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8 **BEFORE THE**
9 **BOARD OF PHARMACY**

10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Statement of Issues
Against:

Case No. 8151

13 **ALEIA CORP**

STATEMENT OF ISSUES

14 **Wholesaler License Change of Location**
15 **Applicant**

16 Respondent.

17
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 April 4, 2025, the Board received an application for a Wholesaler
23 License Change of Location from Aleia Corp (Respondent). On or about February 8, 2025,
24 Claudia Ramondetta and Lucien Ramondetta certified under penalty of perjury to the truthfulness
25 of all statements, answers, and representations in the application. The Board denied the
26 application on October 13, 2025.

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1 **JURISDICTION**

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

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

7 **STATUTORY PROVISIONS**

8 5. Section 475 of the Code states, in pertinent part:

9 (a) Notwithstanding any other provisions of this code, the provisions of this
10 division shall govern the denial of licenses on the grounds of:

11 (1) Knowingly making a false statement of material fact, or knowingly
12 omitting to state a material fact, in an application for a license.

13 . . .

14 (3) Commission of any act involving dishonesty, fraud or deceit with the intent
15 to substantially benefit himself or another, or substantially injure another.

16 (4) Commission of any act which, if done by a licentiate of the business or
17 profession in question, would be grounds for suspension or revocation of license.

18 . . .

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

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

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

24 . . .

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

28 (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.

. . .

7. 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.

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

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

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FACTUAL ALLEGATIONS

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

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

¹ When San Jose Compounding Pharmacy's license was originally issued on September 30, 2016, Lucien Ramondetta and D'Angelo each had 50% ownership in the pharmacy. Lucien Ramondetta's 50% ownership was transferred to Pat D'Angelo, and Lucien Ramondetta was removed from the license, effective October 15, 2016.

1 10. On or about October 14, 2021, the Board denied Respondent's new wholesaler
2 license application based on the pending disciplinary matter against San Jose Compounding
3 Pharmacy. On or about November 9, 2021, the Board withdrew the denial of Respondent's new
4 wholesaler license application after receiving documentation of D'Angelo's removal as an officer
5 of Aleia Corp effective October 21, 2021. On or about February 7, 2022, the Board issued
6 Wholesaler License No. WLS 7963 to Respondent.

7 11. In a Decision and Order in Case No. 6802, effective on or about February 7, 2022,
8 San Jose Compounding Pharmacy voluntarily surrendered its license. Pursuant to Business and
9 Professions Code section 4307, D'Angelo was prohibited from applying for any licensure with
10 the Board for three years and was also prohibited from serving as a manager, administrator,
11 owner, member, officer, director, associate or partner of a licensee.

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

15 13. On or about April 4, 2025, the Board received a change of location application for
16 Respondent. Claudia Ramondetta and Lucien Ramondetta certified under penalty of perjury to
17 the truthfulness of all statements, answers, and representations in the application. The new
18 location was listed as US-101 in Soledad, California (Soledad location). An incomplete lease was
19 provided with the application, listing the new location as a "Correctional Training Facility."

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

25 15. On or about May 5, 2025, the Board received a designated representative-wholesaler
26 license application for Lucien Ramondetta.

27
28 ² On or about September 18, 2025, Respondent's Wholesaler License No. WLS 7963 was
cancelled pursuant to Code section 4402, subdivision (e), for failure to renew.

1 16. As part of the application review process, the Board obtained Statement of
2 Information filings for Respondent from the California Secretary of State website. On or about
3 September 30, 2024, Respondent filed a Statement of Information adding D’Angelo as Secretary
4 and Chief Financial Officer. On or about April 10, 2025, Respondent filed another Statement of
5 Information removing D’Angelo as an officer.

6 17. As part of the application review process, the Board requested the following
7 documents from Respondent: a statement signed under penalty of perjury confirming non-
8 operational status of the business beginning November 1, 2024; documentation showing the
9 addition and removal of D’Angelo as an officer; and a complete copy of the lease with all exhibits
10 and attachments for the new Soledad location. The Board also noted that Respondent’s
11 application failed to include a licensed designated representative-in-charge. On or about June 30,
12 2025, August 11, 2025, and September 5, 2025, the Board sent application deficiency notices to
13 Respondent related to these requested items. On or about September 11, 2025, Respondent
14 requested an extension to provide the requested information. Respondent failed to provide the
15 Board with the requested items.

16 18. On or about September 26, 2025, the Board contacted the Department of General
17 Services to obtain a complete copy of Respondent’s lease for the new Soledad location. On or
18 about September 29, 2025, the Department of General Services provided the Board with a
19 complete copy of Respondent’s lease for the new Soledad location. The lease stated that the
20 premises shall be used “for the purpose of establishing and operating a business engaged in
21 electronic surplus management services. This includes the consignment sales of used surplus
22 electronic equipment and electronic waste (e-waste) collection services, which includes data
23 eradication and routing to approved recyclers.” The lease’s permitted use did *not* include
24 wholesaler activities.

25 **FIRST CAUSE FOR DENIAL OF APPLICATION**

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

27 19. Respondent’s application is subject to denial under Code sections 4300, subdivision
28 (c), and 475, subdivision (a)(3), in conjunction with Code section 4301, subdivision (f), on the

1 grounds of unprofessional conduct, in that Respondent committed act(s) involving dishonesty
2 fraud or deceit by submitting an application under penalty of perjury for a new location where the
3 lease's permitted space usage is not for wholesaler operations. Complainant refers to, and by this
4 reference incorporates, the allegations set forth above in paragraphs 8-18, as though set forth
5 fully.

6 **SECOND CAUSE FOR DENIAL OF APPLICATION**

7 **(False Representation)**

8 20. Respondent's application is subject to denial under Code sections 4300, subdivision
9 (c), and 475, subdivision (a)(1), in conjunction with Code section 4301, subdivision (g), on the
10 grounds of unprofessional conduct, in that Respondent knowingly made a false representation by
11 submitting an application under penalty of perjury for a new location where the lease's permitted
12 space usage is not for wholesaler operations. Complainant refers to, and by this reference
13 incorporates, the allegations set forth above in paragraphs 8-18, as though set forth fully.

14 **THIRD CAUSE FOR DENIAL OF APPLICATION**

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

16 21. Respondent's application is subject to denial under Code sections 4300, subdivision
17 (c), and 475, subdivision (a)(1), in conjunction with Code section 4301, subdivision (a), on the
18 grounds of unprofessional conduct, in that Respondent attempted to procure a license by fraud or
19 misrepresentation by submitting an application under penalty of perjury for a new location where
20 the lease's permitted space usage is not for wholesaler operations. Complainant refers to, and by
21 this reference incorporates, the allegations set forth above in paragraphs 8-18, as though set forth
22 fully.

23 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

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

25 22. Respondent's application is subject to denial under Code sections 4300, subdivision
26 (c), and 475, subdivision (a)(4), in conjunction with Code section 4301, subdivision (p), on the
27 grounds of unprofessional conduct, in that Respondent engaged in actions or conduct that would
28 have warranted denial of a license. Respondent submitted an application under penalty of perjury

1 for a new location where the lease's permitted space usage is not for wholesaler operations. In
2 addition, Respondent added D'Angelo, a prohibited individual pursuant to Code section 4307, as
3 a corporate officer between on or about September 30, 2024 through April 10, 2025.

4 Complainant refers to, and by this reference incorporates, the allegations set forth above in
5 paragraphs 8-18, as though set forth fully.

6 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

7 **(Unprofessional Conduct)**

8 23. Respondent's application is subject to denial under Code section 4300, subdivision
9 (c), in conjunction with Code section 4301, in that Respondent committed unprofessional
10 conduct. Respondent submitted an application under penalty of perjury for a new location where
11 the lease's permitted space usage is not for wholesaler operations. In addition, Respondent added
12 D'Angelo, a prohibited individual pursuant to Code section 4307, as a corporate officer between
13 on or about September 30, 2024 through April 10, 2025. Complainant refers to, and by this
14 reference incorporates, the allegations set forth above in paragraphs 8-18, as though set forth
15 fully.

16 **OTHER MATTERS**

17 24. Pursuant to Code section 4307, if Respondent Aleia Corp is denied a license or if
18 Respondent Aleia Corp has been a manager, administrator, owner, member, officer, director,
19 associate, partner, or any other person with management or control of any partnership,
20 corporation, trust, firm, or association whose application for a license has been denied or revoked,
21 is under suspension or has been placed on probation, Respondent Aleia Corp shall be prohibited
22 from serving as a manager, administrator, owner, member, officer, director associate, partner, or
23 in any other position with management or control of a licensee for five years if a probationary
24 license is issued or, if the license is denied, the prohibition shall continue until the license is
25 issued.

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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 application of Aleia Corp for a Wholesaler License Change of Location;
2. Prohibiting Aleia Corp from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Aleia Corp 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,
Anne@DCA**

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

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