

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

In the Matter of the Accusation Against:

Jennifer Geneva Brown, M.D.

**Physician's & Surgeon's
Certificate No. C 157801**

Case No. 800-2021-082934

Respondent.

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 May 2, 2025.

IT IS SO ORDERED: April 4, 2025.

MEDICAL BOARD OF CALIFORNIA

Michelle A. Bholat, MD
**Michelle Anne Bholat, M.D., Chair
Panel A**

1 ROB BONTA
Attorney General of California
2 MICHAEL C. BRUMMEL
Supervising Deputy Attorney General
3 JANNSEN TAN
Deputy Attorney General
4 State Bar No. 237826
1300 I Street, Suite 125
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Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

12 **JENNIFER GENEVA BROWN, M.D.**
13 **1606 Fawnvalley Dr.**
Des Peres, MO 63131-3920

14 **Physician's and Surgeon's Certificate**
15 **No. C 157801**

16 Respondent.

Case No. 800-2021-082934

OAH No. 2024070155

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

17
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 Settlement 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. Reji Varghese (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 Rob Bonta, Attorney General of the State of California, by Jannsen Tan, Deputy
27 Attorney General.
28

2. Respondent Jennifer Geneva Brown, M.D. (Respondent) is represented in this proceeding by attorney Benjamin J. Fenton, whose address is: 1990 S. Bundy Drive, Suite 777 Los Angeles, CA 90025.

3. On or about August 8, 2018, the Board issued Physician's and Surgeon's Certificate No. C 157801 to Jennifer Geneva Brown, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2021-082934, and will expire on August 31, 2026, unless renewed.

JURISDICTION

4. Accusation No. 800-2021-082934 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on March 7, 2024. Respondent timely filed her Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 800-2021-082934 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2021-082934. Respondent has also carefully read, fully discussed with her counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her 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.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

1 **CULPABILITY**

2 9. Respondent understands and agrees that the charges and allegations in Accusation
3 No. 800-2021-082934, if proven at a hearing, constitute cause for imposing discipline upon her
4 Physician's and Surgeon's Certificate.

5 10. Respondent does not contest that, at an administrative hearing, complainant could
6 establish a prima facie case with respect to the charges and allegations in Accusation No. 800-
7 2021-082934, a true and correct copy of which is attached hereto as Exhibit A, and that he has
8 thereby subjected her Physician's and Surgeon's Certificate, No. C 157801 to disciplinary action.

9 11. Respondent agrees that her Physician's and Surgeon's Certificate is subject to
10 discipline and agrees to be bound by the Board's imposition of discipline as set forth in the
11 Disciplinary Order below.

12 **RESERVATION**

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

17 **CONTINGENCY**

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

14. 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 agreement of the parties in this above entitled matter.

15. 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.

16. 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

A. PUBLIC REPRIMAND.

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. C 157801 issued to Respondent Jennifer Geneva Brown, M.D. is Publicly Reprimanded pursuant to California Business and Professions Code section 2227, subdivision (a)(4). This Public Reprimand, which is issued in connection with Respondent's care and treatment of Patient A, as set forth in Accusation No. 800-2021-082934, is as follows:

You committed acts constituting negligence in violation of Business and Professions Code section 2234, subdivision (c), in that you (1) failed to document an assessment of the severity of Patient A's pancreatitis on admission, (2) failed to evaluate and treat Patient A's acidemia and severe metabolic acidosis, and (3) failed to admit Patient A to the ICU as indicated, as set as set forth in Accusation No. 800-2021-082934.

B. EDUCATION COURSE. Within sixty (60) calendar days of the effective date of this Decision, Respondent shall submit to the Board or its designee for its prior approval educational program(s) or course(s) which shall not be less than forty (40) hours in addition to the twenty-five (25) hours for renewal. The educational program(s) or course(s) shall be aimed at correcting any areas of deficient practice or knowledge and shall be Category I certified. The educational program(s) or course(s) shall be at Respondent's expense and shall be in addition to

1 the Continuing Medical Education ("CME") requirements for renewal of licensure. Following
2 the completion of each course, the Board or its designee may administer an examination to test
3 Respondent's knowledge of the course. Respondent shall provide proof of attendance for sixty-
4 five (65) hours of CME in satisfaction of this condition.

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

9 If Respondent fails to enroll, participate in, or successfully complete the educational
10 program(s) or course(s) within the designated time period, Respondent shall receive a notification
11 from the Board or its designee to cease the practice of medicine within three (3) calendar days
12 after being so notified. Respondent shall not resume the practice of medicine until enrollment or
13 participation in the educational program(s) or course(s) has been completed. Failure to
14 successfully complete the educational program(s) or course(s) outlined above shall constitute
15 unprofessional conduct and is grounds for further disciplinary action.

16 **C. MEDICAL RECORD KEEPING COURSE**

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

27 A medical record keeping course taken after the acts that gave rise to the charges in the
28 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board

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

4 Respondent shall submit a certification of successful completion to the Board or its
5 designee not later than 15 calendar days after successfully completing the course, or not later than
6 15 calendar days after the effective date of the Decision, whichever is later. Failure to provide
7 proof of successful completion to the Board or its designee within twelve (12) months of the
8 effective date of this Decision, unless the Board or its designee agrees in writing to an extension
9 of that time, shall constitute general unprofessional conduct and may serve as the grounds for
10 further disciplinary action.

11 **D. INVESTIGATION/ENFORCEMENT COST RECOVERY.** Respondent is hereby
12 ordered to reimburse the Board its costs of investigation and enforcement, in the amount of \$
13 33,955.80 (thirty-three thousand nine hundred fifty-five dollars and eighty cents), payable within
14 sixty (60) calendar days of the effective date of this Decision. Costs shall be payable to the
15 Medical Board of California. Failure to pay such costs shall constitute unprofessional conduct and
16 is grounds for further disciplinary action.

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

19 The filing of bankruptcy by Respondent shall not relieve her of the responsibility to repay
20 investigation and enforcement costs.

21 **E. FUTURE ADMISSIONS CLAUSE.** If Respondent should ever apply or reapply
22 for a new license or certification, or petition for reinstatement of a license, by any other health
23 care licensing action agency in the State of California, all of the charges and allegations contained
24 in Accusation No. 800-2021-082934 shall be deemed to be true, correct, and admitted by
25 Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or
26 restrict license.

1 ACCEPTANCE

2 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
3 discussed it with my attorney, Benjamin J. Fenton. I understand the stipulation and the effect it
4 will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and
5 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
6 Decision and Order of the Medical Board of California.

7
8 DATED: _____

JENNIFER GENEVA BROWN, M.D.
Respondent

10 I have read and fully discussed with Respondent Jennifer Geneva Brown, M.D. the terms
11 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
12 Order. I approve its form and content.

13
14 DATED: _____

BENJAMIN J. FENTON
Attorney for Respondent

15
16
17 ENDORSEMENT

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

20 DATED: 3/14/2025
21 _____

Respectfully submitted,

22 ROB BONTA
Attorney General of California
23 MICHAEL C. BRUMMEL
Supervising Deputy Attorney General

24 *Jannsen Tan*

25 JANNSEN TAN
26 Deputy Attorney General
Attorneys for Complainant

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1 ACCEPTANCE

2 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
3 discussed it with my attorney, Benjamin J. Fenton. I understand the stipulation and the effect it
4 will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and
5 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
6 Decision and Order of the Medical Board of California

7
8 DATED: 3/10/2025


9 JENNIFER GENEVA BROWN, M.D.
Respondent

10 I have read and fully discussed with Respondent Jennifer Geneva Brown, M.D. the terms
11 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
12 Order. I approve its form and content.

13
14 DATED: 3/11/25


15 BENJAMIN J. FENTON
Attorney for Respondent

16
17 ENDORSEMENT

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

20
21 DATED: _____

Respectfully submitted,

22 ROB BONTA
Attorney General of California
23 MICHAEL C. BRUMMEL
Supervising Deputy Attorney General

24
25 JANNSEN TAN
Deputy Attorney General
26 Attorneys for Complainant

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1 ROB BONTA
Attorney General of California
2 MICHAEL C. BRUMMEL
Supervising Deputy Attorney General
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7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

Case No. 800-2021-082934

13 **Jennifer Geneva Brown, M.D.**
14 **11560 Paskenta Rd.**
Red Bluff, CA 96080-7764

A C C U S A T I O N

15 **Physician's and Surgeon's Certificate**
16 **No. C 157801,**

17 Respondent.

18
19
20 **PARTIES**

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

24 2. On or about August 8, 2018, the Medical Board issued Physician's and Surgeon's
25 Certificate No. C 157801 to Jennifer Geneva Brown, M.D. (Respondent). The Physician's and
26 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
27 herein and will expire on August 31, 2024, unless renewed.

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4. Section 2227 of the Code states:

(1) Have his or her license revoked 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.

(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.

STATUTORY PROVISIONS

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:

(b) Gross negligence.

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

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

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

13 (d) Incompetence.

14 (e) The commission of any act involving dishonesty or corruption that is
15 substantially related to the qualifications, functions, or duties of a physician and
16 surgeon.

17 (f) Any action or conduct that would have warranted the denial of a certificate.

18 (g) The failure by a certificate holder, in the absence of good cause, to attend
19 and participate in an interview by the board. This subdivision shall only apply to a
20 certificate holder who is the subject of an investigation by the board.

21 6. Section 2266 of the Code states: The failure of a physician and surgeon to maintain
22 adequate and accurate records relating to the provision of services to their patients constitutes
23 unprofessional conduct.

24 COST RECOVERY

25 7. Section 125.3 of the Code states:

26 (a) Except as otherwise provided by law, in any order issued in resolution of a
27 disciplinary proceeding before any board within the department or before the
28 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 licensee 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.

1 (d) The administrative law judge shall make a proposed finding of the amount
2 of reasonable costs of investigation and prosecution of the case when requested
3 pursuant to subdivision (a). The finding of the administrative law judge with regard to
4 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).

5 (e) If an order for recovery of costs is made and timely payment is not made as
6 directed in the board's decision, the board may enforce the order for repayment in any
7 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.

8 (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.

9 (g) (1) Except as provided in paragraph (2), the board shall not renew or
10 reinstate the license of any licensee who has failed to pay all of the costs ordered
under this section.

11 (2) Notwithstanding paragraph (1), the board may, in its discretion,
12 conditionally renew or reinstate for a maximum of one year the license of any
13 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.

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

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

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

20 FACTUAL ALLEGATIONS

21 8. Respondent is a physician and surgeon, who at all times alleged herein worked at
22 Shasta Regional Medical Center.

23 9. On or about February 4, 2021, Patient A¹ presented at the Shasta Emergency
24 Department. Patient A was, at the time of the visit, a 42-year-old female with a history of alcohol
25 disorder. Patient A presented with abdominal pain, body aches, nausea, and vomiting that started
26 at 4:00 p.m. the day before. CT scan revealed bowel inflammation, gallstones, an enlarged

27 _____
28 ¹ Patient and provider names have been redacted to protect their privacy and shall be
disclosed during discovery.

1 gallbladder, and pancreatic inflammation. Labs were significant for leukocytosis (elevated white
2 blood cell count), acute kidney injury, acute liver injury, severe lipase elevation (denoting
3 pancreatic inflammation), and severe lactic acidosis (lactate 10.4), among other abnormalities.
4 Patient A also had an elevated respiratory rate and pulse.

5 10. On or about February 5, 2021, at or around 12:10 a.m., Respondent was paged and
6 saw Patient A. Respondent's notes indicate that Patient A was "ill appearing," with
7 "tachycardia", and her abdominal examination was notable for "tenderness, guarding and
8 decreased bowel sounds." Respondent noted that Patient A had no respiratory distress and was
9 alert and oriented. Respondent failed to document an assessment of the severity of Patient A's
10 acute pancreatitis. Respondent failed to document the presence of organ failure or dysfunction or
11 relate these to the determination of severity of pancreatitis. Respondent failed to document the
12 evaluation of Patient A's arterial pH despite her severely elevated lactic acid and severely low
13 bicarbonate (severe metabolic acidosis.) Respondent failed to document ordering a blood gas or
14 administering bicarbonate therapy. Patient A was admitted to the medical/surgical unit with the
15 diagnoses of (1) choledocholithiasis (stones in the bile duct) with acute cholecystitis (infection of
16 the gallbladder); (2) pancreatitis; and (3) acute kidney injury. Respondent documented her plan
17 as (1) "With elevated LFTs and tbili, CBD 9mm per CT abd/pelvis. GI to consult in the AM" (2)
18 NPO (nothing by mouth), IV fluids, and PRN (as-needed pain medications) and (3) monitoring
19 labs with IVF. Respondent also documented "PPx:SCDs for DVT ppx. Encourage early
20 ambulation." Respondent's assessment and plan did not document the presence of sepsis or the
21 presence of severe lactic acidosis and failed to document a plan for how they would be addressed.
22 Respondent failed to document a complete sepsis evaluation, whether blood cultures were
23 obtained, or the plan for antibiotics once the patient was admitted. Respondent failed to perform
24 an adequate evaluation or treatment for acidemia in Patient A, who had severe metabolic acidosis.

25 11. Patient A was transferred to the medical surgical ward at or around 2:45 a.m. At or
26 around 6:30-6:55 a.m., Patient A suffered an unwitnessed fall in her room. When Patient A was
27 discovered, she was unresponsive and on the ground. A Rapid Response Team (RRT) was called
28

1 at or around 6:55 a.m., and the RRT arrived at 6:57 a.m. Patient A was found to be unresponsive,
2 tachycardic, and hypotensive.

3 12. During the Rapid Response, multiple attempts were made to reach Respondent, but
4 they were all unsuccessful. A hospitalist-wide group page was subsequently sent, and Dr. M, the
5 oncoming day hospitalist, noted that he received his first page at 7:09-7:10 a.m., called the
6 nursing unit by 7:15 a.m. and took over care, and by 7:25 a.m. he had requested patient transfer to
7 the ICU, where care was taken over by an intensivist.

8 13. Patient A was transferred to the ICU, was started on vasopressors, and underwent
9 endotracheal intubation. The gastroenterologist was consulted. Bedside ERCP (camera
10 procedure of the biliary tree) was unsuccessful due to severe intestinal inflammation. Despite
11 maximal medical therapy in the ICU, Patient A developed Acute Respiratory Distress Syndrome,
12 worsening kidney failure and worsening shock with rising lactic acidosis. The ICU physician,
13 who recommended that Patient A be transitioned to comfort care, held a discussion with Patient
14 A's family. The family agreed with this recommendation. Patient A was extubated and expired
15 shortly thereafter.

16 FIRST CAUSE FOR DISCIPLINE

17 (Repeated Negligent Acts)

18 14. Respondent, Jennifer G. Brown, M.D., has subjected her Physician's and Surgeon's
19 Certificate No. C 157801 to disciplinary action under section 2227, as defined by section 2234,
20 subdivisions (c), of the Code, in that Respondent committed repeated acts of negligence in her
21 care and treatment of Patient A, as more particularly alleged hereinafter. Paragraphs 8 through
22 13, above, are hereby incorporated by reference and realleged as if fully set forth herein.

23 A. Respondent failed to document an assessment of the severity of pancreatitis;

24 B. Respondent failed to document her decision-making regarding admission to the
25 medical surgical ward rather than the Intensive Care Unit;

26 C. Respondent failed to admit Patient A to the ICU;

27 D. Respondent failed to document her assessment and plan for Patient A's sepsis and
28 severe lactic acidosis;

1 E. Respondent failed to evaluate and treat Patient A's acidemia and severe metabolic
2 acidosis.

3 **SECOND CAUSE FOR DISCIPLINE**

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

5 15. Respondent, Jennifer G. Brown, M.D., has subjected her Physician's and Surgeon's
6 Certificate No. C 157801 to disciplinary action under section 2227, as defined by section 2266, of
7 the Code, in that Respondent failed to maintain adequate and accurate medical records in the care
8 and treatment of Patient A, as more particularly alleged in Paragraphs 8 through 14, above, which
9 are hereby incorporated by reference and realleged as if fully set forth herein.

10 **PRAYER**

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

13 1. Revoking or suspending Physician's and Surgeon's Certificate Number C 157801,
14 issued to Respondent, Jennifer Geneva Brown, M.D.;

15 2. Revoking, suspending or denying approval of Respondent, Jennifer Geneva Brown,
16 M.D.'s authority to supervise physician assistants and advanced practice nurses;

17 3. Ordering Respondent, Jennifer Geneva Brown, M.D., to pay the Board the costs of
18 the investigation and enforcement of this case, and if placed on probation, the costs of probation
19 monitoring; and

20 5. Taking such other and further action as deemed necessary and proper.

21 DATED: 3/7/2024

22 
REJI VARGHESE
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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