

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

In the Matter of the Accusation
Against:

Katherine Anne O'Hanlan, M.D.

Physician's and Surgeon's
Certificate No. G70108

Respondent

Case No. 800-2017-036490

DECISION

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

This Decision shall become effective at 5:00 p.m. on March 15, 2021.

IT IS SO ORDERED March 8, 2021.

MEDICAL BOARD OF CALIFORNIA

By: 
William Prasifka
Executive Director

1 XAVIER BECERRA
Attorney General of California
2 JANE ZACK SIMON
Supervising Deputy Attorney General
3 LAWRENCE MERCER
Deputy Attorney General
4 State Bar No. 111898
455 Golden Gate Avenue, Suite 11000
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Attorneys for Complainant
7

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

12 In the Matter of the Accusation Against:

13 **KATHERINE ANNE O'HANLAN, M.D**
14 **40 Buckeye**
Portola Valley CA 94028

15 **Physician's and Surgeon's Certificate No. G**
16 **70108**

17 Respondent.

Case No. 800-2017-036490

OAH No. 2020100544

STIPULATED SURRENDER OF
LICENSE AND ORDER

18 In the interest of a prompt and speedy settlement of this matter, consistent with the public
19 interest and the responsibility of the Medical Board of California of the Department of Consumer
20 Affairs, the parties hereby agree to the following Stipulated Surrender and Disciplinary Order
21 which will be submitted to the Board for approval and adoption as the final disposition of the
22 Accusation.

23 **PARTIES**

24 1. William Prasifka (Complainant) is the Executive Director of the Medical Board of
25 California (Board). He brought this action solely in his official capacity and is represented in this
26 matter by Xavier Becerra, Attorney General of the State of California, by Lawrence Mercer,
27 Deputy Attorney General.
28

1 **CULPABILITY**

2 8. Respondent understands that the charges and allegations in Accusation No. 800-2017-
3 036490, if proven at a hearing, constitute cause for imposing discipline upon her Physician's and
4 Surgeon's Certificate.

5 9. For the purpose of resolving the Accusation without the expense and uncertainty of
6 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
7 basis for the charges in the Accusation and that those charges constitute cause for discipline.
8 Respondent believes that she could present evidence disputing the factual basis for the charges in
9 the Accusation, but she hereby gives up her right to contest that cause for discipline exists based
10 on those charges as she has retired from the practice of medicine.

11 10. Respondent understands that by signing this stipulation, she enables the Board to
12 issue an order accepting the surrender of her Physician's and Surgeon's Certificate without further
13 process.

14 **RESERVATION**

15 11. The admissions made by Respondent herein are only for the purposes of this
16 proceeding, or any other proceedings in which the Medical Board of California or other
17 professional licensing agency is involved, and shall not be admissible in any other criminal or
18 civil proceeding.

19 **CONTINGENCY**

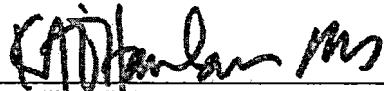
20 12. This stipulation shall be subject to approval by the Board. Respondent understands
21 and agrees that counsel for Complainant and the staff of the Board may communicate directly
22 with the Board regarding this stipulation and surrender, without notice to or participation by
23 Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that
24 she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board
25 considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order,
26 the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this
27 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not
28 be disqualified from further action by having considered this matter.

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ACCEPTANCE

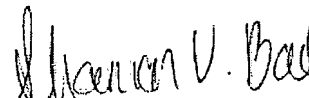
I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney, Shannon Baker. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: 02/24/2021


KATHERINE ANNE O'HANLAN, M.D.
Respondent

I have read and fully discussed with Respondent KATHERINE ANNE O'HANLAN, M.D the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: 2/24/2021


SHANNON BAKER
Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Medical Board of California of the Department of Consumer Affairs.

DATED: *February 26, 2021*

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
JANE ZACK SIMON
Supervising Deputy Attorney General



LAWRENCE MERCER
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 800-2017-036490

1 XAVIER BECERRA
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2 JANE ZACK-SIMON
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3 LAWRENCE MERCER
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8 **BEFORE THE**
9 **MEDICAL BOARD OF CALIFORNIA**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 800-2017-036490

13 **Katherine Anne O'Hanlan, M.D.**
14 **4370 Alpine Rd Ste. 103-104**
Portola Valley, CA 94028-7952

ACCUSATION

15 **Physician's and Surgeon's Certificate**
16 **No. G 70108,**

Respondent.

17
18 Complainant alleges:

19 **PARTIES**

- 20 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official
21 capacity as the Executive Director of the Medical Board of California, Department of Consumer
22 Affairs (Board).
- 23 2. On or about October 22, 1990, the Medical Board issued Physician's and Surgeon's
24 Certificate Number G 70108 to Katherine Anne O'Hanlan, M.D. (Respondent). Effective April
25 25, 2005, said certificate was revoked, the revocation stayed, and a three-year probation, with an
26 actual suspension for 30 days, was imposed. The Physician's and Surgeon's Certificate was in full
27 force and effect at all times relevant to the charges brought herein and will expire on February 29,
28 2020, unless renewed.

1 JURISDICTION

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

4 4. Section 2227 of the Code states:

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

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

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

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

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

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

18 “(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical
19 review or advisory conferences, professional competency examinations, continuing education
20 activities, and cost reimbursement associated therewith that are agreed to with the board and
21 successfully completed by the licensee, or other matters made confidential or privileged by
22 existing law, is deemed public, and shall be made available to the public by the board pursuant to
23 Section 803.1.”

24 5. Section 2234 of the Code, states:

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

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

3 “(b) Gross negligence.

4 “(c) Repeated negligent acts. To be repeated, there must be two or more negligent acts or
5 omissions. An initial negligent act or omission followed by a separate and distinct departure from
6 the applicable standard of care shall constitute repeated negligent acts.

7 “(1) An initial negligent diagnosis followed by an act or omission medically appropriate for
8 that negligent diagnosis of the patient shall constitute a single negligent act.

9 “(2) When the standard of care requires a change in the diagnosis, act, or omission that
10 constitutes the negligent act described in paragraph (1), including, but not limited to, a
11 reevaluation of the diagnosis or a change in treatment, and the licensee’s conduct departs from the
12 applicable standard of care, each departure constitutes a separate and distinct breach of the
13 standard of care.”

14 6. Section 2266 of the Code states: “The failure of a physician and surgeon to maintain
15 adequate and accurate records relating to the provision of services to their patients constitutes
16 unprofessional conduct.”

17 **FIRST CAUSE FOR DISCIPLINE**

18 **(Gross Negligence, Repeated Negligent Acts)**

19 7. Respondent Katherine Anne O’Hanlan, M.D. is subject to disciplinary action under
20 sections 2234 and/or 2234(b) and/or 2234(c) in that Respondent was grossly negligent and/or
21 engaged in repeated acts of negligence in her care and treatment of Patient 1.¹ The
22 circumstances are as follows:

23 8. On or about August 8, 2017, Respondent performed a pre-operative history and
24 physical for Patient 1. The patient was a 65-year old female with a history of a total abdominal
25 hysterectomy and lymph node dissection for endometrial cancer in 2014. The patient had
26 recurrent pain to the hip and back beginning in 2016. The patient had multiple imaging studies
27 and a cholecystectomy (gall bladder removal) until, in June 2017, a CT of the abdomen and pelvis

28 ¹ Patient names are redacted to protect privacy.

1 showed a mixed attenuation mass-like structure in the periaortic tissues. An MR Angiogram of
2 the abdomen showed an infrarenal periaortic mass. There was a subtle intimal contour irregularity
3 in the abdominal aorta over an area measuring 1 cm in width and 3.5 cm in length, which
4 appeared to be subjacent to the enlarged node. Respondent's plan was to perform a resection of
5 the mass.

6 9. After Respondent reviewed the films with another surgeon, her impression was that
7 the findings raised concern for invasion of the wall of the aorta. Anticipating that the aortic lymph
8 node dissection might involve the aorta, Respondent had a verbal consultation with a vascular
9 surgeon to ascertain his availability should his assistance be required. She also followed up by
10 text message to the vascular surgeon with the patient's medical record number to enable him to
11 review the patient's MR Angiogram films. She did not arrange for a formal consultation so that
12 the vascular surgeon would see, evaluate and obtain consent from the patient, nor did she
13 coordinate OR schedule with the vascular surgeon.

14 10. Also on August 8, 2017, Respondent obtained the patient's informed consent to a
15 "second-look open incision surgery with resection of aortic nodes," but, although she had a major
16 concern over the encroachment of the mass on the wall of the aorta, she did not obtain the
17 patient's informed consent to do the possible aortic repair or resection, and stated above, nor did
18 she arrange for the vascular surgeon to do so.

19 11. On August 9, 2017, Respondent undertook the planned second-look laparotomy for
20 tumor debulking, inframesenteric and infrarenal radical lymphadenectomy and suprarenal vein
21 lymph node dissection. During the procedure the nodes were seen on the aorta and, as these were
22 being dissected free, Respondent became aware that the muscularis had been invaded by the
23 tumor. Respondent continued with the dissection, but did not summon the vascular surgeon until
24 a hole was encountered in the aorta. During this time, the patient had significant blood loss. When
25 the vascular surgeon was summoned urgently, he was already scrubbed into another case and
26 there was a delay before he arrived and replaced a 6 cm segment of the aorta.

27 12. After finishing her procedure on Patient 1, Respondent proceeded to dictate two
28 operative summaries, one for her role in the procedure and another for the surgeon who assisted

1 her in the procedure. Her purpose was to support billing at a higher rate by the other surgeon.
2 Later the assistant surgeon advised that he did not require the additional designation as co-
3 surgeon and Respondent asked that the two operative reports, which in any case were inaccurate
4 in many respects, be deleted.

5 13. Respondent is guilty of unprofessional conduct and Respondent's certificate is subject
6 to discipline pursuant to Business and Professions Code sections 2234 and/or 2234(b) and/or
7 2234(c) based on her gross negligence and/or repeated negligent acts, including but not limited to:

- 8 A. Respondent failed to arrange for a formal vascular surgery consultation;
- 9 B. Respondent failed to obtain informed consent for aortic repair and resection;
- 10 C. Respondent failed to have the vascular surgeon either assisting in surgery or
11 immediately available to address anticipated complications in resecting around the
12 aorta;
- 13 D. Respondent improperly dictated an operative summary for another surgeon.

14 **SECOND CAUSE FOR DISCIPLINE**

15 **(Gross Negligence, Repeated Negligent Acts)**

16 14. Respondent Katherine Anne O'Hanlan, M.D. is subject to disciplinary action under
17 sections 2234 and/or 2234(b) and/or 2234(c) in that Respondent was grossly negligent and/or
18 engaged in repeated acts of negligence in her care and treatment of Patient 2. The circumstances
19 are as follows:

20 15. Patient 2 was a 42-year old woman who had undergone an ultrasound on August 17,
21 2016, which study revealed a large 10 cm complex ovarian mass. Of significance, preoperatively,
22 Patient 2 had hemoglobin (HGB) measured at 13 and hematocrit (HCT) of 36.5.

23 16. On September 13, 2016, Respondent performed a laparoscopic bilateral
24 salpingectomy and left oophorectomy. A laparoscopic appendectomy with partial resection of the
25 distal small bowel was performed by an assistant surgeon in the same operation. Once the
26 operation was completed, Respondent wrote same day discharge orders and transferred the patient
27 to the Post Anesthesia Care Unit (PACU). Estimated blood loss (EBL) for the procedure was 50
28 cc.

1 17. Postoperatively Patient 2 initially did well, but after a couple of hours she
2 experienced a few hypotensive episodes and, several hours later, she became near syncopal when
3 she attempted to sit up. A stat complete blood count showed a very low HCT of 23.7 and HGB of
4 7.9. Given the small EBL and the marked drop from preoperative HCT and HGB levels,
5 Respondent suspected an internal bleed and the patient was taken back to the OR at
6 approximately 10:30 p.m. on the same day.

7 18. At the re-operation, Respondent performed a laparoscopic evacuation of a pelvic
8 hematoma, removing approximately 650 cc of clotted blood, but could find no definitive site for
9 bleeding. Patient 2 was transfused and post-operative HCT came back at 34.9. The patient
10 appeared to do well after the second procedure and Respondent, feeling reassured that there were
11 no active bleeding sites, did not order serial vitals and serial HCT and HGB tests to monitor the
12 patient's condition over night. Although she did not document it in a progress note, Respondent
13 later reported that she did see the patient the following morning and felt that she was okay for
14 discharge.

15 19. Patient 2 was discharged on the morning of September 14, 2016; however, within an
16 hour Patient 2's husband contacted Respondent and stated that his wife was not doing well on
17 their long drive home. According to Patient 2's husband, Respondent stated that the patient might
18 be having a panic attack and no action was warranted. Within a couple of more hours of travel,
19 however, Patient 2 had a bloody bowel movement and Respondent was called again. At that time,
20 she advised the couple to return to the hospital.

21 20. When Patient 2 returned to the hospital, she was pale, diaphoretic and clearly anemic.
22 An abdominal CT was performed which indicated a suspected small focus of active hemorrhage
23 in the right lower quadrant adjacent to the small bowel loop and to the surgical clips placed in the
24 initial surgery. Her HCT was 23.7 and her HGB was 7.9. Respondent took the patient back to the
25 OR where a laparoscopic evacuation of the hematoma and small bowel resection with primary
26 anastomosis was performed. After three surgeries in four days, the patient was kept in the hospital
27 until September 17, when she was discharged.

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1 21. In a subsequent interview, Respondent acknowledged that she did not order serial
2 HCT and HGB tests and that she would do so in all similar future cases.

3 22. Respondent is guilty of unprofessional conduct and Respondent's certificate is subject
4 to discipline pursuant to Business and Professions Code sections 2234 and/or 2234(b) and/or
5 2234(c) based on her gross negligence and/or repeated negligent acts, including but not limited to:

6 A. Respondent failed to closely monitor the patient by ordering serial vital signs, HCT and
7 HGB tests;

8 B. Respondent failed to document that she had seen the patient on the morning of
9 discharge on September 14, 2016 and determined that the patient was ready for
10 discharge.

11 **THIRD CAUSE FOR DISCIPLINE**

12 **(Gross Negligence, Repeated Negligent Acts)**

13 23. Respondent Katherine Anne O'Hanlan, M.D. is subject to disciplinary action under
14 sections 2234 and/or 2234(b) and/or 2234(c) in that Respondent was grossly negligent and/or
15 engaged in repeated acts of negligence in her care and treatment of Patient 3. The circumstances
16 are as follows:

17 24. Patient 3, a 41-year old female, had undergone a pelvic ultrasound which revealed an
18 11 cm x 9 cm uterine fibroid. On February 17, 2017, Respondent saw the patient for a
19 preoperative history and physical. At that time the patient was consented for a laparoscopic
20 hysterectomy with bilateral salpingectomy and incidental appendectomy. After discussion with
21 the patient, Respondent wrote: "We will save the ovaries." However, in error, she scheduled the
22 procedure with the hospital's OR scheduler as a laparoscopic hysterectomy and bilateral salpingo-
23 oophorectomy.

24 25. On February 18, 2017, Patient 3 was brought to the OR. Prior to the incision, a
25 surgical pause was performed by the surgical team and lead by Respondent. She stated from
26 memory that the procedure to be performed was a laparoscopic hysterectomy and bilateral
27 salpingo-oophorectomy, which was erroneous. Because she believed that she recalled the
28 procedure accurately, she did not consult the preoperative history and physical or the signed

1 consent to verify the procedure that the patient had consented to. As stated above, the surgery had
2 also been incorrectly scheduled as such, and OR nursing staff did not correct Respondent's error.
3 The surgical pause, which is one step in a mandated safety checklist procedure, is lead by the
4 circulating nurse. By leading the surgical pause herself, Respondent eliminated the possible
5 detection of her error by the circulating nurse.

6 26. On February 19, 2017, Respondent visited Patient 3 on her postsurgical rounds and
7 advised her that the surgery had gone very well and that Respondent had removed her uterus,
8 tubes, ovaries, and appendix, with a minimum of blood loss. Thereupon, Patient 3 reminded
9 Respondent they had agreed to save the ovaries. Respondent confirmed that there had been a
10 wrong-procedure error and so advised the patient. In a subsequent interview, Respondent stated
11 that she now conducts the surgical pause by reading directly from the surgical consent form.

12 27. Respondent is guilty of unprofessional conduct and Respondent's certificate is subject
13 to discipline pursuant to Business and Professions Code sections 2234 and/or 2234(b) and/or
14 2234(c) based on her gross negligence and/or repeated negligent acts, including but not limited to:

- 15 A. Respondent failed to check the preoperative history and physical and/or signed consent
16 form to verify the procedure to be performed;
17 B. Respondent failed to properly perform the perioperative surgical safety check.

18 **FOURTH CAUSE FOR DISCIPLINE**

19 **(Gross Negligence, Repeated Negligent Acts)**

20 28. Respondent Katherine Anne O'Hanlan, M.D. is subject to disciplinary action under
21 sections 2234 and/or 2234(b) and/or 2234(c) in that Respondent was grossly negligent and/or
22 engaged in repeated acts of negligence in her care and treatment of Patient 4. The circumstances
23 are as follows:

24 29. Patient 4, a 64-year old female, had developed irregular bleeding and had an
25 endometrial biopsy on December 14, 2015, that showed a grade 1 to 2 endometrial
26 adenocarcinoma. She was evaluated by Respondent on January 13, 2016, for endometrioid
27 adenocarcinoma of the uterus and uterovaginal prolapse. Respondent noted a normal HCT of 43
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1 and HGB of 14. Respondent's plan was a total laparoscopic hysterectomy with bilateral salpingo-
2 oophorectomy and appendectomy, and the patient was consented for this procedure.

3 30. On January 14, 2016, Respondent and an assistant surgeon performed a total
4 laparoscopic hysterectomy, bilateral salpingo-oophorectomy, appendectomy and uterosacral
5 ligament colpoplexy. The EBL was 300 cc and Respondent reported good hemostasis, especially
6 at the uterine artery incision sites.

7 31. The patient initially did well postoperatively, but in the early morning hours she had a
8 brief episode of hypotension and emesis. Respondent was notified by nursing staff and requested
9 a Rapid Response Team (RRT) be called to evaluate the patient and to get a stat CBC. The RRT
10 recommended waiting for the test results and bedrest until Respondent could see the patient. At
11 approximately 3 A.M., the patient had another hypotensive episode. Nursing staff informed
12 Respondent of all these events and also advised her at 5 A.M. that the HCT had come back at
13 27.4 and HGB at 8.9. Although she did not document it in a progress note, Respondent saw the
14 patient at approximately 7 A.M. and her impression was that the patient was doing well. She did
15 not order serial HCT and HGB tests, nor did she keep the patient in the hospital for observation.

16 32. Patient 4 returned through the Emergency Department (ED) on January 16, 2016,
17 after a syncope episode. In the ED, she was described as pale with a diffusely tender abdomen.
18 Her HCT was measured at 16.7. A CT of the abdomen/pelvis showed a large amount of
19 heterogeneous, slightly hyperdense fluid in the pelvis, consistent with
20 hemoperitoneum/hematoma. Respondent was advised and admitted the patient to the hospital. At
21 a subsequent surgery, Respondent laparoscopically evacuated 750 cc of clot.

22 33. In a later interview, Respondent stated that she was falsely reassured by the patient's
23 appearance when she saw her the morning following the date of her surgery. She acknowledged
24 that she should have had a higher index of suspicion for a post-operative bleed and kept the
25 patient for monitoring and serial HCT and HGB tests. Respondent stated that she now orders
26 serial HCT and HGB tests.

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1 34. Respondent is guilty of unprofessional conduct and Respondent's certificate is subject
2 to discipline pursuant to Business and Professions Code sections 2234 and/or 2234(b) and/or
3 2234(c) based on her gross negligence and/or repeated negligent acts, including but not limited to:

4 A. Respondent failed to have a high index of suspicion for an intra-abdominal bleed, failed
5 to see the patient at the time that she was showing signs and symptoms consistent with a
6 bleed and failed to order serial HCT and HGB tests;

7 B. When Respondent did see the patient later in the morning, she failed to write a progress
8 note documenting the encounter.

9 **FIFTH CAUSE FOR DISCIPLINE**

10 **(Inadequate and Inaccurate Records)**

11 35. Respondent Katherine Anne O'Hanlan, M.D. is subject to disciplinary action under
12 section 2266 in that she failed to maintain adequate and accurate records, including:

13 A. Respondent improperly dictated an operative report for another surgeon;

14 B. Respondent failed to document her encounter with Patient 2, as set forth above;

15 C. Respondent failed to document her encounter with Patient 4, as set forth above.

16 **DISCIPLINARY CONSIDERATIONS**

17 36. To determine the degree of discipline, if any, to be imposed on Respondent,
18 Katherine Anne O'Hanlan, M.D., Complainant alleges that on or about April 25, 2005, in a prior
19 disciplinary action entitled "In the Matter of the Accusation Against Katherine Anne O'Hanlan,
20 M.D." before the Medical Board of California, in Case Number 03-2003-142292, Respondent's
21 license was revoked, the revocation stayed, and a three-year probation, with an actual suspension
22 for 30 days, was imposed. That decision is now final and is incorporated by reference as if fully
23 set forth herein.

24 **PRAYER**

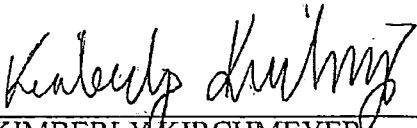
25 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
26 and that following the hearing, the Medical Board of California issue a decision:

27 1. Revoking or suspending Physician's and Surgeon's Certificate Number G 70108,
28 issued to Respondent;

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- 2. Revoking, suspending or denying approval of Respondent's authority to supervise physician assistants and advanced practice nurses;
- 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: March 25, 2019


KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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