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2 **BEFORE THE MEDICAL BOARD OF CALIFORNIA**
3 **DEPARTMENT OF CONSUMER AFFAIRS**
4 **STATE OF CALIFORNIA**

5 In the Matter of the Investigation of:
6 Simone Melissa Gold, M.D.,

Case No. 800-2021-074424

7 Responding Party,
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**AFFIDAVIT OF SIMONE MELISSA
GOLD, M.D.**

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11 Dr. Simone Gold, a resident of Naples, State of Florida, personally came and appeared
12 before the undersigned Notary Public and makes her statement under oath, in good faith, and
13 under penalty of perjury, of sincere belief and personal knowledge or on information and belief,
14 that the following matters and facts are true and correct to the best of her personal knowledge:

15 1. I am a licensed medical doctor, licensed by the State of California pursuant to lic #
16 G 70224. That certificate is in full force and effect.

17 2. On January 30, 2023, the Medical Board of California (hereinafter MBC) issued an
18 Accusation for disciplinary action against my license, signed by the Deputy Director of the MBC,
19 Reji Varghese

20 3. At all times mentioned herein, Kristina D. Lawson was, and currently is, the
21 President of the Medical Board of California, the party bringing the action against my license.

22 4. In a letter dated June 10, 2022, attached hereto as Exhibit A, MBC President
23 Lawson made numerous accusations against me personally, claiming among many other things,
24 that I had harassed her for 6 months via an organization called America's Frontline Doctors,
25 causing her great anxiety and fear, and that I had called for her to resign her position as MBC
26 President.
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1 5. On December 10, 2021, the San Francisco Chronicle published an article setting
2 forth MBC President Lawson's allegations against me regarding events allegedly occurring on
3 Dec. 6, 2021. Included in that article was the following statement:

4 "Bill Prasifka, executive director of the Medical Board of California, said all board members and
5 staff have been "advised to remain vigilant to their surroundings and provided security
6 reminders." He said that in addition to the Walnut Creek police, the California Highway Patrol and
7 Department of Consumer Affairs have been notified about the incident. (See Exhibit "B" attached
8 hereto.)

9 6. Based on public California Legislative records created by the Legislative Analyst,
10 Assembly Bill 2098 was introduced in the Assembly on February 14, 2022 to attack the licenses of
11 California doctors who spread "disinformation and misinformation" about Covid. At a 4/19/22
12 Assembly hearing on the bill, attached hereto as Exhibit "C", I was specifically targeted on page 9
13 of the record:

14 "p. 9. In December of 2021, it was reported that representatives of an anti-vaccination
15 organization called America's Frontline Doctors had stalked and intimidated Kristina Lawson,
16 President of the MBC.¹² This harassment was escalated in April of 2022 when that same
17 organization "released a 21-minute video that depicts Lawson in Nazi regalia, a whip in her hand
18 and swastika on her shoulder, and shows a clip of the garage confrontation validating Lawson's
19 description."

20 "America's Frontline Doctors was founded by Dr. Simone Gold, who holds an active
21 license in California as a physician. Dr. Gold and her organization have vociferously promoted
22 hydroxychloroquine as a COVID-19 treatment, despite evidence increasingly showing it to be
23 ineffective and potentially unsafe.¹⁴ Dr. Gold has engaged in multiple campaigns to stoke public
24 distrust in COVID-19 vaccines, characterizing them as "experimental" despite numerous safety
25 and efficacy trials successfully confirming their safety and efficacy.

26 "Dr. Gold spoke at a rally held in conjunction with the attempted insurrection on the
27 United States Capitol on January 6, 2021; she was arrested and subsequently pleaded guilty to a
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1 misdemeanor relating to that event. Despite what would appear to be repeated conduct
2 perpetrated by Dr. Gold involving the dissemination of false information regarding COVID-19,
3 Dr. Gold's license remains active with the MBC and there appears to be no record of any
4 disciplinary action taken against her.

5 "Given the air of legitimacy she sustains from her status as a licensed physician, Dr. Gold
6 likely serves as an illustrative example of the type of behavior that the author of this bill seeks to
7 unequivocally establish as constituting unprofessional conduct for physicians in California.
8 Regardless of whether similar authority is already available to the MBC through other enforceable
9 provisions in the Medical Practice Act, it is understandable that the author desires to make this
10 authority explicit and confirm that doctors licensed in California who disseminate misinformation
11 or disinformation should be held fully accountable."

12 7. On May 13, 2022, the Analyst reported on an Assembly floor hearing on 2098,
13 quoting the same information quoted above, targeting me.

14 8. On June 27, 2022, the Analyst reported that the MBC supported passage of 2098
15 with an amendment.

16 9. On August 22, the Analyst reported on an Assembly floor hearing on 2098 again
17 quoting the same information quoted above, targeting me.

18 10. I do not know who provided the Legislative Analyst with the information
19 identifying me in paragraph No's 6.7. and 9, above.

20 11. Based on the foregoing, it is clear that President Lawson has a personal vendetta
21 against me and that I cannot receive a fair and impartial hearing before the MBC if President
22 Lawson participates in any way, or has participated in any way leading up to the Accusation, or in
23 any decision involving the Accusation against me.

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