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

10 In the Matter of the Accusation Against:

11 **BRETT QUENTIN WOLFF**
12 **1919 Manhattan Ave. # 4**
East Palo Alto, CA 94303

Case No. 5572

13 **Pharmacist License No. RPH 72470**

14 **and**

15 **WALGREENS PHARMACY #02126**
16 **1414 El Camino Real**
San Carlos, CA 94070

Case No. 5928

17 **Original Pharmacy Permit No. PHY 52845**

ACCUSATION

18 Respondents.

19 Complainant alleges:

20 PARTIES

- 21 1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity
22 as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.
- 23 2. On or about March 19, 2015, the Board of Pharmacy issued Pharmacist License
24 Number RPH 72470 to Brett Quentin Wolff (Respondent Wolff). The Pharmacist License was in
25 full force and effect at all times relevant to the charges brought herein. It expired on or about
26 October 31, 2016, and has not been renewed. On or about September 8, 2015, Respondent Wolff
27 was prohibited from practicing as a pharmacist pending the outcome of criminal proceedings in
28 *People v. Brett Quentin Wolff*, Case No. B1580229 in Santa Clara County Superior Court.

1 (h) The administering to oneself, of any controlled substance, or the use of any dangerous
2 drug or of alcoholic beverages to the extent or in a manner as to be dangerous or injurious to
3 oneself, to a person holding a license under this chapter, or to any other person or to the public, or
4 to the extent that the use impairs the ability of the person to conduct with safety to the public the
5 practice authorized by the license.

6 (j) The violation of any of the statutes of this state, of any other state, or of the United States
7 regulating controlled substances and dangerous drugs.

8 (l) The conviction of a crime substantially related to the qualifications, functions, and duties
9 of a licensee under this chapter. . . .

10 (o) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the
11 violation of or conspiring to violate any provision or term of this chapter or of the applicable
12 federal and state laws and regulations governing pharmacy, including regulations established by
13 the board or by any other state or federal regulatory agency.

14 9. Section 4059 of the Code, in pertinent part, prohibits furnishing of any dangerous
15 drug or dangerous device except upon the prescription of an authorized prescriber.

16 10. Section 4060 of the Code provides, in pertinent part, that no person shall possess any
17 controlled substance, except that furnished upon a valid prescription/drug order.

18 11. Health and Safety Code section 11170 provides that no person shall prescribe,
19 administer, or furnish a controlled substance for himself or herself.

20 12. Health and Safety Code section 11173, subdivision (a), provides that no person shall
21 obtain or attempt to obtain controlled substances, or procure or attempt to procure the
22 administration of or prescription for controlled substances, (1) by fraud, deceit, misrepresentation,
23 or subterfuge; or (2) by the concealment of a material fact.

24 13. Health and Safety Code section 11350, in pertinent part, makes it unlawful to possess
25 any controlled substance listed in Schedule II (Health and Safety Code section 11055),
26 subdivision (b) or (c), or any narcotic drug in Schedules III-V, absent a valid prescription.

27 14. Health and Safety Code section 11351, in pertinent part, makes it unlawful to possess
28 for sale or purchase for sale any narcotic controlled substance in Schedules II-IV.

1 15. Health and Safety Code section 11352, in pertinent part, makes it transport, import,
2 sell, furnish, administer, or give away, or offer to transport, import, sell, furnish, administer, or
3 give away, any controlled substance listed in Schedule II (Health and Safety Code section 11055),
4 subdivision (b) or (c), or any narcotic drug in Schedules III-V, absent a valid prescription.

5 16. Health and Safety Code section 11377, in pertinent part, makes it unlawful to possess
6 any non-narcotic drug in Schedules III-V, absent a valid prescription.

7 17. Section 4081 of the Code provides, in pertinent part, that every pharmacy shall keep a
8 current inventory of all dangerous drugs and dangerous devices, and that the owner, officer, and
9 partner of a pharmacy shall be jointly responsible with the pharmacist in charge for maintaining
10 the inventory of dangerous drugs and dangerous devices.

11 18. Section 4113, subdivision (c) of the Code states:

12 “The pharmacist-in-charge shall be responsible for a pharmacy's compliance with all state
13 and federal laws and regulations pertaining to the practice of pharmacy.”

14 19. California Code of Regulations, title 16, section 1714, subdivision (b) provides that
15 each pharmacy licensed by the board shall maintain its facilities, space, fixtures, and equipment so
16 that drugs are safely and properly prepared, maintained, secured and distributed.

17 20. California Code of Regulations, title 16, section 1718, defines “current inventory” as
18 used in sections 4081 and 4332 to include complete accountability for all dangerous drugs
19 handled by every licensee enumerated in sections 4081 and 4332. It further requires that the
20 controlled substances inventories required by the Title 21, Code of Federal Regulations, section
21 1304, shall be available for inspection upon request for at least 3 years.

22 21. California Code of Regulations, title 16, section 1770, states:

23 “For the purpose of denial, suspension, or revocation of a personal or facility license
24 pursuant to Division 1.5 (commencing with Section 475) of the Business and Professions Code, a
25 crime or act shall be considered substantially related to the qualifications, functions or duties of a
26 licensee or registrant if to a substantial degree it evidences present or potential unfitness of a
27 licensee or registrant to perform the functions authorized by her license or registration in a manner
28 consistent with the public health, safety, or welfare.”

1 22. Title 21, Code of Federal Regulations, section 1304.11, subdivision (c) requires that
2 any registrant of the DEA take a new inventory of all stocks of controlled substances on hand at
3 least every two years, on any date within two years of the previous biennial inventory date.

4 COST RECOVERY

5 23. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
6 administrative law judge to direct a licentiate found to have committed a violation of the licensing
7 act to pay a sum not to exceed its reasonable costs of investigation and enforcement.

8 CONTROLLED SUBSTANCES / DANGEROUS DRUGS

9 24. Section 4021 of the Code states:

10 “Controlled substance’ means any substance listed in Chapter 2 (commencing with Section
11 11053) of Division 10 of the Health and Safety Code.”

12 25. Section 4022 of the Code states, in pertinent part:

13 “Dangerous drug’ or ‘dangerous device’ means any drug or device unsafe for self use,
14 except veterinary drugs that are labeled as such, and includes the following:

15 “(a) Any drug that bears the legend: ‘Caution: federal law prohibits dispensing without
16 prescription,’ ‘Rx only,’ or words of similar import.

17 “(c) Any other drug or device that by federal or state law can be lawfully dispensed only on
18 prescription or furnished pursuant to Section 4006.”

19 26. **Adderall** and **Dexedrine** are brand names for amphetamine and dextroamphetamine
20 sulfate, a Schedule II controlled substance as designated by Health and Safety Code section
21 11055(d)(1) and a dangerous drug as designated by Business and Professions Code section 4022.
22 These are stimulant drugs that may be prescribed for treatment of ADHD.

23 27. **Vyvanse** is a brand name for lisdexamfetamine, a Schedule II controlled substance as
24 designated by Health and Safety Code section 11055(d)(1) and a dangerous drug as designated by
25 Business and Professions Code section 4022. This is a stimulant drug.

26 28. **Focalin XR** is a brand name for dexmethylphenidate, a Schedule II controlled
27 substance as designated by Health and Safety Code section 11055(d)(1) and a dangerous drug as
28 designated by Business and Professions Code section 4022. This is a stimulant drug.

1 29. **Concerta** and **Ritalin** are brand names for methylphenidate, a Schedule II controlled
2 substance as designated by Health and Safety Code section 11055(d)(1) and a dangerous drug as
3 designated by Business and Professions Code section 4022. This is a stimulant drug.

4 30. **OxyContin** and **Roxicodone** are brand names for oxycodone hydrochloride, a
5 Schedule II controlled substance as designated by Health and Safety Code section 11055(b) and a
6 dangerous drug as designated by Business and Professions Code section 4022. It is a narcotic.

7 31. **Endocet**, **Percocet**, and **Roxicet** are among the brand names for compounds of
8 varying dosages of acetaminophen (aka APAP) and oxycodone, a Schedule II controlled
9 substance as designated by Health and Safety Code section 11055(b)(1)(n) and a dangerous drug
10 as designated by Business and Professions Code section 4022. These are narcotic drugs.

11 32. **Dilaudid** is a brand name for hydromorphone hydrochloride, a Schedule II controlled
12 substance as designated by Health and Safety Code section 11055(b) and a dangerous drug as
13 designated by Business and Professions Code section 4022. It is a narcotic.

14 33. **Roxanol** is a brand name for morphine sulfate, a Schedule II controlled substance as
15 designated by Health and Safety Code section 11055(b) and a dangerous drug as designated by
16 Business and Professions Code section 4022. It is a narcotic.

17 34. **Duragesic** is a brand name for fentanyl, a Schedule II controlled substance as
18 designated by Health and Safety Code section 11055(c) and a dangerous drug as designated by
19 Business and Professions Code section 4022. It is a narcotic.

20 35. **Norco**, **Vicodin**, **Vicodin ES**, **Lortab**, and **Lorcet** are among the brand names for
21 compounds of varying dosages of acetaminophen (aka APAP) and **hydrocodone**, a Schedule III
22 controlled substance as designated by Health and Safety Code section 11056(e)(4) and dangerous
23 drug as designated by Business and Professions Code section 4022. The varying compounds are
24 also known generically as **Hydrocodone with APAP**. These are all narcotic drugs. Products like
25 these that combine **hydrocodone** with non-controlled substances are also called **hydrocodone**
26 **combination products**. Effective October 6, 2014, **hydrocodone combination productions**
27 were switched at the federal level from Schedule III (21 C.F.R. § 1308.13(e)(1)(iii) and (iv)) to
28 Schedule II (21 C.F.R. § 1308.12(b)(1)). This includes **Hydrocodone with APAP** drugs.

1 36. **Viagra** is a brand name for sildenafil, a dangerous drug as designated by Business
2 and Professions Code section 4022. It is an erectile-dysfunction treatment drug.

3 37. **Prinivil** and **Zestril** are brand names for lisinopril, a dangerous drug as designated by
4 Business and Professions Code section 4022. It is a drug used to treat hypertension.

5 FACTUAL SUMMARY

6 38. Between in or about September 2014 and July 2015, first as an intern pharmacist and
7 then as a licensed pharmacist, Respondent Wolff was employed by Walgreens Corporation. For
8 most or all that time, he worked as a “floater” intern pharmacist and licensed pharmacist, in at
9 least twenty-four (24) different Walgreens pharmacy locations, including Respondent Walgreens
10 #02126. Respondent Wolff worked at Respondent Walgreens #02126 as an intern pharmacist on
11 or about September 2, 2014, November 18, 2014, November 26, 2014, December 12, 2014,
12 December 29, 2014, and January 27-30, 2015, and as a pharmacist on or about April 22, 2015,
13 April 28-29, 2015, May 5, 2015, and May 10-12, 2015. He had access to controlled substances
14 and dangerous drugs on these occasions, both as an intern pharmacist and licensed pharmacist.

15 39. During the tenure of his employment, Respondent took advantage of his access as an
16 intern/pharmacist to divert/steal, self-use, and sell or transport numerous controlled substances
17 and dangerous drugs, including but not limited to numerous narcotic controlled substances.

18 40. The exact number of instances of diversion/theft by Respondent Wolff, and the full
19 quantity of controlled substances or dangerous drugs diverted/stolen by Respondent Wolff, are not
20 known, but in the course of investigations conducted by the pharmacy and by police, the
21 following were among the observations, admissions, and revelations reported:

22 a. On or about July 3, 2015, a periodic inventory check of controlled substances
23 on hand at another Walgreens Pharmacy (#13948, located in Mountain View, CA) discovered a
24 significant discrepancy/shortage of **oxycodone 30mg** tablets. Review of video surveillance for
25 that location discovered footage of Respondent Wolff pilfering four (4) or five (5) bottles (100
26 tablets each) of **oxycodone 30mg** tablets on or about June 1, 2015. Subsequent review of video
27 footage discovered Respondent Wolff also pilfering bottles of **oxycodone 30mg** tablets on a
28 second occasion on or about June 1, 2015, and also on or about July 6, 2015, from this location.

1 b. On or about July 7, 2015, Respondent Wolff was terminated by Walgreens. On
2 that same date, Mountain View Police responded to a theft report by Walgreens, and interviewed
3 Respondent Wolff, who admitted to having stolen and self-administered **oxycodone** tablets from
4 the Walgreens #13948 on several occasions. Respondent Wolff admitted to stealing four (4)
5 bottles (100 tablets each) of **oxycodone 30mg** during the first week of June 2015, and admitted to
6 stealing a further two (2) bottles (100 tablets each) of **oxycodone 30mg** on July 6, 2015. He also
7 admitted to self-administering the **oxycodone**, and admitted that he had not been diagnosed with
8 any condition(s) warranting this medication, and had been issued no prescriptions for its use.

9 c. Respondent Wolff initially denied selling any of the stolen drugs, but police
10 investigation uncovered evidence of sales of some of the drugs by Respondent Wolff, including
11 text messages exchanged with a buyer. Respondent Wolff subsequently admitted to selling two
12 hundred (200) tablets of **oxycodone 30mg** in June 2015 for about \$1,500.00.

13 d. A subsequent police search of Respondent Wolff's vehicle (in the parking lot of
14 a Walgreens Pharmacy location in Cupertino, CA) discovered:

- 15 • One (1) bottle of **oxycodone 30mg** containing ninety-four (94) blue tablets;
- 16 • One (1) sealed bottle of **oxycodone 30mg** containing one hundred (100) tablets;
- 17 • One prescription bottle containing eleven (11) **Viagra 100mg** tablets;
- 18 • Two (2) gold/brown capsules of **Adderall XR 30mg**;
- 19 • Eleven (11) blue/red capsules of **Vyvanse 70mg**;
- 20 • One (1) bottle of **oxycodone 30mg** containing sixty-four (64) pink tablets that
21 were subsequently identified as **lisinopril 5mg** tablets;
- 22 • One (1) bottle of **oxycodone 15mg** containing eighty-three (83) green tablets;
- 23 • One (1) bottle of **oxycodone 30mg** containing fifty-eight (58) blue tablets;
- 24 • Four (4) empty **oxycodone 30mg** (100 tablet) bottles; and
- 25 • One (1) empty **oxycodone 20mg** (100 tablet) bottle.

26 e. On or about August 11, 2015, Walgreens Pharmacy #13948 reported an audit
27 covering the period from June 10, 2014 to July 13, 2015, which indicated a loss of seven hundred
28 and thirty-nine (739) tablets of **oxycodone 30mg** and two (2) tablets of **oxycodone 5mg**.

1 f. The audit by Walgreens Pharmacy #13948 did not report any losses of the other
2 strengths of **oxycodone**, or the other drugs, discovered in Respondent Wolff's car.

3 g. On or about August 26, 2015, Board of Pharmacy investigative staff reviewed
4 data from the Controlled Substance Utilization Review and Evaluation System (CURES) database
5 regarding controlled substance prescriptions dispensed to Respondent Wolff for the time period
6 from January 1, 2013 to August 26, 2015. The report showed a total of only four (4) prescriptions
7 dispensed to Respondent Wolff during that time, and none for any Schedule II controlled
8 substances or for any of the medications discovered by police in Respondent Wolff's car.

9 41. The Board of Pharmacy commenced investigations of Walgreens Pharmacy locations
10 at which Respondent Wolff had worked as a floater intern pharmacist or pharmacist. Among the
11 locations investigated was Respondent Walgreens #02126. That investigation commenced in or
12 about November 2015. As part of this investigation, Respondent Walgreens #02126 was asked to
13 perform an audit of controlled substance inventories. Respondent Walgreens #02126 reported an
14 audit of controlled substance inventories for the period June 2014 to November 2015.

15 42. In or about December 2015, Respondent Walgreens #02126 also reported two other
16 causes of significant losses of Schedule II drugs during the period in and between June 2014 and
17 November 2014: (1) employee pilferage by another employee in or about November 2014; and
18 (2) an armed robbery at the pharmacy in or about November 2014. But Respondent Walgreens
19 #02126 was not able to explain all of its significant losses of Schedule II controlled substances.

20 43. Subsequent audits of controlled substance inventories at Respondent Walgreens
21 #02126 revealed the following discrepancies/losses and variances in total inventory for each drug:

Drug Name and Strength	Quantity Loss	% Variance
Adderall 20mg	10	5 %
Adderall XR 25mg	21	1.9 %
d-amphetamine salt combo XR 10mg	17	0.6 %
d-amphetamine salt combo XR 15mg	51	2.2 %
d-amphetamine salt combo XR 20mg	76	0.54 %

	Drug Name and Strength	Quantity Loss	% Variance
1			
2	d-amphetamine salt combo XR 30mg	127	2.1 %
3	d-amphetamine salt combo 15mg	575	26.1 %
4	d-amphetamine salt combo 30mg	45	0.37 %
5	dextroamphetamine 10mg	616	5.7 %
6	dextroamphetamine ER 5mg	30	15 %
7	dextroamphetamine 5mg	21	1 %
8	fentanyl 100mcg/hr patch	18	9.2 %
9	fentanyl 25mcg/hr patch	15	2.4 %
10	Focalin XR 10mg	37	4.6 %
11	Focalin XR 15mg	13	13 %
12	Focalin XR 20mg	50	5.6 %
13	hydrocodone / acetaminophen 10-325mg	3,226	1.8 %
14	hydrocodone / acetaminophen 7.5-325mg	964	2.8 %
15	hydromorphone 3mg rectal suppository	229	100 %
16	methylphenidate 10mg	25	0.2 %
17	methylphenidate er 10mg	100	16.7 %
18	methylphenidate er 54mg	295	7 %
19	oxycodone ir 5mg	285	0.7%
20	oxycodone ir 10mg	135	1.5 %
21	oxycodone ir 20mg	33	2.8 %
22	oxycodone ir 30mg	625	1.7 %
23	oxycodone / acetaminophen 10-325mg	490	1.2 %
24	oxycodone / acetaminophen 5-325mg	501	7.4 %
25	Oxycontin 10mg	172	2.9 %
26	Vyvanse 50mg	13	0.3 %
27	Vyvanse 70mg	34	0.7 %
28			

1 **CAUSES FOR DISCIPLINE AGAINST RESPONDENT WOLFF**

2 FIRST CAUSE FOR DISCIPLINE

3 (Acts Involving Moral Turpitude, Dishonesty, Fraud, Deceit or Corruption)

4 44. Respondent Wolff is subject to discipline under section 4301(f) of the Code, in that
5 Respondent, as described in paragraphs 38-40 above, committed acts involving moral turpitude,
6 dishonesty, fraud, deceit, or corruption.

7
8 SECOND CAUSE FOR DISCIPLINE

9 (Furnishing of Controlled Substance(s))

10 45. Respondent Wolff is subject to discipline under section 4301(j) and/or (o) and/or
11 section 4059 of the Code, and/or Health and Safety Code section 11170, in that Respondent, as
12 described in paragraphs 38-40 above, furnished to himself or another without a valid prescription,
13 and/or conspired to furnish, and/or assisted or abetted furnishing of, a controlled substance.

14
15 THIRD CAUSE FOR DISCIPLINE

16 (Possession of Controlled Substance(s))

17 46. Respondent Wolff is subject to discipline under section 4301(j) and/or (o) and/or
18 section 4060 of the Code, and/or Health and Safety Code section 11350 and/or 11377, in that
19 Respondent, as described in paragraphs 38-40 above, possessed, conspired to possess, and/or
20 assisted in or abetted possession of, a controlled substance, without a valid prescription.

21
22 FOURTH CAUSE FOR DISCIPLINE

23 (Obtaining Controlled Substance by Fraud, Deceit or Subterfuge)

24 47. Respondent Wolff is subject to discipline under section 4301(j) and/or (o) of the
25 Code, and/or Health and Safety Code section 11173(a), in that Respondent, as described in
26 paragraphs 38-40 above, obtained, conspired to obtain, and/or assisted in or abetted the obtaining
27 of a controlled substance, by fraud, deceit, subterfuge, or concealment of material fact.

1 FIFTH CAUSE FOR DISCIPLINE

2 (Conviction of Substantially Related Crime(s))

3 48. Respondent Wolff is subject to disciplinary action under Code section 4301,
4 subsection (l), in that on or about February 16, 2016, he was convicted of violating Penal Code
5 section 484-487(a) (Grand Theft of Personal Property of a Value > \$950.00), a felony and Health
6 and Safety Code section 11352 (Transportation, Sale, Distribution of Controlled Substance –
7 **oxycodone**), a felony, both of which are crimes substantially related to the qualifications,
8 functions, and duties of his license. The circumstances are as follows:

9 49. On or about July 9, 2015, based on the conduct described above in paragraphs 38-40,
10 Respondent was charged by Felony Complaint, in a criminal case titled *People v. Brett Quentin*
11 *Wolff*, Case No. B1580229 in Santa Clara Superior Court, with violating (1) Penal Code section
12 484-487(a) (Grand Theft of Personal Property of a Value > \$950.00), a felony; (2) Health and
13 Safety Code section 11351 (Possession for Sale or Purchase for Sale of Controlled Substance –
14 **oxycodone**), a felony; and (3) Health and Safety Code section 11352 (Transportation, Sale,
15 Distribution of Controlled Substance – **oxycodone**), a felony. On or about February 16, 2016,
16 Respondent pleaded *nolo contendere* and was convicted of counts (1) and (3). Count (2) was
17 dismissed. On or about March 24, 2016, imposition of sentence was suspended and Respondent
18 was placed on formal criminal probation for three (3) years, on terms and conditions including six
19 (6) months in county jail (176 days CTS), an order to stay away from any Walgreens Pharmacy
20 (except for purposes of securing necessary medication), search conditions, abstention from drug
21 or alcohol use, substance abuse treatment, psychological counseling, and fines and fees.

22
23 SIXTH CAUSE FOR DISCIPLINE

24 (Unprofessional Conduct)

25 50. Respondent Wolff is subject to discipline under section 4301 of the Code in that
26 Respondent, as described in paragraphs 38-40 above, engaged in unprofessional conduct.

27 ///

28 ///

1 **CAUSES FOR DISCIPLINE AGAINST RESPONDENT WALGREENS #02126**

2 SEVENTH CAUSE FOR DISCIPLINE

3 (Failure to Maintain Pharmacy Security)

4 51. Respondent Walgreens #02126 is subject to discipline under section 4301(j) and/or
5 (o), and/or section 4113(c), of the Code, in combination with California Code of Regulations, title
6 16, section 1714(b), in that, as described in paragraphs 41-43 above, Respondent violated statutes
7 regulating controlled substances or dangerous drugs, and/or directly or indirectly violated,
8 attempted to violate, and/or assisted in or abetted violation of, laws or regulations governing the
9 practice of pharmacy, by failing to maintain pharmacy facilities, space, fixtures, and equipment so
10 that drugs were safely and properly prepared, maintained, secured and distributed.

11
12 EIGHTH CAUSE FOR DISCIPLINE

13 (Failure to Maintain Accurate and Secure Controlled Substances Inventory)

14 52. Respondent Walgreens #02126 is subject to discipline under section 4301(j) and/or
15 (o) and/or section 4113(c) of the Code, in combination with section 4081 of the Code, California
16 Code of Regulations, title 16, section 1718, and/or 21 CFR section(s) 1304.11, in that, as
17 described in paragraphs 41-43 above, Respondent violated statutes regulating controlled
18 substances or dangerous drugs, and/or directly or indirectly violated, attempted to violate, and/or
19 assisted in or abetted violation of, laws or regulations governing the practice of pharmacy, by acts
20 including failing to maintain an accurate and secure inventory of all controlled substances.

21
22 PRAYER

23 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
24 and that following the hearing, the Board of Pharmacy issue a decision:

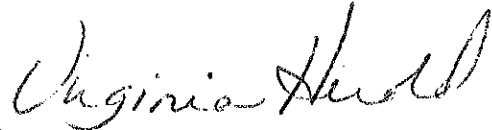
- 25 1. Revoking or suspending Pharmacist License Number RPH 72470, issued to Brett
26 Quentin Wolff (Respondent Wolff);
- 27 2. Revoking or suspending Original Pharmacy Permit Number PHY 52845, issued to
28 Walgreens Corporation dba Walgreens #02126 (Respondent Walgreens #02126);

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

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

DATED: 1/30/17



VIRGINIA HEROLD
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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