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

11 In the Matter of the Statement of Issues
Against:

Case No. 8150

12 **LUCIEN JOHN RAMONDETTA**

STATEMENT OF ISSUES

13
14 **Designated Representative-Wholesaler**
Applicant

15
16 Respondent.

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18 **PARTIES**

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

22 2. On or about May 5, 2025, the Board received an application for a Designated
23 Representative-Wholesaler from Lucien John Ramondetta (Respondent). On or about April 30,
24 2025, Respondent certified under penalty of perjury to the truthfulness of all statements, answers,
25 and representations in the application. The Board denied the application on October 13, 2025.

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4. Section 4300, subdivision (c), of the Code states, in pertinent part, the Board may refuse a license to any applicant guilty of unprofessional conduct.

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relations with a patient pursuant to Section 726 or sexual exploitation as defined in subdivision (a) of Section 729.

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

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7. Section 4301 of the Code states, in pertinent part:

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

(a) Procurement of a license by fraud or misrepresentation.

...

(f) The commission of any act involving moral turpitude, dishonesty, fraud, deceit, or 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.

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

...

(p) Actions or conduct that would have warranted denial of a license.

...

8. Section 4307 of the Code states, in pertinent part:

(a) 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, partner, or any other person with management or control of any partnership, corporation, trust, 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, partner, or any other person with management or control 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, partner, or in any other position with management or control 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.

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

3 (b)] “Manager, administrator, owner, member, officer, director, associate,
4 partner, or any other person with management or control of a license” as used in this
5 section and Section 4308, may refer to a pharmacist or to any other person who serves
6 in such capacity in or for a licensee.

7 . . .

8 **FACTUAL ALLEGATIONS**

9 9. On or about May 12, 2021, the Board received a new wholesaler license application
10 for Aleia Corp, located at Osgood Court in Fremont, California (Fremont location). The officers
11 of Aleia Corp were listed as Claudia Ramondetta as Chief Executive Officer, Respondent Lucien
12 John Ramondetta as President, and Pat D’Angelo (D’Angelo) as Chief Financial Officer. Claudia
13 Ramondetta held 54% ownership and Respondent held 46% ownership of Aleia Corp.

14 10. At the time of Aleia Corp’s new wholesaler license application, D’Angelo held 100%
15 ownership of White House Pharmacy Inc, who owned San Jose Compounding Pharmacy (License
16 No. PHY 54957)¹. During this time, D’Angelo was also listed the sole corporate officer of San
17 Jose Compounding Pharmacy. At this time, San Jose Compounding Pharmacy and D’Angelo
18 were respondents in a pending disciplinary matter before the Board in Case No. 6802.

19 11. On or about October 14, 2021, the Board denied Aleia Corp’s new wholesaler license
20 application based on the pending disciplinary matter against San Jose Compounding Pharmacy.
21 On or about November 9, 2021, the Board withdrew the denial of Aleia Corp’s new wholesaler
22 license application after receiving documentation of D’Angelo’s removal as an officer of Aleia
23 Corp effective October 21, 2021. On or about February 7, 2022, the Board issued Wholesaler
24 License No. WLS 7963 to Aleia Corp.

25 12. In a Decision and Order in Case No. 6802, effective on or about February 7, 2022,
26 San Jose Compounding Pharmacy voluntarily surrendered its license. Pursuant to Business and
27 Professions Code section 4307, D’Angelo was prohibited from applying for any licensure with
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¹ When San Jose Compounding Pharmacy’s license was originally issued on September 30, 2016, Respondent and D’Angelo each had 50% ownership in the pharmacy. Respondent’s 50% ownership was transferred to Pat D’Angelo, and Respondent was removed from the license, effective October 15, 2016.

1 the Board for three years and was also prohibited from serving as a manager, administrator,
2 owner, member, officer, director, associate or partner of a licensee.

3 13. On or about February 1, 2025, Aleia Corp's license status changed to delinquent
4 status due to non-renewal. The license was non-renewable due to its designated representative-
5 in-charge's license expiring on November 1, 2024.²

6 14. On or about April 4, 2025, the Board received a change of location application for
7 Aleia Corp. Respondent certified under penalty of perjury to the truthfulness of all statements,
8 answers, and representations in the application. The new location was listed as US-101 in
9 Soledad, California (Soledad location). An incomplete lease was provided with the application,
10 listing the new location as a "Correctional Training Facility."

11 15. On or about May 1, 2025, a Board inspector attempted to inspect Aleia Corp's current
12 Fremont location. Upon arrival, the Board inspector noted that the business was still there, but an
13 employee indicated that Aleia Corp was in the process of moving to the new Soledad location.
14 The Board inspector did not locate any dangerous drugs or devices at the Fremont location.

15 16. On or about May 5, 2025, the Board received a designated representative-wholesaler
16 license application for Respondent.

17 17. As part of the application review process, the Board obtained Statement of
18 Information filings for Aleia Corp from the California Secretary of State website. On or about
19 September 30, 2024, Aleia Corp filed a Statement of Information adding D'Angelo as Secretary
20 and Chief Financial Officer of Aleia Corp. On or about April 10, 2025, Aleia Corp filed another
21 Statement of Information removing D'Angelo as an officer of Aleia Corp.

22 18. As part of the application review process, the Board requested the following
23 documents from Aleia Corp: a statement signed under penalty of perjury confirming non-
24 operational status of the business beginning November 1, 2024; documentation showing the
25 addition and removal of D'Angelo as an officer of Aleia Corp; and a complete copy of the lease
26 with all exhibits and attachments for the new Soledad location. The Board also noted that Aleia
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28 ² On or about September 18, 2025, Aleia Corp's Wholesaler License No. WLS 7963 was
cancelled pursuant to Code section 4402, subdivision (e), for failure to renew.

1 Corp's application failed to include a licensed designated representative-in-charge. On or about
2 June 30, 2025, August 11, 2025, and September 5, 2025, the Board sent application deficiency
3 notices to Aleia Corp related to these requested items. On or about September 11, 2025, Aleia
4 Corp requested an extension to provide the requested information. Aleia Corp failed to provide
5 the Board with the requested items.

6 19. On or about September 26, 2025, the Board contacted the Department of General
7 Services to obtain a complete copy of Aleia Corp's lease for the new Soledad location. On or
8 about September 29, 2025, the Department of General Services provided the Board with a
9 complete copy of Aleia Corp's lease for the new Soledad location. The lease stated that the
10 premises shall be used "for the purpose of establishing and operating a business engaged in
11 electronic surplus management services. This includes the consignment sales of used surplus
12 electronic equipment and electronic waste (e-waste) collection services, which includes data
13 eradication and routing to approved recyclers." The lease's permitted use did *not* include
14 wholesaler activities.

15 **FIRST CAUSE FOR DENIAL OF APPLICATION**

16 **(Formal Discipline by Board)**

17 20. Respondent's application is subject to denial under Code section 480, subdivision
18 (a)(2), in that on or about October 13, 2025, the Board denied the wholesaler license change of
19 location application for Aleia Corp, where Respondent is a corporate officer and 46% owner, on
20 the grounds of unprofessional conduct in violation of Code sections 4300 and 4301. Aleia Corp
21 submitted an application, signed by Respondent under penalty of perjury, for a new location
22 where the lease's permitted space usage is not for wholesaler operations. In addition, Aleia Corp
23 added D'Angelo, a prohibited individual pursuant to Code section 4307, as a corporate officer
24 between on or about September 30, 2024 through April 10, 2025. Complainant refers to, and by
25 this reference incorporates, the allegations set forth above in paragraphs 9-19, as though set forth
26 fully.

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1 **SECOND CAUSE FOR DENIAL OF APPLICATION**

2 **(Dishonesty, Fraud, or Deceit)**

3 21. Respondent's application is subject to denial under Code sections 4300, subdivision
4 (c), and 475, subdivision (a)(3), in conjunction with Code section 4301, subdivision (f), on the
5 grounds of unprofessional conduct, in that Respondent committed act(s) involving dishonesty
6 fraud, or deceit. Aleia Corp, where Respondent is a corporate officer and 46% owner, submitted
7 an application, signed by Respondent under penalty of perjury, for a new location where the
8 lease's permitted space usage is not for wholesaler operations. Complainant refers to, and by this
9 reference incorporates, the allegations set forth above in paragraphs 9-19, as though set forth
10 fully.

11 **THIRD CAUSE FOR DENIAL OF APPLICATION**

12 **(False Representation)**

13 22. Respondent's application is subject to denial under Code sections 4300, subdivision
14 (c), and 475, subdivision (a)(1), in conjunction with Code section 4301, subdivision (g), on the
15 grounds of unprofessional conduct, in that Respondent knowingly made a false representation.
16 Aleia Corp, where Respondent is a corporate officer and 46% owner, submitted an application,
17 signed by Respondent under penalty of perjury, for a new location where the lease's permitted
18 space usage is not for wholesaler operations. Complainant refers to, and by this reference
19 incorporates, the allegations set forth above in paragraphs 9-19, as though set forth fully.

20 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

21 **(Procurement of License by Fraud or Misrepresentation)**

22 23. Respondent's application is subject to denial under Code sections 4300, subdivision
23 (c), and 475, subdivision (a)(1), in conjunction with Code section 4301, subdivision (a), on the
24 grounds of unprofessional conduct, in that Respondent attempted to procure a license by fraud or
25 misrepresentation. Aleia Corp, where Respondent is a corporate officer and 46% owner,
26 submitted an application, signed by Respondent under penalty of perjury, for a new location
27 where the lease's permitted space usage is not for wholesaler operations. Complainant refers to,
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1 and by this reference incorporates, the allegations set forth above in paragraphs 9-19, as though
2 set forth fully.

3 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

4 **(Action or Conduct Warranting Denial)**

5 24. Respondent's application is subject to denial under Code sections 4300, subdivision
6 (c), and 475, subdivision (a)(4), in conjunction with Code section 4301, subdivision (p), on the
7 grounds of unprofessional conduct, in that Respondent engaged in actions or conduct that would
8 have warranted denial of a license. Aleia Corp, where Respondent is a corporate officer and 46%
9 owner, submitted an application, signed by Respondent under penalty of perjury, for a new
10 location where the lease's permitted space usage is not for wholesaler operations. In addition,
11 Aleia Corp added D'Angelo, a prohibited individual pursuant to Code section 4307, as a
12 corporate officer between on or about September 30, 2024 through April 10, 2025. Complainant
13 refers to, and by this reference incorporates, the allegations set forth above in paragraphs 9-19, as
14 though set forth fully.

15 **SIXTH CAUSE FOR DENIAL OF APPLICATION**

16 **(Unprofessional Conduct)**

17 25. Respondent's application is subject to denial under Code section 4300, subdivision
18 (c), in conjunction with Code section 4301, in that Respondent committed unprofessional
19 conduct. Aleia Corp, where Respondent is a corporate officer and 46% owner, submitted an
20 application, signed by Respondent under penalty of perjury, for a new location where the lease's
21 permitted space usage is not for wholesaler operations. In addition, Respondent added D'Angelo,
22 a prohibited individual pursuant to Code section 4307, as a corporate officer between on or about
23 September 30, 2024 through April 10, 2025. Complainant refers to, and by this reference
24 incorporates, the allegations set forth above in paragraphs 9-19, as though set forth fully.

25 **OTHER MATTERS**

26 26. Pursuant to Code section 4307, if Respondent Lucien John Ramondetta is denied a
27 license or if Respondent Lucien John Ramondetta has been a manager, administrator, owner,
28 member, officer, director, associate, partner, or any other person with management or control of

any partnership, corporation, trust, firm, or association whose application for a license has been denied or revoked, is under suspension or has been placed on probation, Respondent Lucien John Ramondetta shall be prohibited from serving as a manager, administrator, owner, member, officer, director associate, partner, or in any other position with management or control of a licensee for five years if he is placed on probation or, if the license is denied, the prohibition shall continue until the license is issued.

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 application of Lucien John Ramondetta for a Designated Representative-Wholesaler License;
2. Prohibiting Lucien John Ramondetta from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Lucien John Ramondetta is placed on probation or until a license is issued if denied; and
3. Taking such other and further action as deemed necessary and proper.

DATED: 9/7/2026

Sodergren, Digitally signed by
Anne@DCA Sodergren, Anne@DCA
Date: 2026.09.07
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ANNE SODERGREN
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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