

IN THE MATTER OF	*	BEFORE THE MARYLAND
SARAH A. COMBS, M.D.	*	STATE BOARD OF
Respondent	*	PHYSICIANS
License Number: D87333	*	Case Number: 2223-0025

* * * * *

CONSENT ORDER

PROCEDURAL BACKGROUND

The Maryland Board of Physicians (the “Maryland Board”) received information that Sarah A. Combs, M.D., (the “Respondent”) License Number D87333, was disciplined by the Medical Board of California (the “California Board”). In a Decision dated September 14, 2022, effective October 14, 2022, the Respondent was reprimanded by the California Board subject to certain terms.

Based on the above referenced California Board sanction, the Maryland Board has grounds to charge the Respondent with violating the following provisions of the Maryland Medical Practice Act (the “Act”), under H. O. § 14-404(a):

- (a) Subject to the hearing provisions of § 14-405 of this subtitle, a disciplinary panel, on the affirmative vote of a majority of the quorum of the disciplinary panel, may reprimand any licensee, place any licensee on probation, or suspend or revoke a license if the licensee:
 - (21) Is disciplined by a licensing or disciplinary authority or convicted or disciplined by a court of any state or country or disciplined by any branch of the United States uniformed services or the Veteran’s Administration for an act that would be grounds for disciplinary action under this section,

Disciplinary Panel A (“Panel A”) has determined that the acts for which the Respondent was disciplined in California would be grounds for disciplinary action under

H.O. § 14-404(a). The grounds for disciplinary action under H.O. § 14-404(a) are as follows:

- (22) Fails to meet appropriate standards as determined by appropriate peer review for the delivery of quality medical and surgical care performed in an outpatient surgical facility, office, hospital, or any other location in this State;
- (40) Fails to keep adequate records as determined by appropriate peer review[.]

Based on the action taken by the California Board, the Respondent agrees to enter into this Consent Order with Panel A, consisting of Procedural Background, Findings of Fact, Conclusions of Law, Order and Consent.

FINDINGS OF FACT

Panel A makes the following findings of fact:

1. At all times relevant hereto, the Respondent was a physician licensed to practice medicine in the State of Maryland. The Respondent was initially licensed in Maryland on or about April 25, 2019.
2. By its September 14, 2022 Decision (effective October 14, 2022), the California Board adopted a Stipulated Settlement and Disciplinary Order wherein the Respondent was reprimanded, required to complete an education course and reimburse the California Board costs of its investigation and enforcement.
3. In its Decision, the California Board found that the Respondent failed to order the correct test to assess a patient for acute iron toxicity, failed to appropriately review and interpret the test results received, failed to properly assess and document the etiology of the patient's continuing nausea and whether or not the patient's nausea would persist and failed to properly document the patient's tachycardia.

A copy of the California Board Decision is attached hereto.

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact, Panel A concludes as a matter of law that the Respondent is subject to discipline under Health Occ. § 14-404(a)(21) for the disciplinary action taken by the California Board against the Respondent for an act or acts that would be grounds for disciplinary action under Health Occ. §14-404(a)(22) and (40).

ORDER

It is, thus, by Panel A, hereby:

ORDERED that the Respondent be and is hereby **REPRIMANDED**; and it is further

ORDERED that the Respondent shall comply with the terms and conditions of the September 14, 2022 Decision she entered into with the California; and it is further

ORDERED that the effective date of the Consent Order is the date the Consent Order is signed by the Executive Director of the Board or her designee. The Executive Director or her designee signs the Consent Order on behalf of the disciplinary panel which has imposed the terms and conditions of this Consent Order; and it is further

ORDERED that the Respondent is responsible for all costs incurred in fulfilling the terms and conditions of this Consent Order; and it is further

ORDERED that, if the Respondent allegedly fails to comply with any term or condition imposed by this Consent Order, the Respondent shall be given notice and an opportunity for a hearing. If the disciplinary panel determines there is a genuine dispute as to a material fact, the hearing shall be before an Administrative Law Judge of the Office of Administrative Hearings followed by an exceptions process before a disciplinary panel; and if the disciplinary panel determines there is no genuine dispute as

to a material fact, the Respondent shall be given a show cause hearing before a disciplinary panel; and it is further

ORDERED that, after the appropriate hearing, if the disciplinary panel determines that the Respondent has failed to comply with any term or condition imposed by this Consent Order, the disciplinary panel may reprimand the Respondent, place the Respondent on probation with appropriate terms and conditions, or suspend Respondent's license with appropriate terms and conditions, or revoke the Respondent's license. The disciplinary panel may, in addition to one or more of the sanctions set forth above, impose a civil monetary fine on the Respondent; and it is further

ORDERED that this Consent Order is a public document. *See* Health Occ. §§1-607, 14-411.1(b)(2) and Gen. Prov. §4-333(b)(6).

Signature on File

11/09/2022
Date

Christine A. Farrelly
Executive Director
Maryland Board of Physicians

CONSENT

I, Sarah A. Combs, MD, acknowledge that I am aware of my right to consult with and be represented by counsel in considering this Consent Order. I have chosen to proceed without counsel and I acknowledge that the decision to proceed without counsel is freely and voluntarily made.

By this Consent, I agree to be bound by this Consent Order and all its terms and conditions and understand that the disciplinary panel will not entertain any request for amendments or modifications to any condition.

I assert that I am aware of my right to a formal evidentiary hearing, pursuant to Md. Code Ann., Health Occ. § 14-405 and Md. Code Ann., State Gov't §§ 10-201 *et seq.* I waive this right and have elected to sign this Consent Order instead.

I acknowledge the validity and enforceability of this Consent Order as if entered after the conclusion of a formal evidentiary hearing in which I would have had the right to counsel, to confront witnesses, to give testimony, to call witnesses on my behalf, and to all other substantive and procedural protections as provided by law. I waive those procedural and substantive protections. I acknowledge the legal authority and the jurisdiction of the disciplinary panel to initiate these proceedings and to issue and enforce this Consent Order.

I voluntarily enter into and agree to comply with the terms and conditions set forth in the Consent Order. I waive any right to contest the Findings of Fact and Conclusions of Law and Order set out in the Consent Order. I waive all rights to appeal this Consent Order.

I sign this Consent Order, without reservation, and fully understand the language and meaning of its terms.

Signature on File

10/28/2022
Date

Sarah A. Combs, MD
Respondent

NOTARY

STATE OF WASHINGTON, DC

CITY/COUNTY OF N/A

I HEREBY CERTIFY that on this 28 day of OCTOBER, 2022, before me, a Notary Public of the State and City/County aforesaid, personally Sarah A. Combs, MD, and made oath in due form of law that the foregoing Consent Order was her voluntary act and deed.

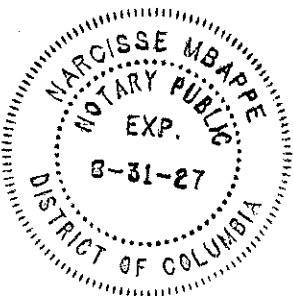
AS WITNESS my hand and notarial seal.

[Signature]

Notary Public

NARCISSE MBAPPE
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires August 31, 2027

My Commission expires: _____



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

In the Matter of the First Amended
Accusation Against:

Sarah Ash Combs, M.D.

Physician's and Surgeon's
Certificate No. A 125860

Case No.: 800-2020-067207

Respondent

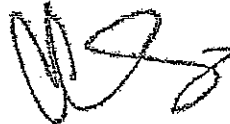
DECISION

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 October 14, 2022.

IT IS SO ORDERED: September 14, 2022.

MEDICAL BOARD OF CALIFORNIA



Laurie Rose Lubiano, J.D., Chair
Panel A

1 ROB BONTA
Attorney General of California
2 ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General
3 ROSEMARY F. LUZON
Deputy Attorney General
4 State Bar No. 221544
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8 *Attorneys for Complainant*

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

In the Matter of the First Amended Accusation
Against:

SARAH ASH COMBS, M.D.
3700 10th Avenue, Apt. 3H
San Diego, CA 92103

Physician's and Surgeon's Certificate
No. A 125860,

Respondent.

Case No. 800-2020-067207

OAH No. 2021100901

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
entitled proceedings that the following matters are true:

PARTIES

1. William Prasifka (Complainant) is the Executive Director of the Medical Board of
California (Board). He brought this action solely in his official capacity and is represented in this
matter by Rob Bonta, Attorney General of the State of California, by Rosemary F. Luzon, Deputy
Attorney General.

///

1 2. Respondent Sarah Ash Combs, M.D. (Respondent) is represented in this proceeding
2 by attorney Robert W. Frank, whose address is: Neil, Dymott, Frank, McCabe & Hudson APLC,
3 110 West A Street, Suite 1200, San Diego, CA 92101.

4 3. On or about May 22, 2013, the Board issued Physician's and Surgeon's Certificate
5 No. A 125860 Respondent. The Physician's and Surgeon's Certificate was in full force and effect
6 at all times relevant to the charges brought in First Amended Accusation No. 800-2020-067207.
7 The Physician's and Surgeon's Certificate expired on December 31, 2016, and has not been
8 renewed.

9 JURISDICTION

10 4. On or about March 3, 2022, First Amended Accusation No. 800-2020-067207 was
11 filed before the Board, and is currently pending against Respondent. The First Amended
12 Accusation and all other statutorily required documents were properly served on Respondent on
13 or about March 3, 2022, at her address of record. Respondent timely filed her Notice of Defense
14 contesting the First Amended Accusation.

15 5. A true and correct copy of First Amended Accusation No. 800-2020-067207 is
16 attached as Exhibit A and incorporated herein by reference as if fully set forth herein.

17 ADVISEMENT AND WAIVERS

18 6. Respondent has carefully read, fully discussed with counsel, and understands the
19 charges and allegations in First Amended Accusation No. 800-2020-067207. Respondent has
20 also carefully read, fully discussed with her counsel, and understands the effects of this Stipulated
21 Settlement and Disciplinary Order.

22 7. Respondent is fully aware of her legal rights in this matter, including the right to a
23 hearing on the charges and allegations in the First Amended Accusation; the right to confront and
24 cross-examine the witnesses against her; the right to present evidence and to testify on her own
25 behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the
26 production of documents; the right to reconsideration and court review of an adverse decision;
27 and all other rights accorded by the California Administrative Procedure Act and other applicable
28 laws, having been fully advised of same by his attorney, Robert W. Frank, Esq.

1 8. Having the benefit of counsel, Respondent voluntarily, knowingly, and intelligently
2 waives and gives up each and every right set forth above.

3 CULPABILITY

4 9. Respondent does not contest that, at an administrative hearing, Complainant could
5 establish a *prima facie* case with respect to the charges and allegations in First Amended
6 Accusation No. 800-2020-067207, and Respondent hereby gives up her rights to contest those
7 charges. Respondent further agrees that she has thereby subjected her Physician's and Surgeon's
8 Certificate No. A 125860 to disciplinary action.

9 10. Respondent agrees that if an accusation is ever filed against her before the Board, all
10 of the charges and allegations contained in First Amended Accusation No. 800-2020-067207 shall
11 be deemed true, correct, and fully admitted by Respondent for purposes of any such proceeding or
12 any other licensing proceeding involving Respondent in the State of California.

13 11. Respondent agrees that her Physician's and Surgeon's Certificate No. A 125860 is
14 subject to discipline and she agrees to be bound by the Board's imposition of discipline as set
15 forth in the Disciplinary Order below.

16 CONTINGENCY

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

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1 and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of
2 licensure in the State of California, if any. Following the completion of each course, the Board or
3 its designee may administer an examination to test Respondent's knowledge of the course.
4 Respondent shall provide proof of attendance for 40 hours of CME in satisfaction of this
5 condition.

6 3. INVESTIGATION/ENFORCEMENT COST RECOVERY. Respondent is hereby
7 ordered to reimburse the Board its costs of investigation and enforcement in the amount of
8 \$7,887.50 (seven thousand eight hundred eighty-seven dollars and fifty cents). Costs shall be
9 payable to the Medical Board of California. Failure to pay such costs shall be considered a
10 violation of this Order.

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

13 The filing of bankruptcy by Respondent shall not relieve Respondent of the responsibility
14 to repay investigation and enforcement costs.

15 4. FAILURE TO COMPLY. Any failure by Respondent to comply with the terms and
16 conditions of the Disciplinary Order set forth above shall constitute unprofessional conduct and
17 grounds for further disciplinary action.

18 5. FUTURE ADMISSIONS CLAUSE. If Respondent should ever apply or reapply for
19 a new license or certification, or petition for reinstatement of a license, by any other health care
20 licensing action agency in the State of California, all of the charges and allegations contained in
21 First Amended Accusation No. 800-2020-067207 shall be deemed to be true, correct, and
22 admitted by Respondent for the purpose of any Statement of Issues or any other proceeding
23 seeking to deny or restrict license in the State of California.

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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Robert W. Frank, Esq. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate No. A 125860. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: June 15, 2022


SARAH ASH COMBS, M.D.
Respondent

I have read and fully discussed with Respondent Sarah Ash Combs, M.D., the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 6-15-22


ROBERT W. FRANK, ESQ.
Attorney for Respondent

ENDORSEMENT

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

DATED: 6/15/22

Respectfully submitted,

ROB BONTA
Attorney General of California
ALEXANDRA M. ALVAREZ
Supervising Deputy Attorney General

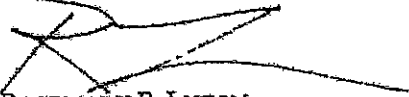

ROSEMARY F. LUZON
Deputy Attorney General
Attorneys for Complainant

Exhibit A

First Amended Accusation No. 800-2020-067207

1 ROB BONTA
Attorney General of California
2 ALEXANDRA M. ALVAREZ
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8 *Attorneys for Complainant*

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

In the Matter of the First Amended Accusation
Against:
SARAH ASH COMBS, M.D.
3700 10th Avenue, Apt. 3H
San Diego, CA 92103
Physician's and Surgeon's Certificate
No. A 125860,
Respondent.

Case No. 800-2020-067207
FIRST AMENDED ACCUSATION

Complainant alleges:

PARTIES

1. William Prasifka (Complainant) brings this First Amended Accusation solely in his official capacity as the Executive Director of the Medical Board of California, Department of Consumer Affairs (Board).
2. On or about May 22, 2013, the Medical Board issued Physician's and Surgeon's Certificate No. A 125860 to Sarah Ash Combs, M.D. (Respondent). The Physician's and Surgeon's Certificate expired on December 31, 2016, and has not been renewed.

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1 JURISDICTION

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

5 4. Section 2220 of the Code states:

6 Except as otherwise provided by law, the board may take action against all
7 persons guilty of violating this chapter. . .

8 5. Section 2227 of the Code states:

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

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

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

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

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

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

20 . . .

21 6. Section 2234 of the Code states:

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

24 . . .

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

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

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

7. Section 2266 of the Code states:

The failure of a physician and surgeon to maintain adequate and accurate records relating to the provision of services to their patients constitutes unprofessional conduct.

8. Section 118 of the Code states:

(b) The suspension, expiration, or forfeiture by operation of law of a license issued by a board in the department, or its suspension, forfeiture, or cancellation by order of the board or by order of a court of law, or its surrender without the written consent of the board, shall not, during any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or continue a disciplinary proceeding against the licensee upon any ground provided by law or to enter an order suspending or revoking the license or otherwise taking disciplinary action against the licensee on any such ground.

COST RECOVERY

9. Section 125.3 of the Code states:

(a) 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 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.

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1 FIRST CAUSE FOR DISCIPLINE

2 (Repeated Negligent Acts)

3 10. Respondent has subjected her Physician's and Surgeon's Certificate No. A 125860 to
4 disciplinary action under sections 2227 and 2234, as defined by section 2234, subdivision (c), of
5 the Code, in that she committed repeated negligent acts in her care and treatment of Patient A, as
6 more particularly alleged hereinafter:¹

7 11. On or about the night of January 6, 2016, Patient A, who was a teenager, presented at
8 the emergency department of Rady Children's Hospital in San Diego, California. According to
9 Patient A's father, Patient A had intentionally ingested seven tablets of Midol and 10 tablets of
10 iron approximately one and a half hours prior to arrival.

11 12. At the time, Respondent was a board-certified pediatrician and in training for her
12 subspecialty fellowship in pediatric emergency medicine. Respondent provided care and
13 treatment to Patient A, alongside Dr. S.L., her direct supervisor.

14 13. Upon arrival at the emergency department, Patient A complained of dizziness,
15 nausea, and vomiting. Patient A was ordered ondansetron for her dizziness and nausea at
16 approximately 23:39, followed by a fluid bolus approximately two and a half hours later.

17 14. Patient A's vital signs were taken, showing a heart rate of 133 beats per minute,
18 which was markedly tachycardic. An EKG also showed a heart rate of 108 beats per minute.
19 However, Patient A's cardiovascular status was noted on the physical exam as follows: "Normal
20 rate, regular rhythm and normal heart sounds."

21 15. According to the ED Provider Notes, lab tests were to be ordered, including an iron
22 level test. However, on or about January 7, 2016, at approximately 01:55, a ferritin level test was
23 erroneously ordered, not an iron level test.² The lab results reported the findings for "Ferritin,"
24 which were received at approximately 02:57. According to the lab results, the ferritin test showed

25 ¹ References to "Patient A" herein are used to protect patient privacy.

26 ² Ferritin is a protein that stores iron inside the cells. A ferritin test measures the level of
27 ferritin in the body. Ferritin levels indicate the amount of stored iron, but they do not measure the
28 iron outside of the cells. An iron test, in contrast, measures the amount of iron in the blood.
After a suspected overdose of iron, a serum iron level is the most appropriate test to order to
assess for acute toxicity.

1 a level of "8" ng/mL, with a reference range of 6-70 ng/mL. There were no lab results for iron.
2 Nevertheless, the ED Provider Notes stated: "Labs as per below, grossly WNL . . . Iron well
3 below threshold." The Plan and Discharge Instructions further stated: "Your iron level here was
4 normal."

5 16. At approximately 04:00 on or about January 7, 2016, Patient A complained of
6 additional nausea to the ED nurse. At approximately 04:02, an additional dose of ondansetron
7 was ordered, which was administered at 04:07. Approximately one hour later, Patient A was
8 discharged home, with the last physician re-assessment occurring at approximately 04:12. Prior
9 to discharge, there was no assessment done and no documentation made as to the etiology of
10 Patient A's continuing nausea and whether or not it would persist.

11 17. Following discharge, Patient A subsequently developed severe abdominal and chest
12 pain and returned to the emergency department later the same day. Patient A's lab results showed
13 a hemoglobin of 11.1 g/dL. Patient A was found to be in fulminant liver failure due to iron
14 overdose and required an emergency liver transplant.

15 18. On or about January 14, 2021, Respondent was interviewed in connection with the
16 Board's investigation regarding her care and treatment of Patient A. Respondent stated that she
17 intended to order a total body iron test for Patient A, not a ferritin test. When placing the order,
18 Respondent explained that she typed the word "iron" into the electronic medical record system.
19 According to Respondent, the system automatically defaulted to "ferritin" and, as a result, a
20 ferritin test was ordered instead of an iron test. However, the lab test options that appeared on the
21 screen were actually as follows, from top to bottom:

22 FERRITIN (IRON)

23 IRON

24 IRON + TIBC

25 Despite "IRON" appearing on the screen, the test for iron was not ordered.

26 19. At her Board interview, Respondent further stated that when she reviewed the labs,
27 the results appeared as either "ferritin paren iron" or "iron paren ferritin." Despite the word
28 "ferritin" appearing on the results, Respondent stated she expected that the results were

1 measuring what she thought she had ordered (i.e., an iron level), so she "glanced past it, as you
2 often do in the emergency room, [and] saw a normal level" According to Respondent, she
3 presumed that the result would likely be normal given the amount of iron tablets that Patient A
4 had reportedly ingested.

5 20. Respondent committed repeated negligent acts in her care and treatment of Patient A,
6 which included, but were not limited to the following:

7 (i) Respondent failed to order the correct test to assess for acute iron toxicity
8 and she failed to appropriately review and interpret the test results received;

9 (ii) Respondent failed to properly assess and document the etiology of Patient
10 A's continuing nausea and whether or not the patient's nausea would persist; and

11 (iii) Respondent failed to properly document Patient A's tachycardia.

12 SECOND CAUSE FOR DISCIPLINE

13 (Failure to Maintain Adequate and Accurate Medical Records)

14 21. Respondent has subjected her Physician's and Surgeon's Certificate No. A 125860 to
15 disciplinary action under sections 2227 and 2234, as defined by section 2266, of the Code, in that
16 she failed to maintain adequate and accurate records regarding her care and treatment of Patient
17 A, as more particularly alleged in paragraphs 10 through 20, above, which are hereby
18 incorporated by reference and re-alleged as if fully set forth herein.

19 PRAYER

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

22 1. Revoking or suspending Physician's and Surgeon's Certificate No. A 125860, issued
23 to Respondent Sarah Ash Combs, M.D.;

24 2. Revoking, suspending or denying approval of Respondent Sarah Ash Combs, M.D.'s
25 authority to supervise physician assistants, pursuant to section 3527 of the Code, and advanced
26 practice nurses;

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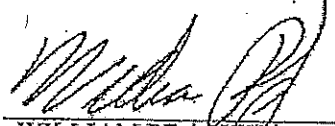
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3. Ordering Respondent Sarah Ash Combs, M.D., to pay the Board the costs of the investigation and enforcement of this case, and if placed on probation, the costs of probation monitoring; and

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

DATED: MAR 03 2022



WILLIAM PRASIFKA
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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