

**BEFORE THE
BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**WALGREENS #04517,
Original Pharmacy Permit No. PHY 53062; and**

**WALGREENS #02445,
Non-Resident Pharmacy Permit No. NRP 1949; and**

**WALGREENS #21147,
Non-Resident Pharmacy Permit No. NRP 2073,**

Respondents

Agency Case No. 6906

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order for Public Repeval is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective at 5:00 p.m. on July 28, 2021.

It is so ORDERED on June 28, 2021.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By

A handwritten signature in black ink, appearing to read "Seung W. Oh". The signature is written in a cursive style with a large initial "S".

Seung W. Oh, Pharm.D.
Board President

1 MATTHEW RODRIQUEZ
Acting Attorney General of California
2 DIANN SOKOLOFF
Supervising Deputy Attorney General
3 ASPASIA A. PAPAVALASSILOU
Deputy Attorney General
4 State Bar No. 196360
1515 Clay Street, 20th Floor
5 P.O. Box 70550
Oakland, CA 94612-0550
6 Telephone: (510) 879-0818
Facsimile: (510) 622-2270
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

13 **WALGREENS #04517**
14 2600 Mowry Ave.
Fremont, CA 94538

15 Original Pharmacy
16 Permit No. PHY 53062,

17 **WALGREENS #02445**
18 8337 S. Park Circle
Orlando, FL 32819

19 Non-Resident Pharmacy
20 Permit No. NRP 1949,

21 and

22 **WALGREENS #21147**
23 2225 S. Price Road
Chandler, AZ 85286

24 Non-Resident Pharmacy
Permit No. NRP 2073

25 Respondents.

Case No. 6906

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER FOR PUBLIC
REPROVAL**

[Bus. & Prof. Code § 495]

26
27 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
28 entitled proceedings that the following matters are true:

1 **PARTIES**

2 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy
3 (Board). She brought this action solely in her official capacity and is represented in this matter by
4 Xavier Becerra, Attorney General of the State of California, by Aspasia A. Papavassiliou, Deputy
5 Attorney General.

6 2. Respondent Walgreens #04517, Respondent Walgreens #02445, and Respondent
7 Walgreens #21147 are represented in this proceeding by attorney Sweta H. Patel, whose address
8 is: Klein, Hockel, Iezza & Patel, P.C., 1981 North Broadway, Suite 220, Walnut Creek, CA
9 94596-3877.

10 **JURISDICTION**

11 3. On or about December 31, 2014, the Board of Pharmacy issued Original Pharmacy
12 Permit Number PHY 53062 to Walgreens #04517 (Respondent Walgreens #04517). The Original
13 Pharmacy Permit was in full force and effect at all times relevant to the charges brought in
14 Accusation No. 6906 and will expire on December 1, 2021, unless renewed.

15 4. On or about March 13, 2017, the Board of Pharmacy issued Non-Resident Pharmacy
16 Permit Number NRP 1949 to Walgreens #02445 (Respondent Walgreens #02445). The Non-
17 Resident Pharmacy Permit was in full force and effect at all times relevant to the charges brought
18 Accusation No. 6906 and will expire on March 1, 2022, unless renewed.

19 5. On or about December 21, 2017, the Board of Pharmacy issued Non-Resident
20 Pharmacy Permit Number NRP 2073 to Walgreens #21147 (Respondent Walgreens #21147).
21 The Non-Resident Pharmacy Permit was in full force and effect at all times relevant to the
22 charges brought in Accusation No. 6906 will expire on December 1, 2021, unless renewed.

23 6. Accusation No. 6906 was filed before the Board of Pharmacy (Board), Department of
24 Consumer Affairs and is currently pending against Respondents. The Accusation and all other
25 statutorily required documents were properly served on Respondents on August 4, 2020.

26 Respondents timely filed their Notice of Defense contesting the Accusation. A copy of
27 Accusation No. 6906 is attached as exhibit A and incorporated by reference.
28

1 **ADVISEMENT AND WAIVERS**

2 7. Respondents have carefully read, fully discussed with counsel, and understand the
3 charges and allegations in Accusation No. 6906. Respondents have also carefully read, fully
4 discussed with counsel, and understand the effects of this Stipulated Settlement and Disciplinary
5 Order for Public Repeval.

6 8. Respondents are fully aware of their legal rights in this matter, including the right to a
7 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
8 their own expense; the right to confront and cross-examine the witnesses against them; the right
9 to present evidence and to testify on their own behalf; the right to the issuance of subpoenas to
10 compel the attendance of witnesses and the production of documents; the right to reconsideration
11 and court review of an adverse decision; and all other rights accorded by the California
12 Administrative Procedure Act and other applicable laws.

13 9. Respondents voluntarily, knowingly, and intelligently waive and give up each and
14 every right set forth above.

15 **CULPABILITY**

16 10. Respondents understand and agree that the charges and allegations in Accusation No.
17 6906, if proven at a hearing, constitute cause for imposing discipline upon their Original Permit
18 and Non-Resident Pharmacy Permits.

19 11. For the purpose of resolving the Accusation without the expense and uncertainty of
20 further proceedings, Respondents agree that, at a hearing, Complainant could establish a factual
21 basis for the charges in the Accusation, and that Respondents hereby give up their right to contest
22 those charges.

23 12. Respondents agree that their Original Permit and Non-Resident Pharmacy Permits are
24 subject to discipline and they agree to be bound by the Disciplinary Order below.

25 13. If, however, a subsequent Accusation is filed against any of the Respondents alleging
26 similar violations as alleged in Accusation No. 6906, then the charges and allegations in
27 Accusation No. 6906 shall be deemed to be true and correct regarding the Respondent(s).

28

1 **RESERVATION**

2 14. The admissions made by Respondents in this stipulation are only for the purposes of
3 this proceeding, or any other proceedings in which the Board or other professional licensing
4 agency is involved, and shall not be admissible in any other criminal or civil proceeding.

5 **CONTINGENCY**

6 15. This stipulation shall be subject to approval by the Board of Pharmacy. Respondents
7 understand and agree that counsel for Complainant and the staff of the Board of Pharmacy may
8 communicate directly with the Board regarding this stipulation and settlement, without notice to
9 or participation by Respondents or their counsel. By signing the stipulation, Respondents
10 understand and agree that they may not withdraw their agreement or seek to rescind the
11 stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this
12 stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order for Public
13 Repeval shall be of no force or effect, except for this paragraph, it shall be inadmissible in any
14 legal action between the parties, and the Board shall not be disqualified from further action by
15 having considered this matter.

16 16. The parties understand and agree that Portable Document Format (PDF) and facsimile
17 copies of this Stipulated Settlement and Disciplinary Order for Public Repeval, including PDF
18 and facsimile signatures thereto, shall have the same force and effect as the originals.

19 17. This Stipulated Settlement and Disciplinary Order for Public Repeval is intended by
20 the parties to be an integrated writing representing the complete, final, and exclusive embodiment
21 of their agreement. It supersedes any and all prior or contemporaneous agreements,
22 understandings, discussions, negotiations, and commitments (written or oral). This Stipulated
23 Settlement and Disciplinary Order for Public Repeval may not be altered, amended, modified,
24 supplemented, or otherwise changed except by a writing executed by an authorized representative
25 of each of the parties.

26 18. In consideration of the foregoing admissions and stipulations, the parties agree that
27 the Board may, without further notice or formal proceeding, issue and enter the following
28 Disciplinary Order:

1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Original Permit No. PHY 53062 issued to Respondent
3 Walgreens #04517, Non-Residency Pharmacy Permit No. 1949 issued to Respondent Walgreens
4 #02445, and Non-Resident Pharmacy Permit No. 2073 issued to Respondent Walgreens #21147,
5 shall be publicly reprovved by the Board of Pharmacy under Business and Professions Code
6 section 495 in resolution of Accusation No. 6906, attached as exhibit A.

7 **Cost Recovery.** Respondents shall pay, jointly and severally, a total of \$6,928.75 to the
8 Board for its costs associated with the investigation and enforcement of this matter. Respondent
9 shall be permitted to pay these costs in a payment plan approved by the Board. If Respondent
10 fails to pay the Board costs as ordered, Respondent shall not be allowed to renew their Original
11 Permit and Non-Resident Pharmacy Permits until Respondent pays costs in full.

12 **Full Compliance.** As a resolution of the charges in Accusation No. 6906, this stipulated
13 settlement is contingent upon Respondent’s full compliance with all conditions of this Order. If
14 Respondent fails to satisfy any of these conditions, such failure to comply constitutes cause for
15 discipline, including outright revocation, of Original Permit No. PHY 53062 issued to
16 Respondent Walgreens #04517, Non-Residency Pharmacy Permit No. 1949 issued to Respondent
17 Walgreens #02445, and Non-Resident Pharmacy Permit No. 2073 issued to Respondent
18 Walgreens #21147.

19 **ACCEPTANCE**

20 I have carefully read the above Stipulated Settlement and Disciplinary Order for Public
21 Reapproval and have fully discussed it with attorney Sweta H. Patel. I am authorized to sign for
22 Respondents Walgreens #04517, Walgreens #02445, and Walgreens # 21147 and I understand the
23 stipulation and the effect it will have on their Original Permit and Non-Resident Pharmacy
24 Permits. On behalf of the Respondents, I enter into this Stipulated Settlement and Disciplinary

25 ///

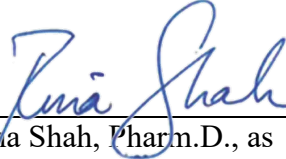
26 ///

27 ///

28

1 Order for Public Repeval voluntarily, knowingly, and intelligently, and agree to be bound by the
2 Decision and Order of the Board of Pharmacy.

3
4 DATED: 3/24/2021


Rina Shah, Pharm.D., as
Vice President, Pharmacy Operations, for:
WALGREENS #04517
WALGREENS #02445
WALGREENS #21147
Respondents

5
6
7
8
9 I have read and fully discussed with an authorized representative of Respondent Walgreens
10 #04517, Respondent Walgreens #02445, and Respondent Walgreens #21147, the terms and
11 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order
12 for Public Repeval. I approve its form and content.

13
14 DATED: March 25, 2021


SWETA H. PATEL
Attorney for Respondents

15
16
17 **ENDORSEMENT**

18 The foregoing Stipulated Settlement and Disciplinary Order for Public Repeval is hereby
19 respectfully submitted for consideration by the Board of Pharmacy of the Department of
20 Consumer Affairs.

21 DATED: March 26, 2021

22 Respectfully submitted,
23 XAVIER BECERRA
Attorney General of California
24 DIANN SOKOLOFF
Supervising Deputy Attorney General

25
26 
27 ASPASIA A. PAPA VASSILIOU
Deputy Attorney General
Attorneys for Complainant

28 OK2020900061 91349308.docx

Exhibit A

Accusation No. 6906

1 XAVIER BECERRA
Attorney General of California
2 DIANN SOKOLOFF
Supervising Deputy Attorney General
3 ASPASIA A. PAPAVALASSILOU
Deputy Attorney General
4 State Bar No. 196360
1515 Clay Street, 20th Floor
5 P.O. Box 70550
Oakland, CA 94612-0550
6 Telephone: (510) 879-0818
Facsimile: (510) 622-2270
7 E-mail: Aspasia.Papavassiliou@doj.ca.gov
Attorneys for Complainant

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

13 In the Matter of the Accusation Against:

Case No. 6906

14 **WALGREENS #04517**
2600 Mowry Ave.
15 Fremont, CA 94538

ACCUSATION

16 Original Pharmacy
Permit No. PHY 53062,

17 **WALGREENS #02445**
8337 S. Park Circle
18 Orlando, FL 32819

19 Non-Resident Pharmacy
20 Permit No. NRP 1949,

21 **and**

22 **WALGREENS #21147**
2225 S. Price Road
23 Chandler, AZ 85286

24 Non-Resident Pharmacy
25 Permit No. NRP 2073

26 **Respondents.**

1 **PARTIES**

2 1. Anne Sodergren (Complainant) brings this Accusation solely in her official capacity
3 as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.

4 2. On or about December 31, 2014, the Board of Pharmacy issued Original Pharmacy
5 Permit Number PHY 53062 to Walgreens #04517 (Respondent Walgreens #04517). The Original
6 Pharmacy Permit was in full force and effect at all times relevant to the charges brought in this
7 Accusation and will expire on December 1, 2020, unless renewed.

8 3. On or about March 13, 2017, the Board of Pharmacy issued Non-Resident Pharmacy
9 Permit Number NRP 1949 to Walgreens #02445 (Respondent Walgreens #02445). The Non-
10 Resident Pharmacy Permit was in full force and effect at all times relevant to the charges brought
11 in this Accusation and will expire on March 1, 2021, unless renewed.

12 4. On or about December 21, 2017, the Board of Pharmacy issued Non-Resident
13 Pharmacy Permit Number NRP 2073 to Walgreens #21147 (Respondent Walgreens #21147).
14 The Non-Resident Pharmacy Permit was in full force and effect at all times relevant to the
15 charges brought in this Accusation will expire on December 1, 2020, unless renewed.

16 **JURISDICTION**

17 5. This Accusation is brought before the Board of Pharmacy (Board), Department of
18 Consumer Affairs, under the authority of the following laws. All section references are to the
19 Business and Professions Code (Code) unless otherwise indicated.

20 6. Section 4300 of the Code states, in pertinent part:

21 (a) Every license issued may be suspended or revoked.

22 (b) The board shall discipline the holder of any license issued by the board,
23 whose default has been entered or whose case has been heard by the board and found
guilty, by any of the following methods:

24 (1) Suspending judgment.

25 (2) Placing him or her upon probation.

26 (3) Suspending his or her right to practice for a period not exceeding one year.

27 (4) Revoking his or her license.

28 (5) Taking any other action in relation to disciplining him or her as the board in

1 its discretion may deem proper.

2 ...

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

8 7. Section 4300.1 of the Code states:

9 The expiration, cancellation, forfeiture, or suspension of a board-issued license
10 by operation of law or by order or decision of the board or a court of law, the
11 placement of a license on a retired status, or the voluntary surrender of a license by a
12 licensee shall not deprive the board of jurisdiction to commence or proceed with any
13 investigation of, or action or disciplinary proceeding against, the licensee or to render
14 a decision suspending or revoking the license.

15 **STATUTORY PROVISIONS**

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

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

20 ...

21 (d) The clearly excessive furnishing of controlled substances in violation of
22 subdivision (a) of Section 11153 of the Health and Safety Code.

23 ...

24 (o) Violating or attempting to violate, directly or indirectly, or assisting in or
25 abetting the violation of or conspiring to violate any provision or term of this chapter
26 or of the applicable federal and state laws and regulations governing pharmacy,
27 including regulations established by the board or by any other state or federal
28 regulatory agency.

9. Section 11153 of the Health and Safety Code states, in pertinent part:

(a) A prescription for a controlled substance shall only be issued for a
legitimate medical purpose by an individual practitioner acting in the usual course of
his or her professional practice. The responsibility for the proper prescribing and
dispensing of controlled substances is upon the prescribing practitioner, but a
corresponding responsibility rests with the pharmacist who fills the prescription.
Except as authorized by this division, the following are not legal prescriptions: (1) an
order purporting to be a prescription which is issued not in the usual course of
professional treatment or in legitimate and authorized research....

1 **REGULATORY PROVISIONS**

2 10. California Code of Regulations, title 16, section 1761, states:

3 (a) No pharmacist shall compound or dispense any prescription which contains
4 any significant error, omission, irregularity, uncertainty, ambiguity or alteration.
5 Upon receipt of any such prescription, the pharmacist shall contact the prescriber to
6 obtain the information needed to validate the prescription.

7 (b) Even after conferring with the prescriber, a pharmacist shall not compound
8 or dispense a controlled substance prescription where the pharmacist knows or has
9 objective reason to know that said prescription was not issued for a legitimate
10 medical purpose.

11 **COST RECOVERY**

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

16 **DRUGS**

17 12. Eszopiclone, also known by the brand name Lunesta, is used to treat insomnia. It is a
18 dangerous drug per Business and Professions Code section 4022 and a Scheduled IV controlled
19 substance per Code of Federal Regulations, title 21, section 1308.14, subdivision (c)(55). The
20 maximum dose is 3 mg in a 24-hour period.

21 13. Zolpidem, also known by the brand name Ambien, is used to treat insomnia. It is a
22 dangerous drug per Business and Professions Code section 4022 and a Schedule IV controlled
23 substance per Health and Safety Code section 11057, subdivision (d)(32). The maximum dose is
24 10 mg in a 24-hour period. Zolpidem should be limited to short-term use, as long-term use can
25 result in dependence, abuse, or tolerance.

26 **FACTUAL BACKGROUND**

27 14. From on or about November 19, 2017, to on or about May 15, 2019, at the Walgreens
28 #04517 pharmacy in Fremont, California, Respondents dispensed eszopiclone and zolpidem to
patient L.O. on the below listed occasions.

A. On or about November 19, 2017, Respondents dispensed 30 tablets of 3 mg
eszopiclone pursuant to Prescription No. 3348061;

1 B. On or about November 22, 2017, Respondents dispensed 30 tablets of 10 mg
2 zolpidem pursuant to Prescription No. 3351125;

3 C. On or about December 31, 2017, Respondents dispensed 20 tablets of 5 mg zolpidem
4 pursuant to Prescription No. 3379983;

5 D. On or about January 8, 2018, Respondents dispensed 30 tablets of 10 mg zolpidem
6 pursuant to Prescription No. 3386036;

7 E. On or about February 9, 2018, Respondents dispensed 30 tablets of 10 mg zolpidem
8 pursuant to Prescription No. 3411616;

9 F. On or about February 28, 2018, Respondents dispensed 30 tablets of 10 mg zolpidem
10 pursuant to Prescription No. 3425704;

11 G. On or about March 14, 2018, Respondents dispensed 10 tablets of 3 mg eszopiclone
12 pursuant to Prescription No. 3436166;

13 H. On or about May 10, 2018, Respondents dispensed 30 tablets of 10 mg zolpidem
14 pursuant to Prescription No. 3476954;

15 I. On or about June 9, 2018, Respondents dispensed 10 tablets of 3 mg eszopiclone
16 pursuant to Prescription No. 3497963;

17 J. On or about June 23, 2018, Respondents dispensed 30 tablets of 10 mg zolpidem
18 pursuant to Prescription No. 3506988; and

19 K. On or about May 15, 2019, Respondents dispensed 30 tablets of 3 mg eszopiclone
20 pursuant to Prescription No. 3726027.

21 15. Respondents dispensed the above prescriptions despite several red flags or factors of
22 irregularity. L.O. obtained prescriptions for eszopiclone and zolpidem from multiple prescribers
23 and filled them at various Walgreens Pharmacy locations. Furthermore, L.O. mostly received
24 prescriptions for the highest doses of two drugs that are generally used for the same purpose and
25 considered duplicate therapy. L.O. also obtained multiple early refills and/or was filling the two
26 medications in close succession to one another. Finally, L.O. paid for the majority of the
27 prescriptions by using cash or a discount card. The pharmacists at Walgreens #04517 failed to
28 appropriately scrutinize L.O.'s patient profile and recognize the aforementioned factors of

1 irregularity

2 16. Respondents Walgreens #02445 and #21147 contributed to the improper dispensing
3 of the prescriptions by having a multi-step verification process where multiple pharmacists were
4 involved in the dispensing of one controlled substance prescription. Moreover, the Drug
5 Utilization Review (DUR) pharmacists at Walgreens #02445 and #21147 were not licensed in
6 California, and thus did not have access to CURES, but Walgreens #02445 and #2117 required
7 those pharmacists to participate in the verification process of controlled substances, even though
8 the pharmacists were unable to determine whether patients were doctor or pharmacy shopping or
9 obtaining early fills of their controlled substances at pharmacies other than Walgreens.

10 **FIRST CAUSE FOR CAUSE FOR DISCIPLINE**

11 **(Unprofessional Conduct: Clearly Excessive Furnishing of Controlled Substances)**

12 17. Respondents Walgreens #04517, Walgreens #02445, and Walgreens #21147, are
13 subject to disciplinary action for unprofessional conduct under Code section 4301, subdivision
14 (d), due to excessive furnishing of controlled substances in violation of Health and Safety Code
15 section 11153. The circumstances are set forth in paragraphs 14-16, above.

16 **SECOND CAUSE FOR DISCIPLINE**

17 **(Unprofessional Conduct: Violation of Regulation--Erroneous or Uncertain Prescriptions)**

18 18. Respondents Walgreens #04517, Walgreens #02445, and Walgreens #21147, are
19 subject to disciplinary action for unprofessional conduct under Code section 4301, subdivision
20 (o), due to violation of a Board regulation. Specifically, Respondents violated California Code of
21 Regulations, title 16, section 1761, in that they dispensed erroneous or uncertain prescriptions.
22 The circumstances are set forth in paragraphs 14-16, above.

23 **DISCIPLINARY CONSIDERATIONS**

24 19. As disciplinary considerations, Respondent further alleges that Walgreens #04517 has
25 been the subject of a Board citation and a public reproof, as described below.

26 A. On or about July 16, 2018, the Board issued Citation No. CI 2017 77833, now final,
27 to Respondent Walgreens #04517 for violation from a prescription in violation of California Code
28 of Regulations, title 16, section 1716. This citation did not impose a fine, but the same

1 prescription variation incident previously led to the issuance of Citation No. CI 2016 74001 on or
2 about January 16, 2018, against Respondent Walgreens #02445, and that citation required
3 payment of a \$1,500.00 fine, which was paid.

4 B. In a final Board decision and order effective on or about July 25, 2019, Respondent
5 Walgreens #04517 was publicly reprovved under Business and Professions Code section 495, in
6 resolution of Accusation No. 6325. The Accusation alleged that Respondent Walgreens #04517
7 permitted an unlicensed person to act as a pharmacist, failed to place a Pharmacist-in-Charge in
8 charge of the pharmacy, dispensed medication pursuant to non-compliant prescriptions, failed to
9 provide records, and failed to identify a licensed pharmacist to verify prescriptions.

10 **PRAYER**

11 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this
12 Accusation, and that following the hearing, the Board of Pharmacy issue a decision:

- 13 1. Revoking or suspending Original Pharmacy Permit Number PHY 53062, issued to
14 Walgreens #04517;
- 15 2. Revoking or suspending Non-Resident Pharmacy Permit Number NRP 1949, issued
16 to Walgreens #02445;
- 17 3. Revoking or suspending Non-Resident Pharmacy Permit Number NRP 2073, issued
18 to Walgreens #21147;
- 19 4. Ordering Walgreens #04517, Walgreens #02445 and Walgreens #21147 to pay the
20 Board of Pharmacy the reasonable costs of the investigation and enforcement of this case,
21 pursuant to Business and Professions Code section 125.3; and,
- 22 5. Taking such other and further action as deemed necessary and proper.

23
24 DATED: July 29, 2020 _____

Anne Sodergren

25 ANNE SODERGREN
26 Executive Officer
27 Board of Pharmacy
28 Department of Consumer Affairs
State of California
Complainant

OK2020900061 91244997.docx