	Task Description
12/05/2024	0.50	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
12/06/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
12/10/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
12/10/2024	1.00	RODRIGUEZ, KAYLA	COMM	Communication
12/10/2024	1.00	RODRIGUEZ, KAYLA	RESB	Report/Subpoena Writing
12/11/2024	3.00	RODRIGUEZ, KAYLA	COMM	Communication

Supplemental Log

No Data Available