

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

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

**Navin Saran, M.D.**

**Physician's & Surgeon's  
Certificate No A 37985**

**Respondent.**

**Case No. 800-2017-038066**

**DECISION**

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

**This Decision shall become effective at 5:00 p.m. on OCT 08 2020**

**IT IS SO ORDERED SEP 08 2020**

**MEDICAL BOARD OF CALIFORNIA**



**Kristina D. Lawson, J.D., Chair  
Panel B**

1 XAVIER BECERRA  
Attorney General of California  
2 ALEXANDRA M. ALVAREZ  
Supervising Deputy Attorney General  
3 ROSEMARY F. LUZON  
Deputy Attorney General  
4 State Bar No. 221544  
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8 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:  
14 **NAVIN SARAN, M.D.**  
15 **1661 W. Broadway, #14**  
16 **Anaheim, CA 92802**  
17 **Physician's and Surgeon's Certificate**  
18 **No. A 37985,**  
19 Respondent.

Case No. 800-2017-038066

OAH No. 2019120717

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

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

22 **PARTIES**

23 1. William Prasifka (Complainant) is the Executive Director of the Medical Board of  
24 California (Board). This action was brought by then Complainant Kimberly Kirchmeyer solely in  
25 her official capacity.<sup>1</sup> Complainant is represented in this matter by Xavier Becerra, Attorney  
26 General of the State of California, by Rosemary F. Luzon, Deputy Attorney General.

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28 <sup>1</sup> Ms. Kirchmeyer became the Director of the Department of Consumer Affairs on October 28, 2019.



1 **CULPABILITY**

2 8. Respondent does not contest that, at an administrative hearing, Complainant could  
3 establish a *prima facie* case with respect to the charges and allegations contained in Accusation  
4 No. 800-2017-038066, a true and correct copy of which is attached hereto as Exhibit A, and that  
5 he has thereby subjected his Physician's and Surgeon's Certificate No. A 37985 to disciplinary  
6 action.

7 9. Respondent agrees that if an accusation is ever filed against him before the Medical  
8 Board of California, all of the charges and allegations contained in Accusation No. 800-2017-  
9 038066 shall be deemed true, correct and fully admitted by Respondent for purposes of that  
10 proceeding or any other licensing proceeding involving Respondent in the State of California.

11 10. Respondent agrees that his Physician's and Surgeon's Certificate No. A 37985 is  
12 subject to discipline and he agrees to be bound by the Board's imposition of discipline as set forth  
13 in the Disciplinary Order below.

14 **CONTINGENCY**

15 11. This Stipulated Settlement and Disciplinary Order shall be subject to approval by the  
16 Board. The parties agree that this Stipulated Settlement and Disciplinary Order shall be  
17 submitted to the Board for its consideration in the above-entitled matter and, further, that the  
18 Board shall have a reasonable period of time in which to consider and act on this Stipulated  
19 Settlement and Disciplinary Order after receiving it. By signing this stipulation, Respondent fully  
20 understands and agrees that he may not withdraw his agreement or seek to rescind this stipulation  
21 prior to the time the Board considers and acts upon it.

22 12. The parties agree that this Stipulated Settlement and Disciplinary Order shall be null  
23 and void and not binding upon the parties unless approved and adopted by the Board, except for  
24 this paragraph, which shall remain in full force and effect. Respondent fully understands and  
25 agrees that in deciding whether or not to approve and adopt this Stipulated Settlement and  
26 Disciplinary Order, the Board may receive oral and written communications from its staff and/or  
27 the Attorney General's Office. Communications pursuant to this paragraph shall not disqualify  
28 the Board, any member thereof, and/or any other person from future participation in this or any

1 other matter affecting or involving Respondent. In the event that the Board does not, in its  
2 discretion, approve and adopt this Stipulated Settlement and Disciplinary Order, with the  
3 exception of this paragraph, it shall not become effective, shall be of no evidentiary value  
4 whatsoever, and shall not be relied upon or introduced in any disciplinary action by either party  
5 hereto. Respondent further agrees that should this Stipulated Settlement and Disciplinary Order  
6 be rejected for any reason by the Board, Respondent will assert no claim that the Board, or any  
7 member thereof, was prejudiced by its/his/her review, discussion and/or consideration of this  
8 Stipulated Settlement and Disciplinary Order or of any matter or matters related hereto.

9 **ADDITIONAL PROVISIONS**

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

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

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

19 **DISCIPLINARY ORDER**

20 IT IS HEREBY ORDERED that Respondent Navin Saran, M.D., Physician's and  
21 Surgeon's Certificate No. A 37985, shall be and is hereby Publicly Reprimanded pursuant to  
22 California Business and Professions Code section 2227, subdivision (a), subsection (4). This  
23 Public Reprimand is issued in connection with the allegations relating to Respondent's care and  
24 treatment of Patient A, which are set forth in Accusation No. 800-2017-038066, as follows:

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1           1.     PUBLIC REPRIMAND.

2           Between on or about October 19, 2012, and July 9, 2013, you failed to  
3           adequately manage and document your care and treatment of Patient A, in violation  
4           of California Business and Professions Code sections 2234 and 2266, as more fully  
5           described in Accusation No. 800-2017-038066, a true and copy of which is attached  
6           hereto as Exhibit A and incorporated by reference as if fully set forth herein.

7           2.     EDUCATION COURSE.

8           Within 60 calendar days of the effective date of this Decision, Respondent shall submit to  
9           the Board or its designee for its prior approval educational program(s) or course(s) which shall  
10          not be less than 40 hours. The educational program(s) or course(s) shall be aimed at correcting  
11          any areas of deficient practice or knowledge and shall be Category I certified. The educational  
12          program(s) or course(s) shall be at Respondent's expense and shall be in addition to the  
13          Continuing Medical Education (CME) requirements for renewal of licensure. Following the  
14          completion of each course, the Board or its designee may administer an examination to test  
15          Respondent's knowledge of the course. Within one (1) year of the effective date of this Decision,  
16          Respondent shall provide proof of attendance for 65 hours of CME of which 40 hours were in  
17          satisfaction of this condition.

18          3.     PRESCRIBING PRACTICES COURSE.

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

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

6 Respondent shall submit a certification of successful completion to the Board or its  
7 designee not later than 15 calendar days after successfully completing the course, or not later than  
8 15 calendar days after the effective date of the Decision, whichever is later.

9 4. MEDICAL RECORD KEEPING COURSE.

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

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

24 Respondent shall submit a certification of successful completion to the Board or its  
25 designee not later than 15 calendar days after successfully completing the course, or not later than  
26 15 calendar days after the effective date of the Decision, whichever is later.

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**ENDORSEMENT**

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

DATED: 6-30-2020

Respectfully submitted,  
XAVIER BECERRA  
Attorney General of California  
ALEXANDRA M. ALVAREZ  
Supervising Deputy Attorney General



ROSEMARY F. LUZON  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 800-2017-038066**

1 XAVIER BECERRA  
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2 ALEXANDRA M. ALVAREZ  
Supervising Deputy Attorney General  
3 ROSEMARY F. LUZON  
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8 *Attorneys for Complainant*

FILED  
STATE OF CALIFORNIA  
MEDICAL BOARD OF CALIFORNIA  
SACRAMENTO Oct. 16 2019  
BY [Signature] ANALYST

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

12  
13 In the Matter of the Accusation Against:

Case No. 800-2017-038066

14 **Navin Saran, M.D.**  
15 **1661 W. Broadway, #14**  
**Anaheim, CA 92802**

**A C C U S A T I O N**

16 **Physician's and Surgeon's Certificate**  
17 **No. A 37985,**

18 Respondent.

19 Complainant alleges:

20 **PARTIES**

21 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official  
22 capacity as the Executive Director of the Medical Board of California, Department of Consumer  
23 Affairs (Board).

24 2. On or about February 1, 1982, the Medical Board issued Physician's and Surgeon's  
25 Certificate No. A 37985 to Navin Saran, M.D. (Respondent). The Physician's and Surgeon's  
26 Certificate was in full force and effect at all times relevant to the charges brought herein and will  
27 expire on October 31, 2021, unless renewed.

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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 2220 of the Code states:

6 Except as otherwise provided by law, the board may take action against all  
7 persons guilty of violating this chapter. . .

8 5. Section 2227 of the Code states:

9 (a) A licensee whose matter has been heard by an administrative law judge of  
10 the Medical Quality Hearing Panel as designated in Section 11371 of the Government  
11 Code, or whose default has been entered, and who is found guilty, or who has entered  
12 into a stipulation for disciplinary action with the board, may, in accordance with the  
13 provisions of this chapter:

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

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

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

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

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

24 ...

25 6. Section 2234 of the Code states:

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

...  
...

(b) Gross negligence.

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1 Trazodone. In addition, although Respondent stated in his March 19, 2018, summary of the care  
2 and treatment that he prescribed Tramadol and Soma<sup>3</sup> to Patient A, he did not document these  
3 prescriptions in his progress notes for this visit.

4 12. On or about February 24, 2012, Patient A filled a prescription for 60 tablets of Soma,  
5 which Respondent prescribed. Respondent did not document this prescription in any of his  
6 progress notes.

7 13. On or about March 8, 2012, and May 24, 2012, Respondent saw Patient A for acute  
8 bronchitis and COPD.

9 14. Between on or about March 26, 2012, and June 22, 2012, Patient A filled a  
10 prescription for 60 tablets of Soma on four occasions, which Respondent prescribed. Respondent  
11 did not document these prescriptions in any of his progress notes.

12 15. On or about July 24, 2012, Respondent saw Patient A for complaints of abdominal  
13 pain. A CT scan performed in the hospital revealed retroperitoneal lymphadenopathy.  
14 Respondent requested an oncology consultation. Respondent prescribed 60 tablets of Vicodin  
15 ES<sup>4</sup> to Patient A, which Patient A filled on or about July 24, 2012. The same day, Patient A also  
16 filled a prescription for 60 tablets of Soma, which Respondent prescribed. Respondent did not  
17 document this Soma prescription in any of his progress notes.

18 16. On or about August 16, 2012, and September 13, 2012, respectively, Patient A filled  
19 a prescription for 90 tablets of Vicodin and 100 tablets of Vicodin ES. Patient A's oncologist  
20 prescribed both medications.

21 17. On or about August 23, 2012, and September 21, 2012, Patient A filled a prescription  
22 for 60 tablets of Soma, respectively, which Respondent prescribed. Respondent did not document  
23 these prescriptions in any of his progress notes.

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25 \_\_\_\_\_  
26 <sup>3</sup> Soma (carisoprodol) is a Schedule IV controlled substance pursuant to Health and Safety  
Code section 11057, subdivision (d), and a dangerous drug pursuant to Business and Professions  
Code section 4022.

27 <sup>4</sup> Vicodin ES and Vicodin (hydrocodone bitartrate and acetaminophen) are Schedule II  
28 controlled substances pursuant to Health and Safety Code section 11055, subdivision (b), and  
dangerous drugs pursuant to Business and Professions Code section 4022.

1           18. On or about September 28, 2012, Respondent saw Patient A for "referrals." Patient  
2 A's current medications included Soma and Tramadol, among other medications. Vicodin ES  
3 and Vicodin were not listed in the progress notes for this visit. Patient A informed Respondent  
4 that a blood test from the hospital revealed Hepatitis C. Respondent ordered a hepatitis profile  
5 blood test.

6           19. On or about October 12, 2012, Patient A filled a prescription for 60 tablets of Vicodin  
7 ES, which Respondent prescribed. Respondent did not document this prescription in any of his  
8 progress notes.

9           20. On or about October 19, 2012, Patient A filled a prescription for 60 tablets of Soma,  
10 respectively, which Respondent prescribed. Respondent did not document this prescription in  
11 any of his progress notes.

12           21. On or about November 12, 2012, Respondent saw Patient A to follow up on his lab  
13 results for Hepatitis C. The results were positive and Respondent ordered a GI consult.  
14 Respondent prescribed Vicodin ES to Patient A, which Patient A filled on or about November 13,  
15 2012. Respondent did not assess or document a history of Patient A's Hepatitis C diagnosis.

16           22. On or about November 19, 2012, Respondent saw Patient A for complaints of  
17 shortness of breath and chronic pain. Respondent's diagnoses were chronic pain syndrome and  
18 acute bronchitis. Respondent prescribed Cipro and Robitussin DM to Patient A and referred him  
19 to a pain specialist, Dr. B.N.

20           23. On or about November 19, 2012, Patient A filled a prescription for 60 tablets of  
21 Soma, which Respondent prescribed. Respondent did not document this prescription in any of his  
22 progress notes.

23           24. On or about November 29, 2012, Respondent saw Patient A to refill his medications.  
24 Respondent's diagnoses were Hepatitis C and chronic pain syndrome. Respondent prescribed 60  
25 tablets of Vicodin ES to Patient A. Respondent again referred Patient A to a pain specialist.

26           25. On or about December 4, 2012, Respondent's office sent a fax to the office of pain  
27 specialist, Dr. B.N., providing Patient A's recent progress notes and laboratory results.

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1           26. On or about December 6, 2012, Respondent saw Patient A for a cold. Respondent  
2 prescribed Keflex to Patient A.

3           27. On or about December 8, 2012, and December 11, 2012, respectively, Patient A filled  
4 a prescription for 60 tablets of Vicodin ES, which Respondent prescribed.

5           28. On or about December 18, 2012, Respondent saw Patient A for a follow-up visit after  
6 his hospitalization for pneumonia and to refill medications. Respondent's diagnoses were  
7 pneumonia, Hepatitis C, and chronic pain syndrome. He prescribed 60 tablets of oxycodone<sup>5</sup> to  
8 Patient A, which Patient A filled on or about December 18, 2012. Patient A was prescribed  
9 oxycodone during his hospitalization.

10           29. On or about December 21, 2012, Patient A filled a prescription for 60 tablets of  
11 Soma, which Respondent prescribed. Respondent did not document this prescription in any of his  
12 progress notes.

13           30. On or about January 7, 2013, Respondent saw Patient A. Respondent's diagnoses  
14 were chronic pain syndrome, COPD, hypertension, and Hepatitis C. Respondent prescribed 60  
15 tablets of oxycodone to Patient A, which Patient A filled on or about the same day. According to  
16 Respondent's March 19, 2018, summary of the care and treatment, Respondent told Patient A that  
17 he needed to see a pain specialist as soon as possible and that he would no longer prescribe any  
18 pain medications to Patient A. Respondent did not document this discussion in his progress notes  
19 for this visit.

20           31. On or about January 9, 2013, Patient A filled a prescription for 60 tablets of Vicodin  
21 ES, which Respondent prescribed.

22           32. On or about January 15, 2013, Patient A had a consultation with pain specialist, Dr.  
23 B.N., and P.A. R.M. An Initial Consultation Report was prepared, which was addressed to  
24 Respondent and which identified Respondent as Patient A's primary care physician. The Initial  
25 Consultation Report referred to a cervical spine MRI, which was ordered on or about the same  
26 day and was subsequently performed on or about February 12, 2013. Patient A continued to see

27           <sup>5</sup> Oxycodone is a Schedule II controlled substance pursuant to Health and Safety Code  
28 section 11055, subdivision (b), and a dangerous drug pursuant to Business and Professions Code  
section 4022.



1 the pain specialist on or about February 5, 2013, February 13, 2013, February 19, 2013, March  
2 19, 2013, March 20, 2013, April 17, 2013, May 7, 2013, May 21, 2013, July 2, 2013, and July 30,  
3 2013. Respondent's medical records did not include the January 15, 2013, Initial Consultation  
4 Report or any other subsequent records from the pain specialist, except for the February 12, 2013,  
5 MRI Report. Respondent did not ascertain or otherwise document the pain medications that  
6 Patient A's pain specialist prescribed to him.

7 33. Between on or about February 11, 2013, and May 13, 2013, Respondent saw Patient  
8 A on four occasions for various conditions, including otitis externa, cough, acute bronchitis,  
9 chronic pain syndrome, and cellulitis of the face.

10 34. On or about June 3, 2013, Respondent saw Patient A for insomnia and complaints of  
11 stress. Respondent prescribed Ambien to Patient A. Respondent purportedly examined Patient A  
12 during this visit, however, he did not document the examination.

13 35. On or about June 20, 2013, Respondent saw Patient A for COPD with acute  
14 exacerbation, acute bronchitis, hypertension, and chronic pain.

15 36. Respondent last saw Patient A on or about July 9, 2013. Respondent noted multiple  
16 diagnoses, including hypertension, COPD, chronic pain syndrome, and Hepatitis C.<sup>6</sup> The  
17 progress notes for this visit also noted depression.

18 37. Between on or about January 16, 2013, and August 2, 2013, Patient A filled a  
19 prescription for oxycodone ranging between 30 and 90 tablets on approximately seven occasions  
20 and a prescription for extended release morphine sulfate ranging between 15 and 60 tablets on  
21 approximately eight occasions. Patient A's pain specialist prescribed both medications. On or  
22 about April 25, 2013, Patient A also filled a prescription of 20 tablets of Vicodin, which another  
23 doctor prescribed. Respondent did not document these prescriptions in any of his progress notes.

24 38. Between on or about January 21, 2013, and July 19, 2013, Patient A filled a  
25 prescription for 60 tablets of Soma on approximately seven occasions, which Respondent  
26 prescribed. Respondent did not document these prescriptions in any of his progress notes.

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28 <sup>6</sup> Respondent also appears to have noted a diagnosis of schizophrenia disorder.

1 39. On or about August 3, 2013, Patient A passed away. The cause of death was acute  
2 polydrug intoxication and the manner of death was accidental.

3 40. Respondent committed gross negligence in his care and treatment of Patient A, which  
4 included, but was not limited to the following:

5 A. Notwithstanding Patient A's major mental illness, Respondent did not  
6 coordinate the care of Patient A, including, but not limited to, by obtaining or  
7 attempting to obtain medical records relating to Patient A's care and treatment from  
8 his pain specialist, consulting oncologist, psychiatrist, and hospitalists.

9 B. Respondent did not assess or document a history of Patient A's Hepatitis  
10 C diagnosis.

11 C. Respondent regularly prescribed Soma to Patient A without reducing  
12 Patient A's opiate exposure and/or otherwise taking into account or considering  
13 Patient A's opiate exposure.

14 D. Respondent regularly prescribed Soma to Patient A despite the absence of  
15 a medical basis for chronic use and prescribing of muscle relaxants.

16 **SECOND CAUSE FOR DISCIPLINE**

17 **(Failure to Maintain Adequate and Accurate Medical Records)**

18 41. Respondent has subjected his Physician's and Surgeon's Certificate No. A 37985 to  
19 disciplinary action under sections 2227 and 2234, as defined by section 2266, of the Code, in that  
20 he failed to maintain adequate and accurate records regarding his care and treatment of Patient A,  
21 as more particularly alleged in paragraphs 9 through 40, above, which are hereby incorporated by  
22 reference and re-alleged as if fully set forth herein.

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1 THIRD CAUSE FOR DISCIPLINE

2 (General Unprofessional Conduct)


3 42. Respondent has subjected his Physician's and Surgeon's Certificate No. A 37985 to  
4 disciplinary action under sections 2227 and 2234 of the Code, in that he has engaged in conduct  
5 which breaches the rules or ethical code of the medical profession, or conduct which is  
6 unbecoming to a member in good standing of the medical profession, and which demonstrates an  
7 unfitness to practice medicine, as more particularly alleged in paragraphs 9 through 41, above,  
8 which are hereby incorporated by reference and re-alleged as if fully set forth herein.

9 PRAYER

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

- 12 1. Revoking or suspending Physician's and Surgeon's Certificate No. A 37985, issued  
13 to Navin Saran, M.D.;
- 14 2. Revoking, suspending or denying approval of Respondent Navin Saran, M.D.'s  
15 authority to supervise physician assistants, pursuant to section 3527 of the Code, and advanced  
16 practice nurses;
- 17 3. Ordering Respondent Navin Saran, M.D., if placed on probation, to pay the Board the  
18 costs of probation monitoring; and
- 19 4. Taking such other and further action as deemed necessary and proper.

20  
21 DATED: October 16, 2019

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