

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

In the Matter of the Accusation Against:

Case No. 4235

**SUN PO NG  
1710 Main Street  
Susanville, CA 96130**

**Pharmacist License No. RPH 44737**

Respondent.

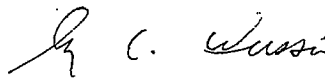
**DECISION AND ORDER**

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

This decision shall become effective on August 21, 2013.

It is so ORDERED on July 22, 2013.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA



By

\_\_\_\_\_  
STANLEY C. WEISSER  
Board President

1 KAMALA D. HARRIS  
Attorney General of California  
2 FRANK H. PACOE  
Supervising Deputy Attorney General  
3 JOSHUA A. ROOM  
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*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**BOARD OF PHARMACY**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 4235

11 **SUN PO NG**  
12 **1710 Main Street**  
13 **Susanville, CA 96130**

**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER**

14 **Pharmacist License No. RPH 44737**

15 Respondent.

16 In the interest of a prompt and speedy settlement of this matter, consistent with the public  
17 interest and the responsibility of the Board of Pharmacy of the Department of Consumer Affairs,  
18 the parties hereby agree to the following Stipulated Settlement and Disciplinary Order which will  
19 be submitted to the Board for approval and adoption as the final disposition of the Accusation.

20 PARTIES

21 1. Virginia Herold (Complainant) is the Executive Officer of the Board of Pharmacy.  
22 She brought this action solely in her official capacity and is represented in this matter by Kamala  
23 D. Harris, Attorney General of the State of California, by Joshua A. Room, Supervising Deputy  
24 Attorney General.

25 2. Sun Po Ng (Respondent) is represented in this proceeding by attorney Deborah L.  
26 Phillips, Esq., whose address is: Nurse Attorney, 5424-10 Sunol Boulevard, Suite 254,  
27 Pleasanton, CA 94566 (telephone (925) 426-6020).

28 ///





1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Pharmacist License No. RPH 44737, issued to Sun Po Ng  
3 (Respondent), is revoked. However, the revocation is stayed and Respondent is placed on  
4 probation for four (4) years on the following terms and conditions.

5 **1. Obey All Laws**

6 Respondent shall obey all state and federal laws and regulations.

7 Respondent shall report any of the following occurrences to the board, in writing, within  
8 seventy-two (72) hours of such occurrence:

- 9 • an arrest or issuance of a criminal complaint for violation of any provision of the  
10 Pharmacy Law, state and federal food and drug laws, or state and federal controlled  
11 substances laws  
12 • a plea of guilty or nolo contendere in any state or federal criminal proceeding to any  
13 criminal complaint, information or indictment  
14 • a conviction of any crime  
15 • discipline, citation, or other administrative action filed by any state or federal agency  
16 which involves respondent's pharmacist license or which is related to the practice of  
17 pharmacy or the manufacturing, obtaining, handling, distributing, billing, or charging  
18 for any drug, device or controlled substance.

19 Failure to timely report such occurrence shall be considered a violation of probation.

20 **2. Report to the Board**

21 Respondent shall report to the board quarterly, on a schedule as directed by the board or its  
22 designee. The report shall be made either in person or in writing, as directed. Among other  
23 requirements, respondent shall state in each report under penalty of perjury whether there has  
24 been compliance with all the terms and conditions of probation. Failure to submit timely reports  
25 in a form as directed shall be considered a violation of probation. Any period(s) of delinquency  
26 in submission of reports as directed may be added to the total period of probation. Moreover, if  
27 the final probation report is not made as directed, probation shall be automatically extended until  
28 such time as the final report is made and accepted by the board.

1           3.     **Interview with the Board**

2           Upon receipt of reasonable prior notice, respondent shall appear in person for interviews  
3 with the board or its designee, at such intervals and locations as are determined by the board or its  
4 designee. Failure to appear for any scheduled interview without prior notification to board staff,  
5 or failure to appear for two (2) or more scheduled interviews with the board or its designee during  
6 the period of probation, shall be considered a violation of probation.

7           4.     **Cooperate with Board Staff**

8           Respondent shall cooperate with the board's inspection program and with the board's  
9 monitoring and investigation of respondent's compliance with the terms and conditions of her  
10 probation. Failure to cooperate shall be considered a violation of probation.

11          5.     **Continuing Education**

12          Respondent shall provide evidence of efforts to maintain skill and knowledge as a  
13 pharmacist as directed by the board or its designee.

14          6.     **Notice to Employers**

15          During the period of probation, respondent shall notify all present and prospective  
16 employers of the decision in case number 4235 and the terms, conditions and restrictions imposed  
17 on respondent by the decision, as follows:

18           Within thirty (30) days of the effective date of this decision, and within fifteen (15) days of  
19 undertaking any new employment, respondent shall cause her direct supervisor, pharmacist-in-  
20 charge (including each new pharmacist-in-charge during respondent's tenure of employment) and  
21 owner to report to the board in writing acknowledging that the individual(s) has/have read the  
22 decision in case number 4235, and terms and conditions imposed thereby. It shall be  
23 respondent's responsibility to ensure that her employer(s) and/or supervisor(s) submit timely  
24 acknowledgment(s) to the board. If respondent works for or is employed by or through a  
25 pharmacy employment service, respondent must notify her direct supervisor, pharmacist-in-  
26 charge, and owner at every entity licensed by the board of the terms and conditions of the  
27 decision in case number 4235 in advance of commencing work at each licensed entity. A record  
28 of this notification must be provided to the board upon request.

1 Furthermore, within thirty (30) days of the effective date of this decision, and within fifteen  
2 (15) days of respondent undertaking any new employment by or through a pharmacy employment  
3 service, respondent shall cause her direct supervisor with the pharmacy employment service to  
4 report to the board in writing acknowledging that she has read the decision in case number 4235  
5 and the terms and conditions imposed thereby. It shall be respondent's responsibility to ensure  
6 that her employer(s) and/or supervisor(s) submit timely acknowledgment(s) to the board.

7 Failure to timely notify present or prospective employer(s) or to cause employer(s) to  
8 submit timely acknowledgments to the board shall be considered a violation of probation.

9 "Employment" within the meaning of this provision shall include any full-time,  
10 part-time, temporary, relief or pharmacy management service as a pharmacist or any  
11 position for which a pharmacist license is a requirement or criterion for employment,  
12 whether the respondent is an employee, independent contractor or volunteer.

13 **7. No Supervision of Interns, Serving as Pharmacist-in-Charge (PIC), Serving as**  
14 **Designated Representative-in-Charge, or Serving as a Consultant**

15 During the period of probation, respondent shall not supervise any intern pharmacist, be the  
16 pharmacist-in-charge or designated representative-in-charge of any entity licensed by the board,  
17 nor serve as a consultant. Assumption of any such unauthorized supervision responsibilities shall  
18 be considered a violation of probation.

19 **8. Reimbursement of Board Costs**

20 As a condition precedent to successful completion of probation, respondent shall pay to the  
21 board its costs of investigation and prosecution in the amount of \$5,000,00. Respondent shall be  
22 permitted to pay these costs in a payment plan approved by the board or its designee, so long as  
23 full payment is made within forty-two (42) months of the effective date of this decision. There is  
24 to be no deviation from this schedule absent prior written approval by the board or its designee.  
25 Failure to pay costs by the deadline(s) as directed shall be considered a violation of probation.

26 The filing of bankruptcy by respondent shall not relieve respondent of her responsibility to  
27 reimburse the board its costs of investigation and prosecution.

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1           **9. Probation Monitoring Costs**

2           Respondent shall pay any costs associated with probation monitoring as determined by the  
3 board each and every year of probation. Such costs shall be payable to the board on a schedule as  
4 directed by the board or its designee. Failure to pay such costs by the deadline(s) as directed shall  
5 be considered a violation of probation.

6           **10. Status of License**

7           Respondent shall, at all times while on probation, maintain an active, current license with  
8 the board, including any period during which suspension or probation is tolled. Failure to  
9 maintain an active, current license shall be considered a violation of probation.

10           If respondent's license expires or is cancelled by operation of law or otherwise at any time  
11 during the period of probation, including any extensions thereof due to tolling or otherwise, upon  
12 renewal or reapplication respondent's license shall be subject to all terms and conditions of this  
13 probation not previously satisfied.

14           **11. Employment Requirement: Tolling of Probation**

15           Except during periods of suspension, Respondent shall, at all times while on probation, be  
16 employed as a pharmacist in California for a minimum of forty (40) hours per calendar month.  
17 Any month during which this minimum is not met tolls the period of probation, i.e., the period of  
18 probation is extended by one month for each month in which the minimum is not met. During  
19 any such period of tolling, Respondent must comply with all terms and conditions of probation.

20           Should Respondent, regardless of residency, for any reason (including vacation) cease  
21 practicing as a pharmacist for a minimum of forty (40) hours per calendar month in California,  
22 Respondent must notify the board in writing within ten (10) days of the cessation of practice, and  
23 must further notify the board in writing within ten (10) days of the resumption of practice. Any  
24 failure to provide such notification(s) shall be considered a violation of probation.

25           It is a violation of probation for Respondent's probation to remain tolled pursuant to the  
26 provisions of this condition for a total period, counting consecutive and non-consecutive months  
27 or smaller time periods, exceeding thirty-six (36) months.

28           ///



1 "Cessation of practice" means any calendar month during which Respondent is  
2 not practicing as a pharmacist as defined by Business and Professions Code section  
3 4000 et seq. for at least forty (40) hours. "Resumption of practice" means any  
4 calendar month during which Respondent is practicing as a pharmacist as defined by  
5 Business and Professions Code section 4000 et seq. for at least forty (40) hours.

6 **12. Notification of Change in Employment, Name, Address(es), or Phone(s)**

7 Respondent shall notify the board in writing within ten (10) days of any change of  
8 employment. Said notification shall include the reasons for leaving, the address of the new  
9 employer, the name of the supervisor and owner, and the work schedule if known. Respondent  
10 shall further notify the board in writing within ten (10) days of a change in name, residence  
11 address, mailing address, or phone number.

12 Failure to timely notify the board of any change in employer(s), name(s), address(es), or  
13 phone number(s) shall be considered a violation of probation.

14 **13. No Ownership of Licensed Premises**

15 Respondent shall not own, have any legal or beneficial interest in, or serve as a manager,  
16 administrator, member, officer, director, trustee, associate, or partner of any business, firm,  
17 partnership, or corporation currently or hereinafter licensed by the board. Respondent shall sell  
18 or transfer any legal or beneficial interest in any entity licensed by the board within ninety (90)  
19 days following the effective date of this decision and shall immediately thereafter provide written  
20 proof thereof to the board. Failure to timely divest any legal or beneficial interest(s) or provide  
21 documentation thereof shall be considered a violation of probation.

22 **14. Supervised Practice**

23 During the period of probation, respondent shall practice only under the supervision of a  
24 licensed pharmacist not on probation with the board. Upon and after the effective date of this  
25 decision, respondent shall not practice pharmacy and her license shall be automatically suspended  
26 until a supervisor is approved by the board or its designee. The supervision shall be, as required  
27 by the board or its designee, either:

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1 Continuous – At least 75% of a work week

2 Substantial - At least 50% of a work week

3 Partial - At least 25% of a work week

4 Daily Review - Supervisor's review of probationer's daily activities within 24 hours

5 Within thirty (30) days of the effective date of this decision, respondent shall have her  
6 supervisor submit notification to the board in writing stating that the supervisor has read the  
7 decision in case number 4235 and is familiar with the required level of supervision as determined  
8 by the board or its designee. It shall be the respondent's responsibility to ensure that her  
9 employer(s), pharmacist-in-charge and/or supervisor(s) submit timely acknowledgement(s) to the  
10 board. Failure to cause the direct supervisor and the pharmacist-in-charge to submit timely  
11 acknowledgements to the board shall be considered a violation of probation.

12 If respondent changes employment, it shall be the respondent's responsibility to ensure that  
13 her employer(s), pharmacist-in-charge and/or supervisor(s) submit timely acknowledgement(s) to  
14 the board. Respondent shall have her new supervisor, within fifteen (15) days after employment  
15 commences, submit notification to the board in writing stating the direct supervisor and  
16 pharmacist-in-charge have read the decision in case number 4235 and is familiar with the level of  
17 supervision as determined by the board. Respondent shall not practice pharmacy and her license  
18 shall be automatically suspended until the board or its designee approves a new supervisor.  
19 Failure to cause the direct supervisor and the pharmacist-in-charge to submit timely  
20 acknowledgements to the board shall be considered a violation of probation.

21 During any such suspension, respondent shall not enter any pharmacy area or any portion of  
22 the licensed premises of a wholesaler, veterinary food-animal drug retailer or any other distributor  
23 of drugs which is licensed by the board, or any manufacturer, or where dangerous drugs and  
24 devices or controlled substances are maintained. Respondent shall not practice pharmacy nor do  
25 any act involving drug selection, selection of stock, manufacturing, compounding, dispensing or  
26 patient consultation; nor shall respondent manage, administer, or be a consultant to any licensee  
27 of the board, or have access to or control the ordering, manufacturing or dispensing of dangerous  
28 drugs or controlled substances. Respondent shall not resume practice until notified by the board.

1 During any such suspension, respondent shall not engage in any activity that requires the  
2 professional judgment of a pharmacist. Respondent shall not direct or control any aspect of the  
3 practice of pharmacy. Respondent shall not perform the duties of a pharmacy technician or a  
4 designated representative for any entity licensed by the board.

5 Failure to comply with this suspension shall be considered a violation of probation.

6 **15. Ethics Course**

7 Within sixty (60) calendar days of the effective date of this decision, respondent shall enroll  
8 in a course in ethics, at respondent's expense, approved in advance by the board or its designee.  
9 Failure to initiate the course during the first year of probation, and complete it within the second  
10 year of probation, is a violation of probation.

11 Respondent shall submit a certificate of completion to the board or its designee within five  
12 days after completing the course.

13 **16. License Surrender While on Probation/Suspension**

14 Following the effective date of this decision, should respondent cease practice due to  
15 retirement or health, or be otherwise unable to satisfy the terms and conditions of probation,  
16 respondent may tender her license to the board for surrender. The board or its designee shall have  
17 the discretion whether to grant the request for surrender or take any other action it deems  
18 appropriate and reasonable. Upon formal acceptance of the surrender of the license, respondent  
19 will no longer be subject to the terms and conditions of probation. Such surrender constitutes a  
20 record of discipline and shall become a part of respondent's license history with the board.

21 Upon acceptance of the surrender, respondent shall relinquish her pocket and wall license to  
22 the board within ten (10) days of notification by the board the surrender is accepted. Respondent  
23 may not reapply for any license from the board for three (3) years from the effective date of the  
24 surrender. Respondent shall meet all requirements applicable to the license sought as of the date  
25 the application for that license is submitted to the board, including any outstanding costs.

26 **17. Completion of Probation**

27 Upon written notice by the board or its designee indicating successful completion of  
28 probation, respondent's license will be fully restored.

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18. **Violation of Probation**

If respondent has not complied with any term or condition of probation, the board shall have continuing jurisdiction over respondent, and probation shall automatically be extended, until all terms and conditions have been satisfied or the board has taken other action as deemed appropriate to treat the failure to comply as a violation of probation, to terminate probation, and to impose the penalty that was stayed.

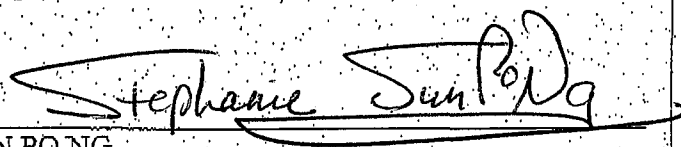
If respondent violates probation in any respect, the board, after giving respondent notice and an opportunity to be heard, may revoke probation and carry out the disciplinary order that was stayed. If a petition to revoke probation or an accusation is filed against respondent during probation, the board shall have continuing jurisdiction and the period of probation shall be automatically extended until the petition to revoke probation or accusation is heard and decided.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Deborah L. Phillips, Esq.. I understand the stipulation and the effect it will have on my Pharmacist License. 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 Board of Pharmacy.

DATED:

5/24/2013

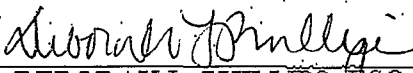


SUN PO NG  
Respondent

I have read and fully discussed with Respondent Sun Po Ng the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED:

May 25, 2013



DEBORAH L. PHILLIPS, ESQ.  
Attorney for Respondent

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ENDORSEMENT

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

Dated: 6/3/2013

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
FRANK H. PACOE  
Supervising Deputy Attorney General



JOSHUA A. ROOM  
Supervising Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 4235**

1 KAMALA D. HARRIS  
Attorney General of California  
2 FRANK H. PACOE  
Supervising Deputy Attorney General  
3 JOSHUA A. ROOM  
Deputy Attorney General  
4 State Bar No. 214663  
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**STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 4235

11 **SUN PO NG**  
12 **508 Connecticut Street**  
13 **San Francisco, CA 94107**

**A C C U S A T I O N**

14 **Pharmacist License No. RPH 44737**

15 Respondent.

16 Complainant alleges:

17 PARTIES

- 18 1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity  
19 as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.  
20 2. On or about August 20, 1991, the Board of Pharmacy issued Pharmacist License No.  
21 RPH 44737 to Sun Po Ng (Respondent). The License was in full force and effect at all times  
22 relevant to the charges brought herein and will expire on January 31, 2013, unless renewed.  
23

24 JURISDICTION

- 25 3. This Accusation is brought before the Board of Pharmacy (Board), Department of  
26 Consumer Affairs, under the authority of the following laws. All section references are to the  
27 Business and Professions Code (Code) unless otherwise indicated.

28 ///





1 COST RECOVERY

2 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
3 administrative law judge to direct a licentiate found to have committed a violation of the licensing  
4 act to pay a sum not to exceed its reasonable costs of investigation and enforcement.

5  
6 DANGEROUS DRUGS

7 10. Section 4022 of the Code states, in pertinent part:

8 “‘Dangerous drug’ or ‘dangerous device’ means any drug or device unsafe for self use,  
9 except veterinary drugs that are labeled as such, and includes the following:

10 “(a) Any drug that bears the legend: ‘Caution: federal law prohibits dispensing without  
11 prescription,’ ‘Rx only,’ or words of similar import.

12 ...  
13 “(c) Any other drug or device that by federal or state law can be lawfully dispensed only on  
14 prescription or furnished pursuant to Section 4006.”

15 11. **Viagra** is a brand name for **sildenafil**, a dangerous drug as designated by Business  
16 and Professions Code section 4022. It is an erectile-dysfunction treatment drug.

17 12. **Cialis** is a brand name for **tadalafil**, a dangerous drug as designated by Business and  
18 Professions Code section 4022. It is an erectile-dysfunction treatment drug.

19  
20 FACTUAL BACKGROUND

21 13. From an unknown start date until on or about May 14, 2011, Respondent worked as a  
22 pharmacist at Kaiser Outpatient Hospital Pharmacy No. 123 (PHY 40896) in Richmond, CA.

23 14. During the tenure of her employment, Respondent used the access afforded by her  
24 employment and licensure to divert/steal, or attempt to divert/steal, dangerous drugs, including  
25 **Viagra/sildenafil**, and/or **Cialis/tadalafil**. The exact number of instances of diversion/attempted  
26 diversion by Respondent, and the full quantity of drugs diverted/attempted to be diverted, are not  
27 known, but in the course of investigation(s) conducted by Kaiser and the Board of Pharmacy, the  
28 following were among the observations, admissions, and revelations reported:

1 a. In or about June 2010, the pharmacy where Respondent worked was notified by  
2 a fraud detection unit within Kaiser that unusual purchasing and dispensing variances had been  
3 detected with **Cialis/tadalafil 20mg** tablets. At the direction of this unit, supervisory staff in the  
4 pharmacy began conducting daily counts of **Cialis/tadalafil 20 mg** tablets.

5 b. In or about September 2010, additional auditing revealed that in addition to the  
6 **Cialis/tadalafil** variances, the pharmacy was also exhibiting unusual purchasing and dispensing  
7 variances in its stock of **Viagra/sildenafil 100mg** tablets. In or about November 2010, pharmacy  
8 supervisory staff began counting **Cialis/tadalafil 20 mg** tablets, **Viagra/sildenafil 50mg** tablets,  
9 and **Viagra/sildenafil 100mg** tablets two to three times a day. This continued into in or about  
10 February 2011, during which time period the variances of these drugs persisted.

11 c. Thereafter, upgraded video surveillance cameras were covertly installed in two  
12 additional locations. On or about April 23, 2011 and/or April 30, 2011, surveillance footage from  
13 these cameras showed Respondent diverting **Cialis/tadalafil** and/or **Viagra/sildenafil** products.

14 d. On or about May 14, 2011, Respondent was called to an investigatory interview  
15 with a Kaiser investigator. Prior to the start of the interview, Respondent was permitted to view  
16 the surveillance footage from April 23, 2011 and/or April 30, 2011 with a union representative.  
17 Prior to the start of the interview, Respondent resigned her position of employment with Kaiser.  
18 During the interview, the surveillance footage was again reviewed with Respondent.

19 e. On or about June 2, 2011, in accordance with Business and Professions Code  
20 section 4104, subdivision (c), the pharmacist in charge for the pharmacy sent a letter to the Board  
21 reporting theft by Respondent of **Cialis/tadalafil 20mg** tablets and **Viagra/sildenafil 100mg**  
22 tablets. That letter reported a total variance/loss between on or about April 25, 2010 and on or  
23 about May 14, 2011 of three hundred sixteen (316) tablets of **Cialis/tadalafil 20mg**, and one  
24 thousand two hundred twenty five (1,225) tablets of **Viagra/sildenafil 100mg**.

25 e. On or about September 14, 2011, Respondent participated in an interview with  
26 Board Inspector(s). When the Board Inspector(s) showed the Kaiser surveillance footage to  
27 Respondent, she gave no explanation for the footage showing her pocketing a drug container.  
28 She instead commented that character and job performance should be considered.

1 FIRST CAUSE FOR DISCIPLINE

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

3 15. Respondent is subject to discipline under section 4301(f) of the Code, in that  
4 Respondent, as described in paragraphs 13 and 14 above, committed acts involving moral  
5 turpitude, dishonesty, fraud, deceit, or corruption.

6  
7 SECOND CAUSE FOR DISCIPLINE

8 (Furnishing of Dangerous Drug(s))

9 16. Respondent is subject to discipline under section 4301(j) and/or (o) and/or section  
10 4059 of the Code, in that Respondent, as described in paragraphs 13 and 14 above, furnished to  
11 herself or another without a valid prescription, and/or conspired to furnish, and/or assisted or  
12 abetted furnishing of, one or more dangerous drug(s).

13  
14 THIRD CAUSE FOR DISCIPLINE

15 (Unprofessional Conduct)

16 17. Respondent is subject to discipline under section 4301 of the Code in that  
17 Respondent, as described in paragraphs 13 to 16 above, engaged in unprofessional conduct.

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22 PRAYER

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

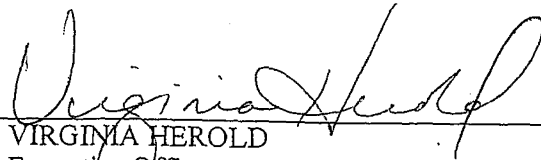
- 25 1. Revoking or suspending Pharmacist License No. RPH 44737, issued to Sun Po Ng  
26 (Respondent);
- 27 2. Ordering Respondent to pay the Board the reasonable costs of the investigation and  
28 enforcement of this case, pursuant to Business and Professions Code section 125.3;

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3. Taking such other and further action as is deemed necessary and proper.

DATED:

11/8/12



VIRGINIA HEROLD  
Executive Officer  
Board of Pharmacy  
Department of Consumer Affairs  
State of California  
*Complainant*

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BOARD OF PHARMACY  
STATE OF CALIFORNIA