XAVIER BECERRA
Attorney General of California
MARY CAIN-SIMON
Supervising Deputy Attorney General
JOSHUA M. TEMPLET
Deputy Attorney General
State Bar No. 267098
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-3533
Facsimile: (415) 703-5480
E-mail: Joshua.Templet@doj.ca.gov
Attorneys for Complainant

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO Feb. 22 2019
BY [illegible] ANALYST

BEFORE THE
PHYSICIAN ASSISTANT BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: **Sarah Nichole Hodosh, P.A.** **133 Promontory Ter** **San Ramon, CA 94583-1553** **Physician Assistant** **License No. PA 53678,** Respondent.	Case No. 950-2018-001895 **A C C U S A T I O N**

Complainant alleges:

PARTIES

1. Maureen L. Forsyth (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the Physician Assistant Board, Department of Consumer Affairs (Board).

2. On August 19, 2016, the Board issued Physician Assistant License Number PA 53678 to Sarah Nichole Hodosh, P.A. (Respondent). The license was in full force and effect at all times relevant to the charges brought herein and will expire on April 30, 2020, unless renewed.

///

3. On January 15, 2019, Complainant filed a Petition for Interim Order of Suspension of Respondent's Physician Assistant license. Respondent subsequently agreed to entry of the interim order of suspension. On February 6, 2019, an administrative law judge on behalf of the Board entered an Interim Order of Suspension prohibiting Respondent from practicing as a physician assistant, as stipulated by the parties. The order is in effect and Respondent's license remains suspended pending the Board's Decision and Order.

JURISDICTION

4. This Accusation is brought before the Board, under the authority of the following laws:

5. Business and Professions Code, section 3527, subdivision (a), provides that the Board may suspend, revoke, or impose probationary conditions on a physician assistant license for unprofessional conduct, which includes but is not limited to a violation of the Physician Assistant Practice Act, a violation of the Medical Practice Act, or a violation of the regulations adopted by the Board or the Medical Board of California.

6. Business and Professions Code, section 2234, provides that the Board shall take action against a licensee who is charged with unprofessional conduct, which includes but is not limited to the commission of any act involving dishonesty or corruption.

7. Business and Professions Code, section 2238, provides that a violation of any federal or state statute or regulations regulating dangerous drugs or controlled substances constitutes unprofessional conduct.

8. Business and Professions Code, section 2239, provides that the use or prescribing for or administering to herself of any controlled substance, or the use of any of the dangerous drugs specified in Section 4022, in such a manner as to be dangerous or injurious to the licensee, or to any other person or to the public, or to the extent that such use impairs the ability of the licensee to practice medicine safely constitutes unprofessional conduct.

9. Business and Professions Code, section 2242, subdivision (a), provides that prescribing, dispensing, or furnishing dangerous drugs without an appropriate prior examination and a medical indication constitutes unprofessional conduct.

10. Business and Professions Code, section 2261, provides that knowingly making or signing any certificate or other document directly or indirectly related to the practice of medicine that falsely represents the existence or nonexistence of a state of facts constitutes unprofessional conduct.

11. Business and Professions Code, section 2266, 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."

12. Business and Professions Code, section 4022, states:

> "Dangerous drug" or "dangerous device" means any drug or device unsafe for self-use in humans or animals, and includes the following:
>
> (a) Any drug that bears the legend: "Caution: federal law prohibits dispensing without prescription," "Rx only," or words of similar import.
>
> (b) Any device that bears the statement: "Caution: federal law restricts this device to sale by or on the order of a _____," "Rx only," or words of similar import, the blank to be filled in with the designation of the practitioner licensed to use or order use of the device.
>
> (c) Any other drug or device that by federal or state law can be lawfully dispensed only on prescription or furnished pursuant to Section 4006.

13. Business and Professions Code, section 822, states:

> If a licensing agency determines that its licentiate's ability to practice his or her profession safely is impaired because the licentiate is mentally ill, or physically ill affecting competency, the licensing agency may take action by any one of the following methods:
>
> (a) Revoking the licentiate's certificate or license.
>
> (b) Suspending the licentiate's right to practice.
>
> (c) Placing the licentiate on probation.
>
> (d) Taking such other action in relation to the licentiate as the licensing agency in its discretion deems proper.
>
> The licensing agency shall not reinstate a revoked or suspended certificate or license until it has received competent evidence of the absence or control of the condition which caused its action and until it is satisfied that with due regard for the public health and safety the person's right to practice his or her profession may be safely reinstated.

///

///

14. Health and Safety Code, section 11368, states

> Every person who forges or alters a prescription or who issues or utters an altered prescription, or who issues or utters a prescription bearing a forged or fictitious signature for any narcotic drug, or who obtains any narcotic drug by any forged, fictitious, or altered prescription, or who has in possession any narcotic drug secured by a forged, fictitious, or altered prescription, shall be punished by imprisonment in the county jail for not less than six months nor more than one year, or in the state prison.

15. Health and Safety Code, section 11153, subdivision (a), states:

> A prescription for a controlled substance shall only be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his or her professional practice. The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, but a corresponding responsibility rests with the pharmacist who fills the prescription. Except as authorized by this division, the following are not legal prescriptions: (1) an order purporting to be a prescription which is issued not in the usual course of professional treatment or in legitimate and authorized research; or (2) an order for an addict or habitual user of controlled substances, which is issued not in the course of professional treatment or as part of an authorized narcotic treatment program, for the purpose of providing the user with controlled substances, sufficient to keep him or her comfortable by maintaining customary use.

16. Health and Safety Code section 11154, subdivision (a), provides that except in the regular practice of his or her profession, no person shall knowingly prescribe, administer, dispense or furnish a controlled substance to or for any person not under his or her treatment for a pathology or condition.

17. Health and Safety Code, section 11157, provides that: "No person shall issue a prescription that is false or fictitious in any respect."

18. Health and Safety Code, section 11170, provides that: "No person shall prescribe, administer, or furnish a controlled substance for himself."

19. Health and Safety Code, section 11173, states:

> (a) No person shall obtain or attempt to obtain controlled substances, or procure or attempt to procure the administration of or prescription for controlled substances, (1) by fraud, deceit, misrepresentation, or subterfuge; or (2) by the concealment of a material fact.
>
> (b) No person shall make a false statement in any prescription, order, report, or record, required by this division.

///

///

(c) No person shall, for the purpose of obtaining controlled substances, falsely assume the title of, or represent himself to be, a manufacturer, wholesaler, pharmacist, physician, dentist, veterinarian, registered nurse, physician's assistant, or other authorized person.

. . .

20. California Code of Regulations, title 16, section 1399.521, states:

In addition to the grounds set forth in section 3527, subd. (a), of the code the board may deny, issue subject to terms and conditions, suspend, revoke or place on probation a physician assistant for the following causes:

(a) Any violation of the State Medical Practice Act which would constitute unprofessional conduct for a physician and surgeon.

. . .

(d) Performing medical tasks which exceed the scope of practice of a physician assistant as prescribed in these regulations.

21. California Code of Regulations, title 16, section 1399.525, states:

For the purposes of the denial, suspension or revocation of a license pursuant to division 1.5 (commencing with section 475) of the code, a crime or act shall be considered to be substantially related to the qualifications, functions or duties of a person holding a license under the Physician Assistant Practice Act if to a substantial degree it evidences present or potential unfitness of a person holding such a license to perform the functions authorized by the license in a manner consistent with the public health, safety or welfare. Such crimes or acts shall include, but are not limited to, the following:

(a) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of, or conspiring to violate any provision or term of the Medical Practice Act.

(b) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of, or conspiring to violate any provision or term of the Physician Assistant Practice Act.

. . .

(e) Any crime or act involving the sale, gift, administration, or furnishing of narcotics or dangerous drugs or dangerous devices, as defined in Section 4022 of the code.

. . .

COST RECOVERY

22. Section 125.3 of the Business and Professions Code provides that the Board may request the administrative law judge to direct a licensee found to have committed a violation 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.

FACTS

23. Respondent practiced as a physician assistant at the Northern California Spine Institute (NCSI) in Pleasanton, California, since September 2016. On May 11, 2018, the patient care coordinator for one of NCSI's physicians, Kevin C. Booth, M.D., overheard Respondent on the telephone with a pharmacist calling in a prescription for herself, using the care coordinator's name. Respondent asked the care coordinator not to tell Dr. Booth of her discovery. Soon thereafter, NCSI determined that Respondent had been self-prescribing narcotics during the preceding months by impersonating Dr. Booth and his care coordinator on the telephone and by forging Dr. Booth's signature on prescription forms. NCSI terminated Respondent's employment. On May 16, 2018, NCSI submitted a complaint to the Physician Assistant Board regarding Respondent's self-prescribing and forged prescriptions. The Board subsequently investigated the case and determined that, between February 8, 2017 and May 11, 2018, Respondent had prescribed well over 1,000 tablets and capsules of medications, primarily narcotics, by fraudulently misusing Dr. Booth's prescribing authority and by misusing her own prescribing authority as a physician assistant.

Respondent has a history of substance abuse and has been diagnosed with a severe narcotic addiction.

24. The investigator assigned by the Health Quality Investigation Unit to investigate this case on behalf of the Board interviewed Respondent at her home, on September 28, 2018. During the interview, Respondent admitted to being a drug addict and stated that she had sought treatment for addiction by enrolling in an outpatient rehabilitation program at Diablo Valley Drug and Alcohol Services. Respondent began treatment in May 2018, after NCSI terminated her employment.

///

///

25. On May 15, 2018, Respondent went to her primary care physician's office, where she told the treating physician assistant that she had "been abusing narcotic medications over the last 4 months."[1] Respondent confided that she had "used both meds prescribed to her directly and some from friends" and had been taking as many as "eight Tylenol #3 daily," referring to acetaminophen-codeine[2], a narcotic. That same day, Respondent was diagnosed with "narcotic addiction," and was prescribed a narcotic in an effort to wean her off of opioids. On May 17, 2018, a physician with Diablo Valley Drug and Alcohol Services began treating Respondent for her dependence on opioids by prescribing her Suboxone, a narcotic used to treat addiction.

26. Respondent presented to Diablo Valley Drug and Alcohol Services with a chief complaint of "[o]piate use disorder, severe." During the outpatient rehabilitation program, a DVDAS physician diagnosed Respondent with and treated her for "[o]piate use disorder, severe," anxiety, and depression. In addition to narcotics, Respondent had also been addicted to gabapentin,[3] from which she exhibited symptoms of withdrawal. The DVDAS physician prescribed her a tapering dose of gabapentin to wean her from this addiction.

Respondent forged prescriptions and impersonated Dr. Booth and his care coordinator to prescribe herself narcotics and other medications.

27. During her September 28, 2018 interview, Respondent admitted unlawfully writing prescriptions and calling in telephone prescriptions to obtain medications, including controlled substances, for her personal use. Respondent wrote herself the following prescriptions bearing the name, DEA number, and forged signature of Dr. Booth:

---

[1] In fact, Respondent's unlawful self-prescribing and diversion of narcotics and other medications that she misused began well before early 2018, in February 2017.

[2] Acetaminophen-codeine is used to relieve pain and contains a narcotic pain reliever (codeine) and a non-narcotic pain reliever (acetaminophen). Common brand names of this drug include Tylenol with Codeine #3. Acetaminophen-codeine is a Schedule III controlled substance, (Health & Saf. Code, § 11056(e)(2)), and is a dangerous drug as defined by Business and Professions Code, section 4022.

[3] Gabapentin is an anticonvulsant drug used to treat epileptic seizures and neuropathic pain (pain that results from nerve damage), among other conditions. It is a dangerous drug as defined by Business and Professions Code, section 4022, but it is neither a narcotic nor scheduled as a controlled substance.

- March 12, 2018 prescription by Kevin C. Booth, M.D. to Respondent for 20 tablets of acetaminophen-codeine phosphate 300 mg-30 mg (3-day supply) (RX# 08887025);
- March 22, 2018 prescriptions by Kevin C. Booth, M.D. to Respondent for 30 tablets of oxycodone[4] 10 mg (7-day supply) (RX# 08888211) and 30 tablets of acetaminophen-codeine phosphate 300 mg-30 mg (4-day supply) (RX# 08888210); and
- April 12, 2018 prescriptions by Kevin C. Booth, M.D. to Respondent for 30 tablets of oxycodone hydrochloride-acetaminophen[5] 325 mg-10 mg (3-day supply) (RX# 08890383), a pack of 4 mg tablets of methylprednisolone[6] (RX# 8890381), and 30 tablets of tizanidine[7] 4 mg (RX# 8890382).

Respondent further supported the March 22, 2018 prescription (RX# 08888211) with forged, handwritten notes purporting to have been written by Dr. Booth stating, "Pt. Seen today, scheduled for procedure," and stating that the prescribed medication was needed for "severe break-thru pain."

28. By impersonating Dr. Booth's patient care coordinator on the telephone and using Dr. Booth's name and DEA number, Respondent also requested the following prescriptions for herself:

- March 6, 2018 prescriptions by Kevin C. Booth, M.D. to Respondent for 15 tablets of acetaminophen-codeine phosphate 300 mg-30 mg (2-day supply) (RX# 08886344) and 15 tablets of cyclobenzaprine[8] 10 mg (RX# 8886356), phoned in by "Karla";

---

[4] Oxycodone is a narcotic used to relieve pain and is a Schedule II controlled substance, (Health & Saf. Code, § 11055(b)(1)(M)), and a dangerous drug as defined by Business and Professions Code, section 4022.

[5] Oxycodone hydrochloride-acetaminophen is used to relieve pain and contains a narcotic pain reliever (oxycodone) and a non-narcotic pain reliever (acetaminophen). Common brand names of this drug include Percocet. Oxycodone hydrochloride-acetaminophen is a Schedule II controlled substance, (Health & Saf. Code, § 11055(b)(1)(M)), and is a dangerous drug as defined by Business and Professions Code, section 4022.

[6] Methylprednisolone is a corticosteroid that provides relief for inflamed areas of the body. It is a dangerous drug as defined by Business and Professions Code, section 4022.

[7] Tizanidine is a muscle relaxant that acts on the central nervous system and is used to treat muscle spasms. It is a dangerous drug as defined by Business and Professions Code, section 4022.

[8] Cyclobenzaprine is a muscle relaxant that acts on the central nervous system. It is a dangerous drug as defined by Business and Professions Code, section 4022.

- April 24, 2018 prescription by Kevin C. Booth, M.D. to Respondent for 30 tablets of acetaminophen-codeine phosphate 300 mg-30 mg (5-day supply) (RX# 08891598), phoned in by "Karla"; and
- May 11, 2018 prescriptions by Kevin C. Booth, M.D. to Respondent for 40 tablets of acetaminophen-codeine phosphate 300 mg-30 mg (7-day supply) (RX# 08893448) and 40 tablets of tizanidine 4 mg (RX# 8893449), phoned in by "Sarah."

29. Respondent also requested the following prescriptions for herself, again by impersonating Dr. Booth and using his DEA number:

- December 5, 2017 prescription by Kevin C. Booth, M.D. to Respondent for 90 capsules of gabapentin 300 mg (RX# 8876351);
- February 18, 2018 prescription by Kevin C. Booth, M.D. to Respondent for 90 capsules of gabapentin 300 mg (RX# 8884528);
- March 16, 2018 prescription by Kevin C. Booth, M.D. to Respondent for 90 capsules of gabapentin 300 mg (RX# 8884528); and
- April 11, 2018 prescription by Kevin C. Booth, M.D. to Respondent for 90 capsules of gabapentin 300 mg (RX# 8887560).

Respondent also misused Dr. Booth's prescribing authority to unlawfully prescribe and obtain narcotics under the name of her mother.

30. During her September 28, 2018 interview, Respondent admitted that she had obtained medications from multiple prescriptions under the name of her mother, Joan Hodosh. NCSI's Chief Operating Officer reported that while he was cleaning out Respondent's desk following her termination, he discovered a bottle of prescription narcotics bearing Respondent's mother's name. The medication label indicated that Dr. Booth had prescribed the medication to Respondent's mother. In fact, Respondent's mother, who lives in Rhode Island, had never been a patient of NCSI or Dr. Booth.

31. The bottle of prescription narcotics found in Respondent's desk was one of several medications that Respondent admitted obtaining after having misused Dr. Booth's prescribing

authority to prescribe it to her mother. Respondent used Dr. Booth's DEA number to request the following prescriptions for her personal use:

- November 3, 2017 prescription by Kevin C. Booth, M.D. to Respondent's mother for 30 tablets of acetaminophen-codeine phosphate 300 mg-30 mg (8-day supply), phoned in by "Sarah" (RX# 08872677) (this was the prescription for the bottle of medication discovered in Respondent's desk at NCSI);
- December 5, 2017 prescription by Kevin C. Booth, M.D. to Respondent's mother for 30 tablets of acetaminophen-codeine phosphate 300 mg-30 mg (5-day supply), phoned in by "Sarah" (RX# 08876344); and
- March, 15, 2018 prescription by Kevin C. Booth, M.D. to Respondent's mother for 30 tablets of acetaminophen-codeine phosphate 300 mg-30 mg (5-day supply), phoned in by "Sarah" (RX# 08887380).

Each of these prescriptions was filled by the same CVS pharmacy in San Ramon, California where Respondent had her own prescriptions filled.

Respondent also misused her own prescribing authority as a physician assistant to unlawfully prescribe and obtain narcotics under the names of her friends.

32. During her September 28, 2018 interview, Respondent also said that she had obtained medications from multiple prescriptions under the name of her friend, R.T.[9] Respondent wrote over two dozen prescriptions for narcotics filled in R.T.'s name, between February 8, 2017 and April 30, 2018. Respondent stated that R.T. was only aware of one of these prescriptions, which they "shared." R.T. had no knowledge of the other prescriptions that she wrote to him, which Respondent obtained for her personal use.

///

///

///

///

[9] This individual is designated as R.T. to protect his privacy. Respondent knows the name of this person and can confirm his identify through discovery.

33. Respondent also told the investigator that she had prescribed medication without any medical purpose to another friend, R.B.[10] Respondent wrote five prescriptions that were filled in R.B.'s name, between December 31, 2017 and February 18, 2018, four of which were for narcotics (oxycodone hydrochloride-acetaminophen 325 mg-10 mg) and one which was for diazepam.[11]

FIRST CAUSE FOR DISCIPLINE

(Self-Prescribing, Prescribing Without Indication, Dishonesty/Corruption, False Documents, Forged Prescriptions, Obtaining Controlled Substances by Fraud or Deceit, Gifting Dangerous Drugs, Inadequate Records)

34. The foregoing paragraphs of this Complaint are re-alleged and incorporated by reference as if fully set forth herein.

35. Since approximately February 2017, Respondent has engaged in a pattern of conduct that violates the Physician Assistant Practice Act and the Medical Practice Act. During this time, Respondent abused and became severely addicted to narcotic drugs and other medications, taking as many as eight tablets of acetaminophen-codeine per day, which she fraudulently prescribed to herself by impersonating and forging the signature of a physician at her place of employment. Respondent also misused the physician's prescribing authority to unlawfully prescribe and obtain narcotics under the name of her mother. In addition, Respondent misused her own prescribing authority as a physician assistant to unlawfully prescribe and obtain narcotics under the names of her friends, often without their knowledge.

36. Respondent's creation of fraudulent prescriptions to obtain medication for her personal use was knowing and calculated. She completed NCSI prescription forms with Dr. Booth's name and DEA number and forged his signature. Respondent also called in prescriptions by providing Dr. Booth's name and DEA number to the pharmacy and both misrepresenting over the telephone that Dr. Booth had delegated prescribing authority to her and impersonating Dr.

---

[10] This individual is designated as R.B. to protect her privacy. Respondent knows the name of this person and can confirm her identify through discovery.

[11] Diazepam is a benzodiazepine and is used to treat anxiety, among other conditions. Valium is a common brand name of this drug. Diazepam is a Schedule IV controlled substance, (Health & Saf. Code, § 11057(d)(9)), and is a dangerous drug as defined by Business and Professions Code, section 4022.

Booth's patient care coordinator. She used these false, unauthorized prescriptions—18 in total—to prescribe both herself and her mother narcotics and other medications, which she in turn obtained for her personal use.

37. Respondent also misused her own prescribing authority, as a physician assistant, to unlawfully prescribe and obtain narcotics under the names of her friends. Respondent wrote over two dozen prescriptions for narcotics filled in the name of her friend. She "shared' medication from one of these prescriptions with her friend, and she kept the medication from the other prescriptions for herself. Her friend was unaware that she had diverted medication from prescriptions in his name. Respondent also unlawfully wrote prescriptions for narcotics to another friend, none of which was for a legitimate medical purpose and for which she maintained no records.

38. Respondent's conduct constitutes unprofessional conduct and cause for discipline based on Business and Professions Code, section 2234 (general unprofessional conduct and the commission of any act involving dishonesty or corruption), Business and Professions Code, section 2238 (violation of statute or regulation regulating dangerous drugs or controlled substances), Business and Professions Code, section 2242(a) (prescribing or furnishing dangerous drugs without an appropriate prior examination and a medical indication), Business and Professions Code, section 2261 (false document), Business and Professions Code, section 2266 (inadequate records), Health and Safety Code, section 11368 (prescribing or obtaining narcotic drugs by forged prescription), Health and Safety Code, section 11153(a) (illegitimate or illegal prescribing of controlled substances), Health and Safety Code, section 11154(a) (prescribing to person not under treatment), Health and Safety Code, section 11157 (issuing of false or fictitious prescription), Health and Safety Code, section 11170 (self-prescribing of controlled substance), Health and Safety Code, section 11173 (obtaining of prescription for controlled substance by fraud; false statement in prescription; false assumption of title of physician), Code of Regulations, title 16, section 1399.521(d) (performing medical tasks that exceed scope of practice) and Code of Regulations, title 16, section 1399.525(e) (gift, administration, or furnishing of narcotics).

///

39. Respondent's conduct also constitutes violations of the Physician Assistant Practice Act and Medical Practice Act and the regulations adopted by the Board and the Medical Board, and further cause for discipline pursuant to Business and Professions Code, section 3527(a) (unprofessional conduct, including but not limited to violation of the Physician Assistant Practice Act, Medical Practice Act, or the regulations adopted by the Board or the Medical Board of California), California Code of Regulations, title 16, section 1399.521(a) (violation of Medical Practice Act for physician), California Code of Regulations, title 16, section 1399.525(a) (violating Medical Practice Act), and California Code of Regulations, title 16, section 1399.525(b) (violating Physician Assistant Practice Act).

SECOND CAUSE FOR DISCIPLINE

(Inability to Practice Safely Due to Physical or Mental Impairment or Use of Controlled Substance; Dangerous Use or Self-Prescribing of Controlled Substance)

40. The foregoing paragraphs of this Complaint are re-alleged and incorporated by reference as if fully set forth herein.

41. Respondent is unable to practice safely as a physician assistant due to her chemical dependence. Respondent's conduct as described above subjects her to discipline based on Business and Professions Code, section 822 (inability to practice safely due to physical or mental impairment) and Business and Professions Code, section 2239 (danger or impairment from use or prescribing of controlled substance or dangerous drug).

PRAYER

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

1. Revoking or suspending Physician Assistant License Number PA 53678, issued to Respondent;

2. Ordering Respondent to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code, section 125.3;

///

///

3. Ordering Respondent, if placed on probation, to pay the Board the costs of probation monitoring; and

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

DATED: February 22, 2019

MAUREEN L. FORSYTH
Executive Officer
Physician Assistant Board
Department of Consumer Affairs
State of California
Complainant

SF2018201930
21348678.docx