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

In the Matter of the Accusation Against:

SETON MEDICAL CENTER CORP. dba
SETON MEDICAL CENTER,
Original Permit No. HSP 45703 and
Sterile Compounding Permit No. LSC 100405; and

MARTHA ELISABETH YASAVOLIAN,
Original Pharmacist License No. RPH 41591,

Respondents

Agency Case No. 6774

OAH No. 2020020649

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective at 5:00 p.m. on January 20, 2021.

It is so ORDERED on December 21, 2020.

BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

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By

Greg Lippe Board President

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| 1 | XAVIER BECERRA | | |
| 2 | Attorney General of California CHAR SACHSON | | |
| 3 | Supervising Deputy Attorney General GREGORY TUSS | | |
| 4 | Deputy Attorney General State Bar No. 200659 | | |
| | 455 Golden Gate Avenue, Suite 11000 | | |
| 5 | San Francisco, CA 94102-7004 Telephone: (415) 510-3435 | | |
| 6 | Facsimile: (415) 703-5480 Attorneys for Complainant | | |
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| 8 | BEFORE THE | | |
| 9 | BOARD OF P DEPARTMENT OF CO | | |
| 10 | STATE OF CALIFORNIA | | |
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| 12 | In the Matter of the Accusation Against: | Case No. 6774 OAH No. 2020020649 | |
| 13 | SETON MEDICAL CENTER CORP. DBA Seton Medical Center | STIPULATED SURRENDER OF | |
| 14 | 1900 Sullivan Avenue Daly City, CA 94015 | LICENSE AND ORDER AS TO RESPONDENT SETON | |
| | | REST ON DETON | |
| 15 | Original Permit No. HSP 45703 Sterile Compounding Permit No. LSC | | |
| 16 | 100405, | | |
| 17 | MARTHA ELISABETH YASAVOLIAN 1004 W. Rose Circle | | |
| 18 | Los Altos, CA 94024-5035 | | |
| 19 | Original Pharmacist License No. RPH 41591, | | |
| 20 | Respondents. | | |
| 21 | Kespondents. | | |
| 22 | | | |
| 23 | IT IS STIPULATED AND AGREED by a | and between the parties to these proceedings that | |
| 24 | the following matters are true: | | |
| 25 | PART | TIES | |
| 26 | Anne Sodergren (Complainant) is to the state of the | the Executive Officer of the Board of Pharmacy | |
| 27 | (Board). She brought this action solely in her offi | cial capacity and is represented in this matter by | |
| 28 | Xavier Becerra, Attorney General of the State of California, and Gregory Tuss, deputy attorney | | |
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general.

- 2. Seton Medical Center Corp., dba Seton Medical Center (Respondent Seton), is represented in this proceeding by attorney Hope Levy-Biehl, whose address is Davis Wright Tremaine LLP, 865 South Figueroa Street, Suite 2400, Los Angeles, CA 90017.
- 3. On February 19, 2002, the Board issued Original Permit No. HSP 45703 to Seton Medical Center Corp. to do business as Seton Medical Center. This original permit was in full force and effect at all times relevant to the charges brought in Accusation No. 6774 and will expire on February 1, 2021, unless renewed.
- 4. On June 9, 2014, the Board issued Sterile Compounding Permit No. LSC 100405 to Respondent Seton. This sterile compounding permit was in full force and effect at all times relevant to the charges brought in this accusation and will expire on February 1, 2021, unless renewed.

JURISDICTION

5. Accusation No. 6774 was filed before the Board and is currently pending against Respondent Seton. The accusation and all other statutorily required documents were properly served on Respondent Seton on October 28, 2019. Respondent Seton timely filed its notice of defense contesting the accusation. A copy of Accusation No. 6774 is attached as exhibit 1 and incorporated by reference.

ADVISEMENT AND WAIVERS

- 6. Respondent Seton has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 6774. Respondent Seton also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Order as to Respondent Seton.
- 7. Respondent Seton is fully aware of its 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 it; the right to present evidence and to testify on its 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 Seton voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

- Respondent Seton understands that the charges and allegations in Accusation No.
 6774, if proven at a hearing, constitute cause for imposing discipline upon its Original Permit No.
 HSP 45703 and Sterile Compounding Permit No. LSC 100405.
- 10. For the purpose of resolving the accusation without the expense and uncertainty of further proceedings, Respondent Seton agrees that, at a hearing, Complainant could establish a factual basis for the charges in the accusation and that those charges constitute cause for discipline. Respondent Seton gives up its right to contest that cause for discipline exists based on those charges.
- 11. Respondent Seton understands that by signing this stipulation it enables the Board to issue an order accepting the surrender of its original permit and sterile compounding permit without further process.

CONTINGENCY

- 12. This stipulation shall be subject to approval by the Board. Respondent Seton understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and surrender without notice to or participation by Respondent Seton or its counsel. By signing the stipulation, Respondent Seton understands and agrees that it may not withdraw its agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender of License and Order as to Respondent Seton shall be of no force or effect except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.
- 13. The parties understand and agree that portable document format (PDF) and facsimile copies of this Stipulated Surrender of License and Order as to Respondent Seton,

including PDF and facsimile signatures, shall have the same force and effect as the originals.

- 14. This Stipulated Surrender of License and Order as to Respondent Seton is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order as to Respondent Seton may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.
- 15. In consideration of these admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS ORDERED that Original Permit No. HSP 45703 and Sterile Compounding Permit No. LSC 100405 issued to Respondent Seton Medical Center Corp., dba Seton Medical Center, are surrendered and accepted by the Board.

- The surrender of Respondent Seton's Original Permit No. HSP 45703 and Sterile Compounding Permit No. LSC 100405 shall be stayed for 120 days after the effective date of the Board's Decision and Order.
- 2. The surrender of Respondent Seton's original permit and sterile compounding permit, and the acceptance of the surrendered licenses by the Board shall constitute the imposition of discipline against Respondent Seton. This stipulation constitutes a record of the discipline and shall become a part of Respondent Seton's license history with the Board.
- 3. Respondent Seton shall lose all rights and privileges as a hospital pharmacy and sterile compounding pharmacy in California 120 days after the effective date of the Board's Decision and Order, or immediately upon the Board issuing a pharmacy permit(s) to any purchasers of the assets of Seton Medical Center, whichever is sooner;
- 4. Respondent Seton shall cause to be delivered to the Board its pocket licenses and, if issued, its wall certificates 120 days after the effective date of the Board's Decision and Order, or when the Board issues a pharmacy permit(s) to any purchasers of the assets of Seton Medical

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DBA SETON MEDICAL CENTER

Respondent Seton

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Center, whichever is sooner.

- 5. If Respondent Seton ever applies for licensure or petitions for reinstatement in the State of California, the Board shall treat it as a new application for licensure. Respondent Seton must comply with all the laws, regulations and procedures for licensure in effect at the time the application or petition is filed, and all of the charges and allegations contained in Accusation No. 6774 shall be deemed to be true, correct, and admitted by Respondent Seton when the Board determines whether to grant or deny the application or petition.
- Respondent Seton shall pay the agency its costs of investigation and enforcement 6. in the amount of \$13,755.00 prior to issuance of a new or reinstated license.
- Respondent Seton shall not apply for any license from the board for three years 7. from the effective date of this decision.
- If Respondent Seton should ever apply or reapply for a new license or 8. certification, or petition for reinstatement of a license by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 6774 shall be deemed to be true, correct, and admitted by Respondent Seton for the purpose of any statement of issues or any other proceeding seeking to deny or restrict licensure.

ACCEPTANCE

I am authorized to sign this stipulation on behalf of Seton Medical Center Corp., dba Seton Medical Center. I have carefully read the above Stipulated Surrender of License and Order as to Respondent Seton and have fully discussed it with my attorney, Hope Levy-Biehl. I understand the stipulation and the effect it will have on Original Permit No. HSP 45703 and Sterile Compounding Permit No. LSC 100405. I enter into this Stipulated Surrender of License and Order as to Respondent Seton voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED:

ETON MEDICAL CENTER CORP., **DBA SETON MEDICAL CENTER**

Respondent Seton

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| 1 | I have read and fully discussed with Res | pondent Seton Medical Center Corp., dba Seton | |
| 2 | Medical Center, the terms and conditions and other matters contained in this Stipulated Surrence | | |
| 3 | of License and Order as to Respondent Seton. | I approve its form and content. | |
| 4 | DATED: | Hope R Jeg Beetl | |
| 5 | | HOPE LEVY-BIEHL Attorney for Respondent Seton | |
| 6 | | | |
| 7 | ENDO | RSEMENT | |
| 8 | This Stipulated Surrender of License and Order as to Respondent Seton is submitted for | | |
| 9 | consideration by the Board of Pharmacy, Department of Consumer Affairs. | | |
| 10 | DATED: 10-15-20 | Respectfully submitted, | |
| 11 | | XAVIER BECERRA | |
| 12 | | Attorney General of California CHAR SACHSON | |
| 13 | | Supervising Deputy Attorney General | |
| 14 | | Colgory Tuss | |
| 15 | | GREGORY TUSS Deputy Attorney General | |
| 16 | | Attorneys for Complainant | |
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| 1 | I have read and fully discussed with Respondent Seton Medical Center Corp., dba Seton | | |
| 2 | Medical Center, the terms and conditions and other matters contained in this Stipulated Surrender | | |
| 3 | of License and Order as to Respondent Seton. I approve its form and content. | | |
| 4 | DATED: | | |
| 5 | HOPE LEVY-BIEHL Attorney for Respondent Seton | | |
| 6 | | | |
| 7 | ENDORSEMENT | | |
| 8 | This Stipulated Surrender of License and Order as to Respondent Seton is submitted for | | |
| 9 | consideration by the Board of Pharmacy, Department of Consumer Affairs. | | |
| 10 | DATED: Respectfully submitted, | | |
| 11 | XAVIER BECERRA | | |
| 12 | Attorney General of California CHAR SACHSON | | |
| 13 | Supervising Deputy Attorney General | | |
| 14 | | | |
| 15 | GREGORY TUSS Deputy Attorney General | | |
| 16 | Attorneys for Complainant | | |
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Exhibit 1

Accusation No. 6774

| 1 | XAVIER BECERRA | | |
|----|--|--|--|
| 2 | Attorney General of California CHAR SACHSON | | |
| 3 | Supervising Deputy Attorney General GREGORY TUSS | | |
| 4 | Deputy Attorney General State Bar No. 200659 | | |
| 5 | 455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102-7004 | | |
| 6 | Telephone: (415) 510-3435 Facsimile: (415) 703-5480 | | |
| 7 | Attorneys for Complainant | | |
| 8 | BEFOR | Е ТНЕ | |
| 9 | BOARD OF PHARMACY | | |
| 10 | DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA | | |
| 11 | | | |
| 12 | In the Matter of the Accusation Against: | Case No. 6774 | |
| 13 | SETON MEDICAL CENTER CORP. DBA Seton Medical Center | ACCUSATION | |
| 14 | 1900 Sullivan Avenue Daly City, CA 94015 | | |
| 15 | Original Permit No. HSP 45703 | | |
| 16 | Sterile Compounding Permit No. LSC 100405, | | |
| 17 | MARTHA ELISABETH YASAVOLIAN 1004 W. Rose Circle | | |
| 18 | Los Altos, CA 94024-5035 | | |
| 19 | Original Pharmacist License No. RPH 41591, | | |
| 20 | Respondents. | | |
| 21 | | | |
| 22 | | | |
| 23 | <u>PARTIES</u> | | |
| 24 | 1. Anne Sodergren (Complainant) brings this accusation solely in her official | | |
| 25 | capacity as the Interim Executive Officer of the Board of Pharmacy (Board), Department of | | |
| 26 | Consumer Affairs. | | |
| 27 | 2. On February 19, 2002, the Board is | ssued Original Permit No. HSP 45703 to Seton | |
| 28 | Medical Center Corp. to do business as Seton Medical Center Corp. to do business as Seton Medical Center Corp. | dical Center (Respondent Seton). This original | |
| | | 1 | |

permit was in full force and effect at all times relevant to the charges brought in this accusation and will expire on February 1, 2020, unless renewed.

- 3. On June 9, 2014, the Board issued Sterile Compounding Permit No. LSC 100405 to Respondent Seton. This sterile compounding permit was in full force and effect at all times relevant to the charges brought in this accusation and will expire on February 1, 2020, unless renewed.
- 4. On April 23, 1988, the Board issued Original Pharmacist License No. RPH 41591 to Martha Elisabeth Yasavolian (Respondent Yasavolian). This original pharmacist license was in full force and effect at all times relevant to the charges brought in this accusation and will expire on September 30, 2019, unless renewed.

JURISDICTION

- 5. This accusation is brought before the board under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.
 - 6. Section 4300 states in part:
 - "(a) Every license issued may be suspended or revoked.
- "(b) The board shall discipline the holder of any license issued by the board, whose default has been entered or whose case has been heard by the board and found guilty, by any of the following methods:
 - "(1) Suspending judgment.
 - "(2) Placing him or her upon probation.
 - "(3) Suspending his or her right to practice for a period not exceeding one year.
 - "(4) Revoking his or her license.
- "(5) Taking any other action in relation to disciplining him or her as the board in its discretion may deem proper."
 - 7. Section 4300.1 states:
- "The expiration, cancellation, forfeiture, or suspension of a board-issued license by operation of law or by order or decision of the board or a court of law, the placement of a license on a retired status, or the voluntary surrender of a license by a licensee shall not deprive the board

| 1 | of jurisdiction to commence or proceed with any investigation of, or action or disciplinary | |
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| 2 | proceeding against, the licensee or to render a decision suspending or revoking the license." | |
| 3 | 8. Section 4304 states: | |
| 4 | "The board may deny, revoke, or suspend any license issued pursuant to Section 4161 for | |
| 5 | any violation of this chapter or for any violation of Part 5 (commencing with Section 109875) of | |
| 6 | Division 104 of the Health and Safety Code." | |
| 7 | STATUTORY PROVISIONS | |
| 8 | 9. Section 4301 states in part: | |
| 9 | "The board shall take action against any holder of a license who is guilty of | |
| 10 | unprofessional conduct or whose license has been procured by fraud or misrepresentation or | |
| 11 | issued by mistake. Unprofessional conduct shall include, but is not limited to, any of the | |
| 12 | following: | |
| 13 | | |
| 14 | "(o) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the | |
| 15 | violation of or conspiring to violate any provision or term of this chapter or of the applicable | |
| 16 | federal and state laws and regulations governing pharmacy, including regulations established by | |
| 17 | the board or by any other state or federal regulatory agency." | |
| 18 | REGULATORY PROVISIONS | |
| 19 | 10. California Code of Regulations, title 16, section 1735.3, states in part: | |
| 20 | "(a) For each compounded drug preparation, pharmacy records shall include: | |
| 21 | | |
| 22 | "(2) A compounding log consisting of a single document containing all of the following: | |
| 23 | | |
| 24 | "(B) The date the drug preparation was compounded. | |
| 25 | | |
| 26 | "(H) The beyond use date or beyond use date and time of the final compounded drug | |
| 27 | preparation, expressed in the compounding document in a standard date and time format. | |
| 28 | | |

- "(J) Documentation of quality reviews and required post-compounding process and procedures."
 - 11. California Code of Regulations, title 16, section 1751.8, states in part:

"In conformity with and in addition to the requirements and limitations of section 1735.2, subdivision (h), every sterile compounded drug preparation shall be given and labeled with a beyond use date that does not exceed the shortest expiration date or beyond use date of any ingredient in sterile compounded drug preparation, nor the chemical stability of any one ingredient in the sterile compounded drug preparation, nor the chemical stability of the combination of all ingredients in the sterile compounded drug preparation, and that, in the absence of passing a sterility test in accordance with standards for sterility testing found in Chapter 797 of the United States Pharmacopeia - National Formulary (USP37-NF32) Through 2nd Supplement (37th Revision, Effective December 1, 2014), hereby incorporated by reference, that would justify an extended beyond use date, conforms to the following limitations:

. . .

- "(d) The beyond use date shall specify that storage and exposure periods cannot exceed 12 hours where the sterile compounded drug preparation is compounded solely with aseptic manipulations and all of the following apply:
- "(1) The preparation was compounded entirely within an ISO Class 5 PEC that is located in a segregated sterile compounding area and restricted to sterile compounding activities, using only sterile ingredients, components, and devices, by personnel properly cleansed and garbed"

. . .

"(e) Where any sterile compounded drug preparation was compounded either outside of an ISO class 5 PEC or under conditions that do not meet all of the requirements for any of subdivisions (a) through (d), the sterile compounded drug preparation shall be labeled 'for immediate use only' and administration shall begin no later than one hour following the start of the compounding process. Unless the 'immediate use' preparation is immediately and completely administered by the person who prepared it or immediate and complete administration is

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witnessed by the preparer, the preparation shall bear a label listing patient identification information, the names and amounts of all ingredients, the name or initials of the person who prepared the compounded sterile preparation, and the exact one-hour beyond use date and time. If administration has not begun within one hour following the start of the compounding process, the compounded sterile preparation shall be promptly, properly, entirely, and safely discarded. This provision does not preclude the use of a PEC to compound an 'immediate use' preparation. A PEC used solely to compound 'immediate use' preparations need not be placed within an ISO Class 7 cleanroom, with an ante-area. Such 'immediate use' preparations shall be compounded only in those limited situations where there is a need for immediate administration of a sterile preparation compounded outside of an ISO class 5 environment and where failure to administer could result in loss of life or intense suffering. Any such compounding shall be only in such quantity as is necessary to meet the immediate need and the circumstance causing the immediate need shall be documented in accordance with policies and procedures."

COST RECOVERY

12. Section 125.3, subdivision (a), states:

"Except as otherwise provided by law, in any order issued in resolution of a disciplinary proceeding before any board within the department or before the Osteopathic Medical Board, upon request of the entity bringing the proceedings, the administrative law judge may direct a licentiate 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."

FACTUAL BACKGROUND

- 13. On January 3, 2019, the Board conducted a sterile compounding inspection at Respondent Seton, an inpatient pharmacy. Respondent Yasavolian had been the pharmacist-incharge since November 16, 2015.
 - 14. The inspection revealed that Respondent Seton had compounded sterile drug

preparations outside an ISO Class 5¹ PEC² as immediate use, including 771 sterile drug preparations compounded between November 21, 2018, to January 3, 2019. None of these preparations had documentation of the circumstance showing that failure to immediately administer could result in loss of life or intense suffering. Some of these preparations were medium risk compounds, had more than one dose compounded, and were assigned beyond use dates that were longer than one hour.

- 15. Respondent Seton assigned beyond use dates that were longer than 12 hours to sterile preparations compounded in a segregated compounding area, including 81 sterile preparations compounded between December 4, 2018, to January 3, 2019.
- 16. Respondent Seton's compounding logs, including those from December 4, 2018, to January 3, 2019, did not document quality reviews, post-compounding process and procedures, compounding date, or beyond use date and time of the final compounded drug preparation.

FIRST CAUSE FOR DISCIPLINE

Unprofessional Conduct – Failure to Meet Criteria for Immediate Use Compounding

17. Respondents have subjected their permits and license to discipline for the unprofessional conduct of failing to meet the criteria to compound immediate use sterile drug preparations (Bus. & Prof. Code, § 4301, subd. (o); Cal. Code Regs., tit. 16, § 1751.8, subd. (e)). The circumstances are set forth above in paragraphs 13-14 above.

SECOND CAUSE FOR DISCIPLINE

Unprofessional Conduct – Incorrect Assignment of Beyond Use Dates

18. Respondents have subjected their permits and license to discipline for the unprofessional conduct of assigning beyond use dates greater than 12 hours to preparations compounded in a segregated area (Bus. & Prof. Code, §§ 4301, subd. (o); Cal. Code Regs., tit. 16, § 1751.8, subd. (d)(1)). The circumstances are set forth above in paragraphs 13 and 15 above.

¹ A clean environment standard developed by the International Organization for Standardization (ISO) that has at most 105 particles per cubic meter of air.

² Primary engineering controls (PEC) is device or room that provides an ISO Class 5 environment. While a PEC can be a room, it is commonly a hooded area certified to ISO Class 5 standards.

THIRD CAUSE FOR DISCIPLINE

Unprofessional Conduct – Failure to Document Quality Reviews, and Post-compounding Processes and Procedures

19. Respondents have subjected their permits and license to discipline for the unprofessional conduct of failing to document quality reviews, and post-compounding process and procedures in compounding logs (Bus. & Prof. Code, §§ 4301, subd. (o); Cal. Code Regs., tit. 16, § 1735.3, subd. (a)(2)(J)). The circumstances are set forth above in paragraphs 13 and 16 above.

FOURTH CAUSE FOR DISCIPLINE

Unprofessional Conduct – Failure to Document Compounding Date

20. Respondents have subjected their permits and license to discipline for the unprofessional conduct of failing to document the compounding date in compounding logs (Bus. & Prof. Code, §§ 4301, subd. (o); Cal. Code Regs., tit. 16, § 1735.3, subd. (a)(2)(B)). The circumstances are set forth above in paragraphs 13 and 16 above.

FIFTH CAUSE FOR DISCIPLINE

Unprofessional Conduct – Failure to Document Beyond Use Date and Time

21. Respondents have subjected their permits and license to discipline for the unprofessional conduct of failing to document beyond use date and time of the final compounded drug preparation in compounding logs (Bus. & Prof. Code, §§ 4301, subd. (o); Cal. Code Regs., tit. 16, § 1735.3, subd. (a)(2)(H)). The circumstances are set forth above in paragraphs 13 and 16 above.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this accusation, and that following the hearing, the Board of Pharmacy issues a decision:

- 1. Revoking or suspending Original Permit No. HSP 45703 issued to Respondent Seton;
- 2. Revoking or suspending Sterile Compounding Permit No. LSC 100405 issued to Respondent Seton;

| Î | | |
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| 1 | 3. Revoking or suspending Original Pharmacist License No. RPH 41591 issued to | |
| 2 | Respondent Yasavolian; | |
| 3 | 4. Ordering respondents to pay the board the reasonable costs of the investigation and | |
| 4 | enforcement of this case under Business and Professions Code section 125.3; and | |
| 5 | 5. Taking such other and further action as deemed necessary and proper. | |
| 6 | | |
| 7 | October 24, 2019 Anne Sodergran | |
| 8 | DATED: October 24, 2019 ANNE SODERGREN | |
| 9 | Interim Executive Officer Board of Pharmacy | |
| 10 | Department of Consumer Affairs State of California | |
| 11 | Complainant | |
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