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

In the Matter of the First Amended Accusation Against: Afshin S. Gerayli, M.D. Physician's & Surgeon's Certificate No. G 80098 Respondent.	Case No. 800-2018-051171

DECISION

The attached Stiulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on September 12, 2022.

IT IS SO ORDERED: August 12, 2022.

MEDICAL BOARD OF CALIFORNIA

Laurie Rose Lubiano, J.D., Chair
Panel A

ROB BONTA
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
JOSEPH F. MCKENNA III
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Attorneys for Complainant

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

In the Matter of the First Amended Accusation Against: **AFSHIN S. GERAYLI, M.D.** **35 Creek Road** **Irvine, California 92604** **Physician's and Surgeon's Certificate No. G 80098,** Respondent.	Case No. 800-2018-051171 OAH No. 2021100562 **STIPULATED SETTLEMENT AND DISCIPLINARY ORDER**

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

PARTIES

1. William Prasifka (Complainant) is the Executive Director of the Medical Board of California (Board). He brought this action solely in his official capacity and is represented in this matter by Rob Bonta, Attorney General of the State of California, and by Joseph F. McKenna III, Deputy Attorney General.

2. Respondent Afshin S. Gerayli, M.D. (Respondent) is represented in this proceeding by attorney Raymond J. McMahon, Esq., whose address is: 5440 Trabuco Road, Irvine, California, 92620.

3. On or about October 26, 1994, the Medical Board issued Physician's and Surgeon's Certificate No. G 80098 to Afshin S. Gerayli, 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 September 30, 2022, unless renewed.

JURISDICTION

4. On July 28, 2021, Accusation No. 800-2018-051171 was filed before the Board. A true and correct copy of the Accusation and all other statutorily required documents were properly served on Respondent on July 28, 2021. Respondent timely filed his Notice of Defense contesting the Accusation.

5. On January 21, 2022, First Amended Accusation No. 800-2018-051171 was filed before the Board. A true and correct copy of the First Amended Accusation and all other statutorily required documents were properly served on Respondent on January 21, 2022. A true and correct copy of the First Amended Accusation is attached hereto as Exhibit A and hereby incorporated by reference as if fully set forth herein

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, discussed with counsel, and fully understands the charges and allegations in First Amended Accusation No. 800-2018-051171. Respondent has also carefully read, discussed with his counsel, and fully understands the effects of this Stipulated Settlement and Disciplinary Order.

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

8. Having the benefit of counsel, Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

9. Respondent understands and agrees that the charges and allegations contained in First Amended Accusation No. 800-2018-051171, if proven at a hearing, constitute cause for imposing discipline upon his Physician's and Surgeon's Certificate No. G 80098.

10. Respondent stipulates that, at a hearing, Complainant could establish a *prima facie* case or factual basis for the charges and allegations contained in the First Amended Accusation; that he gives up his right to contest those charges and allegations contained in the First Amended Accusation; and that he has thereby subjected his Physician's and Surgeon's Certificate to disciplinary action.

CONTINGENCY

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

12. Respondent agrees that if an accusation is ever filed against him before the Board, all of the charges and allegations contained in First Amended Accusation No. 800-2018-051171 shall be deemed true, correct and fully admitted by Respondent for purposes of any such proceeding or any other licensing proceeding involving Respondent in the State of California.

ADDITIONAL PROVISIONS

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

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

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

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Respondent Afshin S. Gerayli, M.D.'s Physician's and Surgeon's Certificate No. G 80098 shall be and is hereby Publicly Reprimanded pursuant to California Business and Professions Code section 2227, subdivision (a), subsection (4). This Public Reprimand, which is issued in connection with the charges and allegations contained in First Amended Accusation No. 800-2018-051171, is as follows:

1. PUBLIC REPRIMAND.

Respondent failed to maintain adequate and accurate records in connection with the monitoring and prescribing of opioids to Patient A, as alleged in the First Amended Accusation, paragraphs 13 and 14.

2. PRESCRIBING PRACTICES COURSE.

Within sixty (60) calendar days of the effective date of this Decision, Respondent shall enroll in a course in prescribing practices approved in advance by the Board or its designee. Respondent shall provide the approved course provider with any information and documents that the approved course provider may deem pertinent. Respondent shall participate in and successfully complete the classroom component of the course not later than twelve (12) months after Respondent's initial enrollment. Respondent shall successfully complete any other component of the course within one (1) year of enrollment. The prescribing practices course shall be at Respondent's expense and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

A prescribing practices course taken after the acts that gave rise to the charges contained in the First Amended Accusation, but prior to the effective date of the Decision may, in the sole

discretion of the Board or its designee, be accepted towards the fulfillment of this condition if the course would have been approved by the Board or its designee had the course been taken after the effective date of this Decision.

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

3. MEDICAL RECORD KEEPING COURSE.

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

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

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

4. INVESTIGATION/ENFORCEMENT COST RECOVERY.

Respondent is hereby ordered to reimburse the Board its costs of enforcement, including legal review and expert review, as applicable, eleven thousand six hundred twenty dollars ($11,620.00). Costs shall be payable to the Board. Failure to pay such costs shall be considered

a violation of this agreement and shall be deemed an act of unprofessional conduct and a separate and distinct basis for discipline.

Any and all requests for a payment plan shall be submitted in writing by Respondent to the Board.

The filing of bankruptcy by Respondent shall not relieve Respondent of the responsibility to repay investigation and enforcement costs, including expert review costs (if applicable).

5. FAILURE TO COMPLY. Any failure by Respondent to comply with the terms and conditions of the Disciplinary Order set forth above shall constitute unprofessional conduct and grounds for further disciplinary action.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Raymond J. McMahon, Esq. I fully understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate No. G 80098. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: 7-22-22

AFSHIN S. GERAYLI, M.D.
Respondent

I have read and fully discussed with Respondent Afshin S. Gerayli, M.D., the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: July 22, 2022

RAYMOND J. MCMAHON, ESQ.
Attorney for Respondent

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ENDORSEMENT

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

DATED: July 27, 2022

Respectfully submitted,

ROB BONTA
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General

JOSEPH F. MCKENNA III
Deputy Attorney General
Attorneys for Complainant

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Doc.No.83513151

Exhibit A

First Amended Accusation No. 800-2018-051171

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Attorneys for Complainant

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

In the Matter of the First Amended Accusation Against: **AFSHIN S. GERAYLI, M.D.** **35 Creek Road** **Irvine, California 92604** **Physician's and Surgeon's Certificate No. G 80098,** Respondent.	Case No. 800-2018-051171 OAH No. 2021100562 **FIRST AMENDED ACCUSATION**

Complainant alleges:

PARTIES

1. William Prasifka (Complainant) brings this First Amended Accusation solely in his official capacity as the Executive Director of the Medical Board of California (Board), Department of Consumer Affairs.

2. On or about October 26, 1994, the Medical Board issued Physician's and Surgeon's Certificate No. G 80098 to Afshin S. Gerayli, 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 September 30, 2022, unless renewed.

JURISDICTION

3. This First Amended Accusation which supersedes Accusation No. 800-2018-051171, filed on July 28, 2021, in the above-entitled matter, is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

STATUTORY PROVISIONS

4. Section 2227 of the Code states:

> (a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter:
>
> (1) Have his or her license revoked upon order of the board.
>
> (2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.
>
> (3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.
>
> (4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.
>
> (5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.
>
> (b) Any matter heard pursuant to subdivision (a), except for warning letters, medical review or advisory conferences, professional competency examinations, continuing education activities, and cost reimbursement associated therewith that are agreed to with the board and successfully completed by the licensee, or other matters made confidential or privileged by existing law, is deemed public, and shall be made available to the public by the board pursuant to Section 803.1.

5. Section 2234 of the Code states, in relevant part:

> The board shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:
>
> (a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the violation of, or conspiring to violate any provision of this chapter.
>
> (b) Gross negligence.
>
> (c) Repeated negligent acts.
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> ...

6. Unprofessional conduct under section 2234 of the Code is conduct which breaches the rules or ethical code of the medical profession, or conduct which is unbecoming to a member in good standing of the medical profession, and which demonstrates an unfitness to practice medicine. (*Shea v. Board of Medical Examiners* (1978) 81 Cal.App.3d 564, 575.)

7. Section 2266 of the Code states:

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

COST RECOVERY

8. Section 125.3 of the Code states:

> (a) Except as otherwise provided by law, in any order issued in resolution of a disciplinary proceeding before any board within the department or before the Osteopathic Medical Board upon request of the entity bringing the proceeding, the administrative law judge may direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.
>
> (b) In the case of a disciplined licentiate that is a corporation or a partnership, the order may be made against the licensed corporate entity or licensed partnership.
>
> (c) A certified copy of the actual costs, or a good faith estimate of costs where actual costs are not available, signed by the entity bringing the proceeding or its designated representative shall be prima facie evidence of reasonable costs of investigation and prosecution of the case. The costs shall include the amount of investigative and enforcement costs up to the date of the hearing, including, but not limited to, charges imposed by the Attorney General.
>
> (d) The administrative law judge shall make a proposed finding of the amount of reasonable costs of investigation and prosecution of the case when requested pursuant to subdivision (a). The finding of the administrative law judge with regard to costs shall not be reviewable by the board to increase the cost award. The board may reduce or eliminate the cost award, or remand to the administrative law judge if the proposed decision fails to make a finding on costs requested pursuant to subdivision (a).
>
> (e) If an order for recovery of costs is made and timely payment is not made as directed in the board's decision, the board may enforce the order for repayment in any appropriate court. This right of enforcement shall be in addition to any other rights the board may have as to any licensee to pay costs.
>
> (f) In any action for recovery of costs, proof of the board's decision shall be conclusive proof of the validity of the order of payment and the terms for payment.
>
> (g)(1) Except as provided in paragraph (2), the board shall not renew or reinstate the license of any licensee who has failed to pay all of the costs ordered under this section.
>
> (2) Notwithstanding paragraph (1), the board may, in its discretion, conditionally renew or reinstate for a maximum of one year the license of any licensee who demonstrates financial hardship and who enters into a formal agreement with the board to reimburse the board within that one-year period for the unpaid costs.

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

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

(j) This section does not apply to any board if a specific statutory provision in that board's licensing act provides for recovery of costs in an administrative disciplinary proceeding.

FIRST CAUSE FOR DISCIPLINE

(Gross Negligence)

9. Respondent has subjected his Physician's and Surgeon's Certificate No. G 80098 to disciplinary action under sections 2227 and 2234, as defined in section 2234, subdivision (b), of the Code, in that Respondent committed gross negligence in his care and treatment of Patient A,[1] as more particularly alleged hereinafter:

10. **Patient A**

(a) On or about August 16, 2016, Patient A, a then-71-year-old female, was seen at Respondent's clinic for a follow up visit and medication refills. Patient A was already an established patient at Respondent's clinic where she received treatment for chronic headaches, neck/back pain, and bilateral leg and knee pain. At this visit, her refilled medications included opioids, benzodiazepines, and sedatives. Patient A also refilled a prescription for Fioricet with codeine.

(b) On or about December 7, 2017, Respondent removed codeine from the Fioricet prescription in order to reduce the amount of opiates Patient A was taking, according to the progress note for the clinical visit.

(c) On or about March 6, 2018, CURES was checked and it was noted that Patient A had recently obtained a prescription for Fioricet with codeine from another medical provider, according to the progress note for the clinical visit.

(d) Between in or around May 2017, and in or around March 2019,

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[1] To protect the privacy of the patient involved in this matter, the patient's name has not been included in this pleading. Respondent is aware of the identity of Patient A.

Patient A obtained Fioricet with codeine from other medical providers and on multiple occasions. Progress notes from Respondent's clinic during this time frame documented that Patient A had been admonished not to obtain her opiate medications from other medical providers, and that these medications should only be obtained from Respondent's clinic. Patient A, notwithstanding the admonishment, continued to obtain Fioricet prescriptions from medical providers outside of Respondent's clinic.[2]

(e) On or about September 6, 2018, Patient A was seen at Respondent's clinic for a follow up visit and medication refills. The progress note documented that Patient A was scheduled to undergo a "complex surgery" on her spine the following month. The progress note further documented that Patient A had been "medically cleared" for the surgical procedure by Respondent. Finally, the note indicated that Patient A was to return in three months for a follow up visit at Respondent's clinic in December.

(f) Patient A's medical record from Respondent's clinic contained correspondence received from the surgeon, Dr. F.M., after the spine surgery was performed.[3] The correspondence provided medical updates to Respondent on multiple dates including, on or about November 28, 2018, December 19, 2018, and January 22, 2019.

(g) On or about December 19, 2018, Dr. F.M. personally contacted Respondent's clinic to discuss his concerns involving Patient A, including his observations of signs of narcotic withdrawal. Dr. F.M. did not speak with Respondent that day, but he did document a conversation that he held with another

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[2] Prior to January 31, 2019, no opioid agreement is found in Patient A's medical record from Respondent's clinic.

[3] The surgery was performed sometime between October 22 and November 9, 2018; the exact date is not found in Patient A's medical record from Respondent's clinic.

provider, Dr. M.S., at the clinic.[4] Dr. M.S. agreed to see Patient A the following day, according to Dr. F.M.'s progress note from December 19, 2018.

(h) Patient A was not seen at Respondent's clinic until more than a month later, on or about January 30, 2019. Patient A was seen by Dr. M.S. that day. Dr. M.S. documented that he had spoken to Dr. F.M. a month earlier and had advised Dr. F.M. that Patient A was Respondent's patient, according to the progress note. Dr. M.S. further documented that he would not be taking over care of Patient A, and that she should follow up with Respondent if she had concerns with her pain management.

(i) On or about January 31, 2019, Patient A returned to Respondent's clinic and was seen by Respondent. Respondent documented information related to Patient A's chronic pain issues and noted the recent back surgeries performed by Dr. F.M. Respondent also noted that Dr. F.M. had been prescribing Percocet to Patient A over the last three months. However, Respondent did not document any information concerning his monitoring and management of Patient A's care and opioid prescribing between September 2018 and January 2019.

(j) Significantly, Patient A's medical record from Respondent's clinic is missing critical information including, but not limited to: a plan for continuity of care at the time of Patient A's spine surgery in October 2018; documentation of Patient A's missed follow up visit in December 2018; documentation of Dr. F.M.'s telephone call with Dr. M.S. in December 2018; documentation of a timely response following Dr. F.M's telephone call with Dr. M.S. in December 2018; and documentation of Respondent's availability to Patient A during November 2018, December 2018, and January 2019.

(k) Patient A's medical record from Respondent's clinic is also missing: records of urine drug screens; documentation of communication between

[4] During Respondent's subject interview, he characterized his relationship with Dr. M.S. as a "partner."

Respondent and Dr. M.S. regarding Patient A; records or documentation of communication with Patient A's primary care physician regarding violations of the opioid agreement; and records documenting when prescriptions were transmitted electronically to the pharmacy.

11. Respondent committed gross negligence in his care and treatment of Patient A including, but not limited to, the following:

(a) Respondent failed to provide a plan for continuity of care at the time of Patient A's spine surgery in October 2018 including, but not limited to, lack of response to presumed missed visit in December 2018, failure to respond timely to Dr. F.M.'s call in December 2018, and general unavailability to Patient A during November 2018, December 2018, and January 2019.

SECOND CAUSE FOR DISCIPLINE

(Repeated Negligent Acts)

12. Respondent has further subjected his Physician's and Surgeon's Certificate No. G 80098 to disciplinary action under sections 2227 and 2234, as defined in section 2234, subdivision (c), of the Code, in that Respondent committed repeated negligent acts in his care and treatment of Patient A, as more particularly alleged hereinafter:

13. **Patient A**

(a) Paragraphs 10 and 11, above, are hereby incorporated by reference and realleged as if fully set forth herein.

(b) Between in or around May 2017, and in or around March 2019, Patient A obtained Fioricet with codeine from other medical providers on multiple occasions, despite admonishment and in violation of the January 31, 2019 opioid agreement.

(c) Patient A's medical record from Respondent's clinic is missing: records of urine drug screens; documentation of communication between Respondent and Dr. M.S.; records or documentation of communication with Patient A's primary care physician regarding violations of the opioid agreement; and records documenting when prescriptions were transmitted electronically to the pharmacy.

14. Respondent committed repeated negligent acts in his care and treatment of Patients A, including, but not limited to, the following:

(a) Respondent failed to appropriately monitor Patient A's care and prescribing of opioids between in or around October 2018 through in or around January 2019;

(b) Respondent failed to properly and consistently monitor Fioricet with codeine prescriptions obtained by Patient A from other medical providers; and

(c) Respondent failed to maintain adequate and accurate records for Patient A including, missing records of urine drug screens, missing documentation of communication between Respondent and Dr. M.S. regarding Patient A, missing records or documentation of communication with Patient A's primary care physician regarding violations of the opioid agreement, and missing records documenting when prescriptions were transmitted electronically to the pharmacy.

THIRD CAUSE FOR DISCIPLINE

(Failure to Maintain Adequate and Accurate Medical Records)

15. Respondent has further subjected his Physician's and Surgeon's Certificate No. G 80098 to disciplinary action under sections 2227 and 2234, as defined in section 2266, of the Code, in that Respondent failed to maintain adequate and accurate records in connection with his care and treatment of Patient A, as more particularly alleged in paragraphs 10 through 14, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

FOURTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

16. Respondent has further subjected his Physician's and Surgeon's Certificate No. G 80098 to disciplinary action under sections 2227 and 2234 of the Code, in that Respondent has engaged in conduct which breaches the rules or ethical code of the medical profession, or conduct which is unbecoming to a member in good standing of the medical profession, and which demonstrates an unfitness to practice medicine, as more particularly alleged in paragraphs 10 through 15, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

PRAYER

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

1. Revoking or suspending Physician's and Surgeon's Certificate No. G 80098, issued to Respondent Afshin S. Gerayli, M.D.;

2. Revoking, suspending or denying approval of Respondent Afshin S. Gerayli, M.D.'s authority to supervise physician assistants pursuant to section 3527 of the Code, and advanced practice nurses;

3. Ordering Respondent Afshin S. Gerayli, M.D., to pay the Board the costs of the investigation and enforcement of this case, and if placed on probation, the costs of probation monitoring; and

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

DATED: JAN 21 2022

WILLIAM PRASIFKA
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

SD2021800916
Doc.No.83208427