

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

In the Matter of the First Amended Accusation  
Against:

Laurence A. Reich, D.O.  
9903 Santa Monica Blvd., Suite 744  
Beverly Hills, CA 90212

Osteopathic Physician & Surgeon No. 20A4424

Respondent.

Case No. 2000-07-1060


OAH No. L-2003070702

STIPULATED SURRENDER OF LICENSE AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted  
by the Osteopathic Medical Board of California as its Decision in the above-entitled  
matter.

This Decision shall become effective on APRIL 14, 2006.

IT IS SO ORDERED FEBRUARY 14, 2006.

  
\_\_\_\_\_  
MICHAEL J. FEINSTEIN, D.O., PRESIDENT  
OSTEOPATHIC MEDICAL BOARD OF CALIFORNIA

1 BILL LOCKYER, Attorney General  
of the State of California  
2 E. A. JONES III, State Bar No. 71375  
Deputy Attorney General  
3 California Department of Justice  
300 So. Spring Street, Suite 1702  
4 Los Angeles, CA 90013  
Telephone: (213) 897-2543  
5 Facsimile: (213) 897-9395

6 Attorneys for Complainant

7  
8 **BEFORE THE**  
**OSTEOPATHIC MEDICAL BOARD OF CALIFORNIA**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
9 **STATE OF CALIFORNIA**

10 In the Matter of the First Amended Accusation  
Against:

11 LAURENCE A. REICH, D.O.  
9903 Santa Monica Blvd., Suite 744  
12 Beverly Hills, CA 90212

13 Osteopathic Physician & Surgeon No. 20A4424

14 Respondent.

Case No. 2000-07-1060

OAH No. L-2003070702

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

15  
16  
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
18 proceeding that the following matters are true:

19 PARTIES

20 1. Linda J. Bergmann (Complainant) is the Executive Director of the  
21 Osteopathic Medical Board of California. She brought this action solely in her official capacity  
22 and is represented in this matter by Bill Lockyer, Attorney General of the State of California, by  
23 E. A. Jones III, Deputy Attorney General.

24 2. Laurence A. Reich, D.O. (Respondent) is represented in this proceeding by  
25 attorney Mark A. Levin, whose address is Lewin & Levin, 11377 West Olympic Boulevard, Los  
26 Angeles, California 90064-1683.

27 3. On or about February 28, 1979, the Osteopathic Medical Board of  
28 California issued Osteopathic Physician & Surgeon Certificate No. 20A4424 to Laurence A.

1 Reich, D.O. The Osteopathic Physician and Surgeon Certificate was in full force and effect at  
2 ally times relevant to the charges brought in First Amended Accusation No. 2000-07-1060 and  
3 will expire on October 31, 2006, unless renewed.

4 JURISDICTION

5 4. First Amended Accusation No. 2000-07-1060 was filed before the  
6 Osteopathic Medical Board of California (Board), Department of Consumer Affairs, and is  
7 currently pending against Respondent. The First Amended Accusation and all other statutorily  
8 required documents were properly served on Respondent on July 15, 2004. Respondent timely  
9 filed his Notice of Defense contesting the First Amended Accusation. A copy of First Amended  
10 Accusation No. 2000-07-1060 is attached as exhibit A and incorporated herein by reference.

11 ADVISEMENT AND WAIVERS

12 5. Respondent has carefully read, fully discussed with counsel, and  
13 understands the charges and allegations in First Amended Accusation No. 2000-07-1060.  
14 Respondent also has carefully read, fully discussed with counsel, and understands the effects of  
15 this Stipulated Surrender of License and Order.

16 6. Respondent is fully aware of his legal rights in this matter, including the  
17 right to a hearing on the charges and allegations in the First Amended Accusation; the right to be  
18 represented by counsel, at his own expense; the right to confront and cross-examine the witnesses  
19 against him; the right to present evidence and to testify on his own behalf; the right to the  
20 issuance of subpoenas to compel the attendance of witnesses and the production of documents;  
21 the right to reconsideration and court review of an adverse decision; and all other rights accorded  
22 by the California Administrative Procedure Act and other applicable laws.

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

25 CULPABILITY

26 8. Respondent admits that on December 19, 2002, he pled no contest to a  
27 criminal offense substantially related to the qualifications, functions or duties of an osteopathic  
28 physician and surgeon, and agrees that cause exists for discipline and hereby surrenders his

1 Osteopathic Physician & Surgeon Certificate No. 20A4424 for the Board's formal acceptance.

2 9. Respondent understands that by signing this stipulation he enables the  
3 Board to issue an order accepting the surrender of his Osteopathic Physician & Surgeon  
4 Certificate without further process.

5 RESERVATION

6 10. The admissions made by Respondent herein are only for the purposes of  
7 this proceeding, or any other proceedings in which the Osteopathic Medical Board of California  
8 or other professional licensing agency is involved, and shall not be admissible in any other  
9 criminal or civil proceeding.

10 CONTINGENCY

11 11. This stipulation shall be subject to approval by the Osteopathic Medical  
12 Board of California. Respondent understands and agrees that counsel for Complainant and the  
13 staff of the Osteopathic Medical Board of California may communicate directly with the Board  
14 regarding this stipulation and settlement, without notice to or participation by Respondent or his  
15 counsel. By signing the stipulation, Respondent understands and agrees that he may not  
16 withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers  
17 and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the  
18 Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this  
19 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not  
20 be disqualified from further action by having considered this matter.

21 12. The parties understand and agree that facsimile copies of this Stipulated  
22 Surrender of License and Order, including facsimile signatures thereto, shall have the same force  
23 and effect as the originals.

24 13. In consideration of the foregoing admissions and stipulations, the parties  
25 agree that the Board may, without further notice or formal proceeding, issue and enter the  
26 following Order:

27 ORDER

28 IT IS HEREBY ORDERED that Osteopathic Physician & Surgeon Certificate No.

1 20A4424, issued to Respondent Laurence A. Reich, D.O. is surrendered and accepted by the  
2 Osteopathic Medical Board of California.

3 14. The surrender of Respondent's Osteopathic Physician & Surgeon  
4 Certificate and the acceptance of the surrendered license by the Board shall constitute the  
5 imposition of discipline against Respondent. This stipulation constitutes a record of the  
6 discipline and shall become a part of Respondent's license history with the Board.

7 15. Respondent shall lose all rights and privileges as a doctor of osteopathy in  
8 California as of the effective date of the Board's Decision and Order.

9 16. Respondent shall cause to be delivered to the Board both his wall and  
10 pocket license certificates on or before the effective date of the Decision and Order.

11 17. Respondent fully understands and agrees that if he ever files an application  
12 for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a  
13 petition for reinstatement. Respondent must comply with all the laws, regulations and  
14 procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all  
15 of the charges and allegations contained in First Amended Accusation No. 2000-07-1060 shall be  
16 deemed to be true, correct, and admitted by Respondent when the Board determines whether to  
17 grant or deny the petition.

18 18. Should Respondent ever apply or reapply for a new license or certification,  
19 or petition for reinstatement of a license, by any other health care licensing agency in the State of  
20 California, all of the charges and allegations contained in First Amended Accusation, No.  
21 2000-07-1060 shall be deemed to be true, correct, and admitted by Respondent for the purpose of  
22 any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

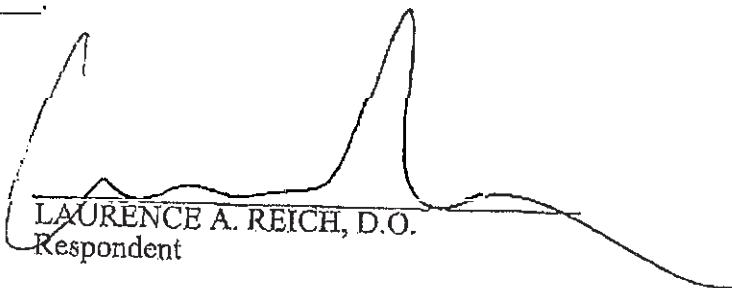
23 19. Respondent shall pay the Board its costs of investigation and enforcement  
24 in the amount of \$20,000.00 prior to issuance of a new or reinstated license.

25  
26 ACCEPTANCE

27 I have carefully read the above Stipulated Surrender of License and Order and  
28 have fully discussed it with my attorney, Mark A. Levin. I understand the stipulation and the


1 effect it will have on my Osteopathic Physician & Surgeon Certificate. I enter into this  
 2 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to  
 3 be bound by the Decision and Order of the Osteopathic Medical Board of California.

4 DATE: 2-9-06

5  
 6  
 7  
 8   
 9 LAURENCE A. REICH, D.O.  
 Respondent

10 I have read and fully discussed with Respondent Laurence A. Reich, D.O. the  
 11 terms and conditions and other matters contained in this Stipulated Surrender of License and  
 12 Order. I approve its form and content.

13 DATED: 2-10-06

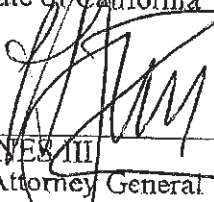
14   
 15 MARK A. LEVIN  
 16 Attorney for Respondent

17 ENDORSEMENT

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

21 DATED: 2/10/06

22  
 23 BILL LOCKYER, Attorney General  
 24 of the State of California

25   
 26 E. A. JONES III  
 27 Deputy Attorney General

28 Attorneys for Complainant

DOJ Docket Number/Matter ID: 03441160-LA02 2239  
 50077716.wpd

**Exhibit A**

**First Amended Accusation No. 2000-07-1060**

1 BILL LOCKYER, Attorney General  
of the State of California  
2 E. A. JONES III, State Bar No. 71375  
Deputy Attorney General  
3 California Department of Justice  
300 So. Spring Street, Suite 1702  
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5 Facsimile: (213) 897-9395  
6 Attorneys for Complainant

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

11 In the Matter of the First Amended Accusation  
Against:

12 LAURENCE A. REICH, D.O.  
9903 Santa Monica Blvd., Suite 744  
13 Beverly Hills, CA 90212  
14 Osteopathic Physician & Surgeon No. 20A4424  
15 Respondent.

Case No. 2000-07-1060

OAH No. L-2003070702

**First Amended**  
**ACCUSATION**

No. 02-28

16  
17 Complainant alleges:

18 PARTIES

19 1. Linda J. Bergmann (Complainant) brings this First Amended Accusation  
20 solely in her official capacity as the Executive Director of the Osteopathic Medical Board of  
21 California, Department of Consumer Affairs.

22 2. On or about February 28, 1979, the Osteopathic Medical Board of California  
23 issued Osteopathic Physician & Surgeon Number 20A4424 to Laurence A. Reich, D.O.  
24 (Respondent). The Osteopathic Physician & Surgeon was in full force and effect at all times relevant  
25 to the charges brought herein and will expire on October 31, 2004, unless renewed.

26 JURISDICTION

27 3. This First Amended Accusation is brought before the Osteopathic Medical  
28 Board of California (Board), Department of Consumer Affairs, under the authority of the following



1 sections of the Osteopathic Act (Act).<sup>1</sup>

2           4.       Section 2 of the Act states that the law governing licentiates of the Board is  
3 found in the Osteopathic Act and in Chapter 5 of Division 2 of the Business and Professions code  
4 (Code).<sup>2</sup>

5           5.       Section 2 of the Act states:

6           “The Osteopathic Medical Board of California shall enforce those portions of the  
7 Medical Practice Act identified as Article 12 (commencing with Section 2220), of Chapter  
8 5 of Division 2 of the Business and Professions Code, as now existing or hereafter amended,  
9 as to persons who hold certificates subject to the jurisdiction of the Osteopathic Medical  
10 Board of California....”

11          6.       Section 3600 of the Code states that the law governing licentiates of the  
12 Osteopathic Medical Board of California is found in the Osteopathic Act and in Chapter 5 of  
13 Division 2, relating to medicine.

14          7.       Section 726 of the Code states:

15          “The commission of any act of sexual abuse, misconduct, or relations with a patient,  
16 client, or customer constitutes unprofessional conduct and grounds for disciplinary action  
17 for any person licensed under this division, under any initiative act referred to in this division  
18 and under Chapter 17 (commencing with Section 9000) of Division 3.

19          “This section shall not apply to sexual contact between a physician and surgeon and  
20 his or her spouse or person in an equivalent domestic relationship when that physician and  
21 surgeon provides medical treatment, other than psychotherapeutic treatment, to his or her  
22 spouse or person in an equivalent domestic relationship.”

23          8.       Section 2234 of the Code states:

24 \_\_\_\_\_  
25 1. The Osteopathic Act is an initiative measure that was approved by the electorate on  
26 November 7, 1922. As a convenience, it appears in West’s Annotated Business and  
27 Professions Code commencing at section 3600, and in the appendix of Deering’s Business and  
28 Professions Code, following section 25762.

2. All section references are to the Business and Professions Code unless otherwise indicated.

1           The Division of Medical Quality shall take action against any licensee who is charged  
2 with unprofessional conduct. In addition to other provisions of this article, unprofessional  
3 conduct includes, but is not limited to, the following:

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

6           (b) Gross negligence.

7           (c) Repeated negligent acts.

8           (d) Incompetence.

9           (e) The commission of any act involving dishonesty or corruption which is  
10 substantially related to the qualifications, functions, or duties of a physician and surgeon.

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

12           (g) The practice of medicine from this state into another state or country without  
13 meeting the legal requirements of that state or country for the practice of medicine. Section  
14 2314 shall not apply to this subdivision. This subdivision shall become operative upon the  
15 implementation of the proposed registration program described in Section 2052.5.

16           9.     Section 2236 of the Code states:

17           (a) The conviction of any offense substantially related to the qualifications, functions,  
18 or duties of a physician and surgeon constitutes unprofessional conduct within the meaning  
19 of this chapter. The record of conviction shall be conclusive evidence only of the fact that  
20 the conviction occurred.

21           (b) The district attorney, city attorney, or other prosecuting agency shall notify the  
22 Division of Medical Quality of the pendency of an action against a licensee charging a felony  
23 or misdemeanor immediately upon obtaining information that the defendant is a licensee.  
24 The notice shall identify the licensee and describe the crimes charged and the facts alleged.  
25 The prosecuting agency shall also notify the clerk of the court in which the action is pending  
26 that the defendant is a licensee, and the clerk shall record prominently in the file that the  
27 defendant holds a license as a physician and surgeon.

28           (c) The clerk of the court in which a licensee is convicted of a crime shall, within 48

1 hours after the conviction, transmit a certified copy of the record of conviction to the board.

2 The division may inquire into the circumstances surrounding the commission of a crime in  
3 order to fix the degree of discipline or to determine if the conviction is of an offense  
4 substantially related to the qualifications, functions, or duties of a physician and surgeon.

5 (d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is  
6 deemed to be a conviction within the meaning of this section and Section 2236.1. The  
7 record of conviction shall be conclusive evidence of the fact that the conviction occurred.

#### 8 COST RECOVERY

9 10. Section 125.3 of the Code states, in pertinent part, that the Board may request  
10 the administrative law judge to direct a licentiate found to have committed a violation or violations  
11 of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
12 enforcement of the case.

#### 13 MEDI-CAL REIMBURSEMENT

14 11. Section 14124.12 of the Welfare and Institutions Code states, in part:

15 “(a) Upon receipt of written notice from the Medical Board of California, the  
16 Osteopathic Medical Board of California, or the Board of Dental Examiners of California, that a  
17 licensee's license has been placed on probation as a result of a disciplinary action, the department  
18 may not reimburse any Medi-Cal claim for the type of surgical service or invasive procedure that  
19 gave rise to the probation, including any dental surgery or invasive procedure, that was performed  
20 by the licensee on or after the effective date of probation and until the termination of all probationary  
21 terms and conditions or until the probationary period has ended, whichever occurs first. This section  
22 shall apply except in any case in which the relevant licensing board determines that compelling  
23 circumstances warrant the continued reimbursement during the probationary period of any Medi-Cal  
24 claim, including any claim for dental services, as so described. In such a case, the department shall  
25 continue to reimburse the licensee for all procedures, except for those invasive or surgical procedures  
26 for which the licensee was placed on probation.”

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1 FIRST CAUSE FOR DISCIPLINE

2 (Conviction of a Crime)

3 12. Respondent is subject to disciplinary action under section 2236 of the Code  
4 in that he was convicted of a crime that was substantially related to the qualifications, functions, or  
5 duties of a physician and surgeon. The circumstances are as follows:

6 13. On or about December 9, 2002, in a criminal proceeding entitled *The People*  
7 *of the State of California v. Laurence A. Reich* in Los Angeles County Superior Court, case number  
8 LA041280, respondent was convicted, on a plea of *nolo contendere*, of one count of sexual  
9 exploitation by a physician, a misdemeanor, in violation of Business and Professions Code section  
10 729, subdivision (a)(3). On December 19, 2002, respondent was sentenced to one year of summary  
11 probation. The circumstances underlying the conviction are as follows:

12 14. PATIENT Y.G. On or about February 8, 2000, Y.G.<sup>3</sup>, a female patient who  
13 was 35 years old at the time, went to Family Planning Medical Center (FPMC) to have an abortion  
14 procedure. Respondent, who worked at FPMC, performed the abortion.

15 15. On or about February 28, 2000, Y.G. returned to FPMC for a follow up  
16 examination. This examination was also performed by respondent. During the examination,  
17 respondent attempted to push Y.G.'s bra up and over her breasts. Y.G. commented that the nurse  
18 had not had her remove anything above her waist. Respondent responded by saying he wanted to  
19 do a breast examination. Y.G. then removed the clasp of her bra and respondent then pushed the bra  
20 over her breasts. Respondent then grabbed her right breast with both hands and squeezed her right  
21 breast. He did the same to her left breast. Respondent also commented that Y.G. had horrible scars  
22 on her breasts.

23 16. Y.G. did not inform respondent that she was experiencing a loss of urine with  
24 an increase of intra-abdominal pressure. However, later during that examination, respondent stood  
25 between Y.G.'s legs and put his fingers into her vagina. Respondent then asked her to squeeze her  
26

27 \_\_\_\_\_  
28 3. To protect the privacy of the patients and other witnesses, only their initials will be used. Further identifying information will be provided to respondent in discovery.

1 vagina. Y.G. then clenched her vaginal muscles and stomach muscles. Respondent then told her  
2 to squeeze again with her vaginal muscles only. Y.G. squeezed her vaginal muscles two more times.  
3 Respondent then pulled his fingers out of Y.G.'s vagina and walked away.

4 17. As Y.G. was attempting to dress, respondent observed her and attempted to  
5 engage her in a conversation. Respondent asked Y.G. how often she had sex and whether she was  
6 serious about her relationship. Y.G. then made an appointment to visit the clinic on March 6, 2000,  
7 to get a pap smear, blood test, and a three month birth control shot. However, respondent continued  
8 to pursue the conversation, and he asked her if she had considered having sex outside her current  
9 relationship. Respondent then gave her his home, office and pager numbers and told her if she was  
10 ever in Beverly Hills that she should call him and they would get together. Respondent also wrote  
11 a prescription for a pain killer medication.

12 18. PATIENT S.E. On or about September 25, 1999, S.E., a female patient who  
13 was 29 years old at the time, went to FPMC for an annual examination and was seen by respondent.  
14 S.E. did not inform respondent that she was experiencing a loss of urine with an increase of intra-  
15 abdominal pressure. However, during the examination, respondent inserted his fingers inside S.E.'s  
16 vagina and asked her to squeeze her vaginal muscles. Despite being uncomfortable with the request,  
17 S.E. complied. Respondent continued with a visual examination of S.E.'s cervix. He asked S.E. if  
18 she was aware that she had cervical scarring. Concerned about the remark, S.E. inquired about the  
19 potential causes of such scarring. Respondent replied that the scarring could have resulted from a  
20 prior surgery or some sort of disease. He then told S.E. that he had additional offices in the Los  
21 Angeles area and that she should contact him to further investigate the cause of her cervical scarring.

22 19. Respondent then asked S.E. whether she liked condoms and told her he could  
23 provide her with as many as she wanted. S.E. declined his offer. He then told her to get dressed and  
24 to go to his office for a private discussion. Hoping that he would write a refill prescription, S.E.  
25 complied. Once in the office, respondent inquired again about S.E.'s preference for condoms. S.E.  
26 repeated that she did not need condoms and asked if he wanted to discuss the scarring. Respondent  
27 replied that he would have to wait until her laboratory results returned to determine whether there  
28 were any abnormal cell counts. He then offered to call S.E. personally when he obtained the results.

1 She declined the offer. Respondent persisted and said he nevertheless wanted her telephone number  
2 to discuss the results. Frustrated and afraid, patient S.E. gave respondent the telephone number to  
3 her parents' home. When S.E. got up to leave respondent's office, he gave her an FPMC business  
4 card on which he wrote his home, cellular and another office number and told her she could contact  
5 him at any time.

6           20. After S.E. left FPMC, respondent attempted to contact her at her parents'  
7 house. S.E.'s mother told respondent that S.E. was on the way to her house and he should contact  
8 her there. Later that day, respondent contacted S.E. and asked how she was doing. He also told her  
9 not to worry about the scarring until the lab results came in. At that time he would call her again.  
10 During the conversation he also brought up the topic of condoms again.

11           21. Over a month later, S.E. went to another physician to check for the cervical  
12 scarring that respondent had mentioned. This physician found no evidence of any scarring on S.E.'s  
13 cervix.

14   SECOND CAUSE FOR DISCIPLINE

15   (Gross Negligence)

16           22. Respondent is subject to disciplinary action under section 2234, subdivision  
17 (b), of the Code in that respondent was grossly negligent in the care and treatment of patients. The  
18 circumstances are as follows:

19           23. The facts and allegation in paragraphs 12 through 21, inclusive, are  
20 incorporated here by reference.

21           24. The following acts and omissions of respondent during his care, treatment and  
22 management of patients, singularly and collectively, constituted extreme departures from the  
23 standard of care:

24           a. Respondent attempted to solicit a sexual relationship with Y.G.

25           b. Respondent attempted to solicit a sexual relationship with S.E. by attempting  
26 to frighten her by misleading her into believing that she had cervical scarring.

27 ////

28 ////

1 THIRD CAUSE FOR DISCIPLINE

2 (Sexual Misconduct)

3 25. Respondent is subject to disciplinary action under section 726 of the Code in  
4 that he committed acts of sexual misconduct in the care and treatment of patients. The  
5 circumstances are as follows:

6 26. The facts and allegation in paragraphs 12 through 21, inclusive, are  
7 incorporated here by reference.

8 DISCIPLINE CONSIDERATIONS

9 27. To determine the degree of discipline, if any, to be imposed on respondent,  
10 Complainant alleges that on or about December 3, 1982, in a prior disciplinary action entitled In the  
11 Matter of the Accusation Against Laurence A. Reich, D.O., before the Osteopathic Medical Board  
12 of California, in Case Number 82-18, respondent's license was suspended indefinitely, subject to  
13 satisfaction of certain terms and conditions. Upon satisfaction of the terms and conditions,  
14 respondent's license was revoked; however, the revocation was stayed and respondent was placed  
15 on probation for ten (10) years for sexual misconduct in the care and treatment of three patients in  
16 violation of section 726 of the Code. That decision is now final and is incorporated by reference as  
17 if fully set forth.

18 PRAYER

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

21 1. Revoking or suspending Osteopathic Physician & Surgeon Number 20A4424,  
22 issued to Laurence A. Reich, D.O.;

23 2. Ordering Laurence A. Reich, D.O. to pay the Osteopathic Medical Board of  
24 California the reasonable costs of the investigation and enforcement of this case, pursuant  
25 to Business and Professions Code section 125.3;

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3. Taking such other and further action as deemed necessary and proper.

DATED: July 14, 2004

  
for LINDA J. BERGMANN  
Executive Director  
Osteopathic Medical Board of California  
Department of Consumer Affairs  
State of California  
Complainant

60048431.wpd