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

12 In the Matter of the Statement of Issues
Against:

Case No. 7031

13 **PHARMCORE, INC.,**
14 **DBA HALLANDALE PHARMACY**
DAVID G. RABBANI,
15 **PRESIDENT/CFO/DIRECTOR/OWNER**
16 **MEDHAT METTIAS, PHARMACIST-IN-**
CHARGE

STATEMENT OF ISSUES

17 **Nonresident Pharmacy Applicant**

18 Respondents.

19
20 **PARTIES**

21 1. Anne Sodergren (Complainant) brings this Statement of Issues solely in her official
22 capacity as the Executive Officer of the Board of Pharmacy (Board), Department of Consumer
23 Affairs.

24 2. On or about February 24, 2009, the Board issued Nonresident Pharmacy Permit
25 Number NRP 962 to Pharmcore, Inc., doing business as Hallandale Pharmacy (Respondent
26 Pharmcore), with Gennady Krupnikas (Krupnikas) as President and David G. Rabbani
27 (Respondent Rabbani) as Pharmacist-in-Charge. On July 1, 2014, Medhat Mettias (PIC Mettias)
28 became the Pharmacist-in-Charge.

1 (d) The board may initiate disciplinary proceedings to revoke or suspend any
2 probationary certificate of licensure for any violation of the terms and conditions of
probation. Upon satisfactory completion of probation, the board shall convert the
probationary certificate to a regular certificate, free of conditions.

3 (e) The proceedings under this article shall be conducted in accordance with Chapter
4 5 (commencing with Section 11500) of Part 1 of Division 3 of the Government Code,
and the board shall have all the powers granted therein. The action shall be final,
5 except that the propriety of the action is subject to review by the superior court
pursuant to Section 1094.5 of the Code of Civil Procedure.

6 **STATUTORY PROVISIONS**

7 4. Code section 480 states, in pertinent part:

8 (a) Notwithstanding any other provision of this code, a board may deny a license
9 regulated by this code on the grounds that the applicant has been convicted of a crime
or has been subject to formal discipline only if either of the following conditions are
10 met:

11 (1) The applicant has been convicted of a crime within the preceding seven years
12 from the date of application that is substantially related to the qualifications,
functions, or duties of the business or profession for which the application is made,
13 regardless of whether the applicant was incarcerated for that crime, or the applicant
has been convicted of a crime that is substantially related to the qualifications,
14 functions, or duties of the business or profession for which the application is made
and for which the applicant is presently incarcerated or for which the applicant was
15 released from incarceration within the preceding seven years from the date of
application. However, the preceding seven-year limitation shall not apply in either of
the following situations ...

16 (2) The applicant has been subjected to formal discipline by a licensing board in or
17 outside California within the preceding seven years from the date of application based
on professional misconduct that would have been cause for discipline before the
18 board for which the present application is made and that is substantially related to the
qualifications, functions, or duties of the business or profession for which the present
19 application is made. However, prior disciplinary action by a licensing board within
the preceding seven years shall not be the basis for denial of a license if the basis for
20 that disciplinary action was a conviction that has been dismissed pursuant to Section
1203.4, 1203.4a, 1203.41, 1203.42, or 1203.425 of the Penal Code or a comparable
21 dismissal or expungement.

22 (b) Notwithstanding any other provision of this code, a person shall not be denied a
license on the basis that the person has been convicted of a crime, or on the basis of
23 acts underlying a conviction for a crime, if that person has obtained a certificate of
rehabilitation under Chapter 3.5 (commencing with Section 4852.01) of Title 6 of
24 Part 3 of the Penal Code, has been granted clemency or a pardon by a state or federal
executive, or has made a showing of rehabilitation pursuant to Section 482.

25 (c) Notwithstanding any other provision of this code, a person shall not be denied a
license on the basis of any conviction, or on the basis of the acts underlying the
26 conviction, that has been dismissed pursuant to Section 1203.4, 1203.4a, 1203.41,
1203.42, or 1203.425 of the Penal Code, or a comparable dismissal or expungement.
27 An applicant who has a conviction that has been dismissed pursuant to Section
1203.4, 1203.4a, 1203.41, or 1203.42 of the Penal Code shall provide proof of the
28 dismissal if it is not reflected on the report furnished by the Department of Justice.

1 (d) Notwithstanding any other provision of this code, a board shall not deny a license
2 on the basis of an arrest that resulted in a disposition other than a conviction,
including an arrest that resulted in an infraction, citation, or a juvenile adjudication.

3 (e) A board may deny a license regulated by this code on the ground that the applicant
4 knowingly made a false statement of fact that is required to be revealed in the
5 application for the license. A board shall not deny a license based solely on an
6 applicant's failure to disclose a fact that would not have been cause for denial of the
license had it been disclosed.

7 ...

8 6. Code section 4300 states, in pertinent part, that the board may refuse a license to any
applicant guilty of unprofessional conduct.

9 7. Code section 4301 states, in pertinent part:

10 The board shall take action against any holder of a license who is guilty of
11 unprofessional conduct or whose license has been issued by mistake. Unprofessional
conduct shall include, but is not limited to, any of the following:

12 ...

13 (f) The commission of any act involving moral turpitude, dishonesty, fraud, deceit, or
14 corruption, whether the act is committed in the course of relations as a licensee or
otherwise, and whether the act is a felony or misdemeanor or not.

15 (g) Knowingly making or signing any certificate or other document that falsely
16 represents the existence or nonexistence of a state of facts.

17 ...

18 (l) The conviction of a crime substantially related to the qualifications, functions, and
19 duties of a licensee under this chapter. The record of conviction of a violation of
20 Chapter 13 (commencing with Section 801) of Title 21 of the United States Code
regulating controlled substances or of a violation of the statutes of this state
21 regulating controlled substances or dangerous drugs shall be conclusive evidence of
unprofessional conduct. In all other cases, the record of conviction shall be
22 conclusive evidence only of the fact that the conviction occurred. The board may
inquire into the circumstances surrounding the commission of the crime, in order to
23 fix the degree of discipline or, in the case of a conviction not involving controlled
substances or dangerous drugs, to determine if the conviction is of an offense
24 substantially related to the qualifications, functions, and duties of a licensee under this
chapter. A plea or verdict of guilty or a conviction following a plea of nolo
25 contendere is deemed to be a conviction within the meaning of this provision. The
board may take action when the time for appeal has elapsed, or the judgment of
26 conviction has been affirmed on appeal or when an order granting probation is made
suspending the imposition of sentence, irrespective of a subsequent order under
27 Section 1203.4 of the Penal Code allowing the person to withdraw his or her plea of
guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or
28 dismissing the accusation, information, or indictment.

...

1 (n) The revocation, suspension, or other discipline by another state of a license to
2 practice pharmacy, operate a pharmacy, or do any other act for which a license is
3 required by this chapter that would be grounds for revocation, suspension, or other
4 discipline under this chapter. Any disciplinary action taken by the board pursuant to
5 this section shall be coterminous with action taken by another state, except that the
6 term of any discipline taken by the board may exceed that of another state, consistent
7 with the board's enforcement guidelines. The evidence of discipline by another state
8 is conclusive proof of unprofessional conduct.

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

14 ...

15 8. Code section 4302 states:

16 The board may deny, suspend, or revoke any license where conditions exist in
17 relation to any person holding 10 percent or more of the ownership interest or where
18 conditions exist in relation to any officer, director, or other person with management
19 or control of the license that would constitute grounds for disciplinary action against a
20 licensee.

21 9. Code section 4303, subdivision (b), states:

22 The board may cancel, deny, revoke, or suspend a nonresident pharmacy registration,
23 issue a citation or letter of admonishment to a nonresident pharmacy, or take any
24 other action against a nonresident pharmacy that the board may take against a resident
25 pharmacy license, on any of the same grounds upon which such action might be taken
26 against a resident pharmacy, provided that the grounds for the action are also grounds
27 for action in the state in which the nonresident pharmacy is permanently located.

28 10. Code section 4307, subdivision (a), states:

Any person who has been denied a license or whose license has been revoked or is
under suspension, or who has failed to renew his or her license while it was under
suspension, or who has been a manager, administrator, owner, member, officer,
director, associate, or partner of any partnership, corporation, firm, or association
whose application for a license has been denied or revoked, is under suspension or
has been placed on probation, and while acting as the manager, administrator,
owner, member, officer, director, associate, or partner had knowledge of or
knowingly participated in any conduct for which the license was denied, revoked,
suspended, or placed on probation, shall be prohibited from serving as a manager,
administrator, owner, member, officer, director, associate, or partner of a licensee
as follows:

(1) Where a probationary license is issued or where an existing license is placed
on probation, this prohibition shall remain in effect for a period not to exceed five
years.

(2) Where the license is denied or revoked, the prohibition shall continue until the
license is issued or reinstated.

1 **FACTUAL ALLEGATIONS**

2 Respondents Pharmcore and Rabbani - Ownership/Location Information and Board Applications

3 11. On or about and between June 4, 2004, and August 23, 2015, Krupnikas and
4 Respondent Rabbani were each 50% owners of Respondent Pharmcore.

5 12. On or about December 1, 2008, the Board received a Nonresident Pharmacy Permit
6 Application for Respondent Pharmcore dated April 8, 2008 (original application). The original
7 application listed Respondent Rabbani as Pharmacist-in-Charge, but did not disclose Respondent
8 Rabbani as an owner of Respondent Pharmcore. The original application was signed by
9 Krupnikas, and stated Krupnikas was president of Respondent Pharmcore and there were no
10 shareholders. The original application was also signed by Respondent Rabbani, but the signature
11 was partially whited-out and stated “signed in error.”

12 13. On or about August 24, 2015, Krupnikas transferred his entire ownership of
13 Respondent Pharmcore to Respondent Rabbani, making Respondent Rabbani sole owner of
14 Respondent Pharmcore.

15 14. On or about June 3, 2020, the Board received an Ownership Information form signed
16 by Respondent Rabbani and Jessica Maman. The Ownership Information form stated that on
17 August 24, 2015, Krupnikas’s 50% of the shares in Respondent Pharmcore were cancelled and
18 Respondent Rabbani was issued Krupnikas’s 50% of the shares, giving Respondent Rabbani
19 100% of the shares in Respondent Pharmcore.

20 15. On or about June 3, 2020, the Board received a Nonresident Pharmacy License
21 Application for Respondent Pharmcore that was dated April 23, 2020. The application stated
22 there was a change of ownership with April 14, 2003 as the anticipated change of ownership date,
23 and change of location with April 14, 2003 as the anticipated move date. On or about July 13,
24 2020, the first page of the Nonresident Pharmacy License Application for Respondent Pharmcore
25 was amended to change the anticipated move date to July 30, 2018.

26 Respondent Rabbani – Federal Conviction

27 16. On or about October 27, 2015, in the case entitled *United States v. David G. Rabbani*
28 (United States District Court, District of Rhode Island, Case No. 1:14CR00123-01S), Respondent

1 Rabbani was convicted on his plea of guilty to a violation of Title 21 U.S.C. sections 331(a) and
2 333(a)(1) (Introduction of Misbranded Drug), a misdemeanor. The circumstances of the crime, as
3 stated in the Misdemeanor Information, are: On or about and between February 13, 2013, and
4 July 15, 2013, Krupnikas and Respondent Rabbani owned and operated Pharmacy Logistics, Inc.,
5 doing business as Ninth Street Pharmacy, that dispensed certain prescription drugs “based upon
6 invalid prescriptions, which were issued without regard for the customer’s physical condition or
7 any pre-existing medical conditions, without review of their medical records, without consultation
8 with a primary care physician, and without consideration of the reasons for which the drugs were
9 sought.”

10 Respondent Pharmcore - Out of State Discipline

11 17. On or about November 29, 2017, in the case entitled *In the Matter of the Complaint*
12 *Against Hallandale Pharmacy*, Case No. 1479, the Oklahoma Board of Pharmacy (Oklahoma
13 Board) disciplined Respondent Pharmcore, licensed as Hallandale Pharmacy. The circumstances
14 are that in 2016 Respondent Pharmcore shipped 627 prescriptions into Oklahoma after the
15 expiration of its nonresident pharmacy license, and prescribers were located in Florida and
16 California for patients located in Oklahoma. Further, in 2017, Respondent Pharmcore shipped
17 358 prescriptions into Oklahoma, and prescribers were located in Florida and California for
18 patients located in Oklahoma. Respondent Pharmcore also failed to send controlled substance
19 prescription records to the Oklahoma Prescription Drug Monitoring Program. Respondent
20 Pharmcore admitted the following violations:

21 a. Oklahoma Administrative Code (OAC) section 535:15-3-9(b)(1) and Oklahoma
22 Statutes (O.S.), title 59, section 353.18(A)(1), when Respondent Pharmcore failed to make an
23 application and receive an annual nonresident pharmacy license.

24 b. OAC section 535:15-3-9(e)(3) and O.S., title 63, section 2-309C, when
25 Respondent Pharmcore failed to send Schedule II, III, IV, and V prescription records to the
26 Oklahoma Prescription Drug Monitoring Program.

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1 c. OAC section 535:15-3-13(D), when Respondent Pharmcore dispensed a
2 prescription drug knowing or that it should have known that the prescription was issued without a
3 valid preexisting patient-prescriber relationship.

4 d. O.S., title 63, section 2-309(G), when Respondent Pharmcore solicited,
5 dispensed, received, or delivered a controlled dangerous substance through the mail, without
6 personally knowing the practitioner and circumstances clearly indicate such method of delivery is
7 in the best interest of the health and welfare of the ultimate user.

8 e. OAC section 535:15-3-14(a), when Respondent Pharmcore failed to maintain a
9 patient record system for whom prescription drug orders are dispensed.

10 f. OAC sections 535:15-3-2(b)(10)(C) and 535:15-3-2(b)(2), when Respondent
11 Pharmcore failed to have a pharmacy manager who was responsible for all aspects of the
12 operation related to the practice of pharmacy.

13 g. O.S., title 59, section 353.24(A)(4), when Respondent Pharmcore offered to the
14 public its services as a “pickup station” or intermediary for the purpose of having prescriptions
15 filled or delivered, or it authorized a person, firm or business establishment to act for it in this
16 manner.

17 18. On or about October 10, 2018, in the case entitled *In Re Pharmcore Inc d/b/a*
18 *Hallandale Pharmacy*, Case No. 18-0358, the Kentucky Board of Pharmacy (Kentucky Board)
19 disciplined Respondent Pharmcore, licensed as Hallandale Pharmacy, based upon the Kentucky
20 Board’s finding that from August 2017 to March 2018 Respondent Pharmcore shipped 22
21 prescriptions into Kentucky without a Kentucky pharmacy permit.

22 19. On or about June 10, 2019, in the case entitled *In the Matter of Hallandale Pharmacy*,
23 Case No. 17-185, the Kansas Board of Pharmacy (Kansas Board) disciplined Respondent
24 Pharmcore, licensed as Hallandale Pharmacy, based upon the Kansas Board’s finding that
25 Respondent Pharmcore moved its facility on July 17, 2018, but did not notify the Kansas Board
26 until November 28, 2018; Respondent Pharmcore failed to disclose discipline by the Oklahoma
27 Board in its renewal application or in its subsequent address change application to the Kansas
28 Board; and Respondent Pharmcore had the following violations: beyond use dates that were out

1 of the acceptable range, cleaning violations, saline was stored without temperature controls or
2 monitoring, a technician with improper garbing, had training that was not documented, surface
3 sampling was not completed, and compounding records were incomplete.

4 20. On or about March 7, 2019, in the case entitled *In the Matter of Pharmcore Inc., d/b/a*
5 *Hallandale Pharmacy*, Case No. 2018-000795, the Alaska Board of Pharmacy (Alaska Board)
6 disciplined Respondent Pharmcore pursuant to Alaska Statutes sections 08.01.75, 08.80.158(a),
7 08.80.158(e), 08.80.261(a)(14), and Alaska Administrative Code section 52.920(a)(3) and
8 52.920(a)(15). The circumstances are that Respondent Pharmcore shipped “high-risk
9 compounded products” to Alaska without a valid license, had deficiencies of USP Chapter 797
10 guidelines and assignment of use dates beyond standard practice of USP 797 guidelines, and
11 shipped approximately 138 prescriptions to Alaska without a valid license.

12 21. On or about May 29, 2019, in the case entitled *In the Matter of Pharmcore, Inc. d/b/a*
13 *Hallandale Pharmacy*, Case No. 19-0053, the Louisiana Board of Pharmacy (Louisiana Board)
14 disciplined Respondent Pharmcore based upon the Louisiana Board’s finding that Respondent
15 Pharmcore dispensed 65 prescriptions to Louisiana residents without a nonresident pharmacy
16 permit.

17 22. On or about July 2, 2019, in the case entitled *In the Matter of Hallandale Pharmacy*,
18 Agreed Order No. F-19-006, the Texas State Board of Pharmacy (Texas Board) disciplined
19 Respondent Pharmcore, licensed as Hallandale Pharmacy, based upon the Texas Board’s findings
20 as follows: Respondent Pharmcore entered into an Agreed Order with the Kentucky Board after
21 Respondent Pharmcore shipped compounded drug products into Kentucky when the pharmacy
22 did not hold a permit to operate as a pharmacy in Kentucky, and Respondent Pharmcore failed to
23 disclose disciplinary action by the Kentucky Board in its application for initial licensure as a
24 nonresident pharmacy with the Texas Board.

25 23. On or about November 20, 2019, in the case entitled *In the Matter of Disciplinary*
26 *Proceedings Regarding the Non-Resident Prescription Drug Outlet Registration in the State of*
27 *Colorado of Pharmcore Inc dba Hallandale Pharmacy*, Case Nos. 2019-5141 and 2019-4899, the
28 Colorado State Board of Pharmacy (Colorado Board) disciplined Respondent Pharmcore based

1 upon the Colorado Board's finding that Respondent Pharmcore failed to report discipline in
2 Louisiana to the Colorado Board for dispensing prescriptions into Louisiana prior to obtaining the
3 required permit.

4 24. On or about December 11, 2019, in the case entitled *In the Matter of Hallandale*
5 *Pharmacy*, Case No. 19-266, the Maryland Board of Pharmacy (Maryland Board) disciplined
6 Respondent Pharmcore, licensed as Hallandale Pharmacy, based upon the Maryland Board's
7 finding that Respondent Pharmcore failed to report the FDA 483 to the Maryland Board, failed to
8 timely submit a change of location application with the Maryland Board and dispensed drugs
9 without a Maryland permit for that location, failed to report discipline by the Oklahoma and
10 Kentucky Boards as required.

11 25. On or about July 8, 2020, in the case entitled *In the Matter of: Pharmcore dba*
12 *Hallandale*, Case No. A-2019-0249, the Ohio Board of Pharmacy (Ohio Board) disciplined
13 Respondent Pharmcore based upon the Ohio Board's finding that from November 2, 2015,
14 through July 9, 2018, Respondent Pharmcore dispensed 4,586 prescriptions for dangerous drugs
15 to Ohio residents while it was not licensed as a Terminal Distributor of Dangerous Drugs, and
16 Respondent Pharmcore did not disclose Respondent Rabbani's federal conviction as required in
17 its application for licensure.

18 26. On or about September 21, 2020, in the case entitled *In the Matter of Hallandale*
19 *Pharmacy*, Case No. 19-397, the Kansas Board disciplined Respondent Pharmcore based upon
20 the Kansas Board's finding that Respondent Pharmcore failed to notify the Kansas Board of
21 discipline from the following states within 30 days: Alaska, Minnesota, Louisiana, Texas,
22 Colorado and Maryland; and Respondent Pharmcore failed to disclose discipline by the Alaska
23 Board and discipline by the Louisiana Board in its application to renew its Kansas nonresident
24 pharmacy registration.

25 **FIRST CAUSE FOR DENIAL**

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

27 27. Respondent Pharmcore's permit applications are subject to denial under Code section
28 4300, in conjunction with Code section 4301, subdivision (f), in that Respondent Pharmcore

1 committed acts involving moral turpitude, dishonesty, fraud, deceit, or corruption as set forth in
2 paragraphs 11 through 15, above, and as specifically set forth as follows:

3 a. Respondent Pharmcore failed to disclose its shareholders in the original
4 application submitted to the Board.

5 b. Respondent Pharmcore failed to disclose its change of ownership in 2015 to the
6 Board until it submitted its permit applications to the Board on or about June 3, 2020.

7 c. Respondent Pharmcore failed to disclose its change of address to the Board
8 until it submitted its permit applications to the Board on or about June 3, 2020.

9 28. Respondent Pharmcore's permit applications are subject to denial under Code section
10 4300, in conjunction with Code sections 4301, subdivision (f), and 4302, in that Respondent
11 Rabbani committed acts involving moral turpitude, dishonesty, fraud, deceit, or corruption when
12 he signed the application dated April 8, 2008, that failed to disclose Respondent Pharmcore's
13 shareholders in the original application submitted to the Board, as set forth in paragraphs 11
14 through 15, above.

15 **SECOND CAUSE FOR DENIAL**

16 (Signing Documents Falsely Representing Facts)

17 29. Respondent Pharmcore's permit applications are subject to denial under Code section
18 4300, in conjunction with Code section 4301, subdivision (g), in that Respondent Pharmcore
19 made or signed the original application submitted to the Board that contained false information,
20 as set forth in paragraphs 11 through 15, above.

21 30. Respondent Pharmcore's permit applications are subject to denial under Code section
22 4300, in conjunction with Code sections 4301, subdivision (f), and 4302, in that Respondent
23 Rabbani signed the original application submitted to the Board that contained false information,
24 as set forth in paragraphs 11 through 15, above.

25 **THIRD CAUSE FOR DENIAL**

26 (Out of State Discipline)

27 31. Respondent Pharmcore's permit applications are subject to denial under Code
28 sections 480 and 4300, in conjunction with Code section 4301, subdivision (n), in that

1 Respondent Pharmcore was disciplined as a pharmacy by out of state agencies, as set forth in
2 paragraphs 17 through 26, above.

3 **FOURTH CAUSE FOR DENIAL**

4 (Violation of Laws Governing Pharmacy)

5 32. Respondent Pharmcore's permit applications are subject to denial under Code section
6 4300, in conjunction with Code section 4301, subdivision (o), in that Respondent Pharmcore
7 violated laws governing pharmacy, as set forth in paragraphs 17, its subparts, and 20, above.

8 33. Respondent Pharmcore's permit applications are subject to denial under Code section
9 4300, in conjunction with Code sections 4301, subdivision (o), and 4302, in that Respondent
10 Rabbani, as an owner and operator of Pharmacy Logistics, Inc., doing business as Ninth Street
11 Pharmacy, violated laws governing pharmacy when it illegally dispensed prescription drugs, as
12 set forth in paragraph 16, above.

13 **FIFTH CAUSE FOR DENIAL**

14 (Criminal Conviction)

15 34. Respondent Pharmcore's permit applications are subject to denial under Code
16 sections 480 and 4300, in conjunction with Code sections 4301, subdivision (l), and 4302, in that
17 Respondent Rabbani was convicted on his plea of guilty to a violation of Title 21 U.S.C. sections
18 331(a) and 333(a)(1) (Introduction of Misbranded Drug), a misdemeanor, as set forth in
19 paragraph 16, above. The crimes are substantially related to the qualifications, functions, and
20 duties of a licensee.

21 **OTHER CONSIDERATIONS**

22 35. On or about May 22, 2017 the Board issued Citation No. CI 2016 71050 to
23 Respondent Pharmcore for a violation of Code section 4127.2, subdivision (a), in that on or about
24 and between January 1, 2016, and June 30, 2016, Respondent Pharmcore shipped at least 15,033
25 prescriptions for 362,587 units of compounded sterile drug products into California without a
26 sterile compounding pharmacy license. Respondent Pharmcore paid the \$5,000 fine.

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PRAYER

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

1. Denying the Nonresident Pharmacy Permit application and Temporary Nonresident Pharmacy Permit application of Pharmcore, Inc., doing business as Hallandale Pharmacy;

2. Prohibiting Pharmcore, Inc. from serving as a manager, administrator, owner, member, officer, director, associate, or partner or in any other position with management or control of any pharmacy licensee;

3. Prohibiting David G. Rabbani from serving as a manager, administrator, owner, member, officer, director, associate, or partner or in any other position with management or control of any pharmacy licensee;

4. Prohibiting Medhat Mettias from serving as a manager, administrator, owner, member, officer, director, associate, or partner or in any other position with management or control of any pharmacy licensee; and,

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

DATED: 4/20/2021 _____

Signature on File _____

ANNE SODERGREN
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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