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

In the Matter of the Statement of Issues Against:

Case No. 4294

ENTIRELYPETS PHARMACY

Applicant for Community Pharmacy License

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 October 22, 2012.

It is so ORDERED on September 21, 2012.

BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

(. Wusi

By

STANLEY C. WEISSER Board President

1 2	KAMALA D. HARRIS Attorney General of California FRANK H. PACOE Supervising Deputy Attorney General	
3	JOSHUA A. ROOM Deputy Attorney General	
4	State Bar No. 214663 455 Golden Gate Avenue, Suite 11000	
5	San Francisco, CA 94102-7004	
6	Telephone: (415) 703-1299 Facsimile: (415) 703-5480	
7	Attorneys for Complainant	
8	BEFORE BOARD OF P	HARMACY
9	DEPARTMENT OF CO STATE OF CA	DNSUMER AFFAIRS ALIFORNIA
10		
11	In the Matter of the Statement of Issues Against:	Case No. 4294
12	ENTIRELYPETS PHARMACY	STIPULATED SETTLEMENT AND DISCIPLINARY ORDER
13	Applicant for Community Pharmacy License	
14	Respondent.	,
15	In the interest of a prompt and speedy settler	ment of this matter, consistent with the public
16	interest and the responsibility of the Board of Phan	macy, Department of Consumer Affairs, the
17	parties hereby agree to the following Stipulated Se	ettlement and Disciplinary Order that is to be
18	submitted to the Board for approval and adoption	in final disposition of the Statement of Issues.
19		
20	PART	<u>TES</u>
21	1. Virginia Herold (Complainant), Execu	tive Officer of the Board of Pharmacy, brought
22	this action solely in her official capacity and is rep	resented in this matter by Kamala D. Harris,
23	Attorney General of the State of California, by Jos	hua A. Room, Deputy Attorney General.
24	2. EntirelyPets Pharmacy (Respondent) i	s represented in this proceeding by attorney
25	Noah E. Jussim, whose address is: McGuireWood	ls LLP, 1800 Century Park East, 8th Floor, Los
26	Angeles, CA 90067 (telephone (310) 315-8225).	
27	///	
28	///	

J

APPLICATION AND CITATIONS

- 3. On or about October 21, 2011, the Board of Pharmacy received a Community Pharmacy Permit Application from EntirelyPets Pharmacy, listing its parent entity as EntirelyPets Pharmacy, LLC, owned 90.1% by Ritu Ghumman and 9.9% by HealthyPets, Inc. (Respondent). HealthyPets, Inc. is in turn owned 50% by Ritu Ghumman and 50% by Mandeep Ghumman. On or about October 14, 2011, Ritu Ghumman and Mandeep Ghumman, as owner(s) and officer(s), signed a certification under penalty of perjury as to the truthfulness of all statements, answers, and representations in the Application. The Board denied the application on January 18, 2012.
- 4. Respondent and its affiliated entities have also received and/or been the subject(s) of four (4) citations and fines issued by the Board. All have appeals pending. These include:
- a. Citation No. CI 2009 41054, dated November 18, 2010, with \$5,000.00 fine, alleging violations of Business and Professions Code section(s) 4110 and/or 4112 (conducting a pharmacy/nonresident pharmacy without a license), 4076 and/or 4077 (dispensing in inadequately labeled container(s)), and California Code of Regulations, title 16, section 1716 (deviating from a written prescription). Respondent has appealed this Citation.
- b. Citation No. CI 2009 42223, dated November 22, 2010, with a \$55,000.00 fine, alleging violations of Business and Professions Code section(s) 4110 and/or 4112 (conducting a pharmacy/nonresident pharmacy without a license), 4067 and/or California Code of Regulations, title 16, section 1761 (dispensing/furnishing Internet prescriptions issued without a good faith prior examination, with significant error, omission, irregularity, uncertainty, ambiguity or alteration, and/or not for a legitimate medical purpose). Respondent has appealed this Citation.
- c. Citation No. CI 2011 49563, dated December 7, 2011, with a \$5,000.00 fine, alleging violations of Business and Professions Code section(s) 4160 and/or 4161 (conducting a wholesaler/nonresident wholesaler without a license). Respondent has appealed this Citation.

///

¹ Both Ritu Ghumman and Mandeep Ghumman are Doctors of Veterinary Medicine, and both are licensed by the California Veterinary Medical Board. License No. 14261, issued to Dr. Ritu Ghumman, is in inactive status, and she may not practice veterinary medicine at this time. License No. 12996, issued to Dr. Mandeep Ghumman, is active and unrestricted at this time.

d. Citation No. CI 2011 49569, dated December 7, 2011, with a \$5,000.00 fine, alleging violations of Business and Professions Code section(s) 4160 and/or 4161 (conducting a wholesaler/nonresident wholesaler without a license). Respondent has appealed this Citation.

This Stipulated Settlement and Disciplinary Order is also intended to serve as a settlement of all pending appeals and other matters pertaining to the above-listed citations and fines.

JURISDICTION

4. Statement of Issues No. 4294 was filed before the Board of Pharmacy (Board), and is currently pending against Respondent. The Statement of Issues and all other statutorily required documents were properly served on Respondent on May 31, 2012. A copy of Statement of Issues No. 4294 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

- 5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Statement of Issues No. 4294, and in each of the above-listed citations. Respondent has also carefully read, fully discussed with counsel, and understands the effects of, this Stipulated Settlement and Disciplinary Order.
- 6. Respondent is fully aware of its legal rights in this matter, including the right to a hearing on the charges and allegations in the Statement of Issues or in any pending citations; the right to be represented by counsel at its own expense; the right to confront and cross-examine the witnesses against them; the right to present evidence and to testify on its own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.
- 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.
- 8. Respondent further withdraws any notices of appeal or other requests for hearing on the above-listed citations, and agrees that those citations will now be final as issued.

CULPABILITY

9. Respondent, by its authorized representative, admits the truth of each and every charge and allegation in Statement of Issues No. 4294. Respondent further agrees that its Community Pharmacy Permit Application is subject to denial, and agrees to be bound by the Board of Pharmacy (Board)'s probationary terms as set forth in the Disciplinary Order below.

RESERVATION

10. Admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Board of Pharmacy or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

CONTINGENCY

- 11. This stipulation shall be subject to approval by the Board of Pharmacy. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Pharmacy may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or its counsel. By signing the stipulation, Respondent understands and agrees that they may not withdraw its agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.
- 12. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement with regard to the Statement of Issues and the above-listed citations. As to those matters, this written agreement supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

- 13. The parties understand and agree that facsimile copies of this stipulation, including facsimile signatures thereto, shall have the same force and effect as the originals.
- 14. In consideration of the foregoing, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that, upon satisfaction of statutory and regulatory requirements for issuance thereof, including but not limited to submission of documentation demonstrating the compliance of its ownership structure(s) with Business and Professions Code section 4111 as specified below, a Pharmacy License shall be issued by the Board of Pharmacy to EntirelyPets Pharmacy (Respondent), and immediately revoked. Revocation is stayed and the license is placed on probation for five (5) years on the terms and conditions detailed below.

1. Compliance with Business and Professions Code section 4111

Prior to issuance of the license, and as a condition precedent to issuance of the license and commencement of the period of probation, Respondent shall gather or prepare, and submit to the Board, documentation demonstrating that its ownership does not violate Business and Professions Code section 4111, i.e., that no person or persons authorized to prescribe or write a prescription in California: is a sole or controlling owner of Respondent; shares a community or other financial interest in a sole or controlling ownership of Respondent; controls or owns a 10 percent or greater share of a corporation or other entity that is a sole or controlling owner of Respondent; or shares a community or other financial interest in a greater than 10 percent share of a corporation or other entity that is a sole or controlling owner of Respondent. Respondent shall submit such materials and documentation as are requested by the Board or its designee, and the Board or its designee shall have sole discretion to determine whether satisfactory documentation has been submitted. The documentation shall include, at least, affidavits signed under penalty of perjury by all owners and officers of Respondent or Respondent's owners or parent entities, stating that he or she: (a) is not now authorized to prescribe in California, and/or (b) does not have an ownership share, either directly or through community or other shared interest, sufficient to trigger section 4111.

All such affidavits shall be supported by documentation demonstrating the accuracy of the statements made therein. The Board or its designee may require additional documentation.

At no point during its licensure by the Board, including after the expiration of the period of probation, may Respondent's ownership violate this ownership limitation.² Pursuant to Business and Professions Code section 4111, subdivision (c), the Board or its designee may require any information that it deems reasonably necessary for the enforcement of this section, including but not limited to supplemental affidavits and documentation required at each renewal.

2. Civil Penalty

Respondent shall pay to the Board a civil penalty of \$50,000.00. Payments shall be made as follows: Prior to issuance of the license, and as a condition precedent to issuance of the license and commencement of the period of probation, Respondent shall make a payment of \$5,000.00. Thereafter, once probation commences, Respondent shall make sixteen (16) quarterly payments of \$2,812.50 each. Payment shall be made in full within four (4) years of the start of probation.

Respondent understands and agrees that this civil penalty is an administrative fine pursuant to 11 U.S.C. § 523(a)(7), and is non-dischargeable in bankruptcy. Respondent further understands and agrees that the filing of bankruptcy by Respondent shall not relieve Respondent of the obligation to pay the balance of the civil penalty to the Board.

Payment of this civil penalty shall satisfy all of the assessed, outstanding, pending, and appealed fines included in the above-listed citations. Upon full payment of the civil penalty, all of the above-listed citations shall be deemed satisfactorily resolved, and shall be so represented in any future public disclosure of those citations by the Board.

Failure to timely pay this civil penalty shall be considered a violation of probation. Further, absent prior written approval by the Board or its designee, Respondent may not successfully complete probation until this amount is paid in full.

² This shall include that any owner avoiding the prohibition(s) in section 4111 by making his or her license to prescribe in California inactive or otherwise not an authorization to prescribe, shall at no time during his or her ownership of Respondent reactivate that license or have his/her authorization to prescribe reinstated. Should any person meeting the ownership threshold(s) in section 4111 hereafter become authorized to prescribe in California, he or she must immediately divest and/or transfer his or her ownership share to come into compliance with section 4111.

3. Obey All Laws

Respondent shall obey all state and federal laws and regulations. Respondent shall report to the Board, in writing, within seventy-two (72) hours of such occurrence, any of the following with regard to Respondent or any of its owners, officers, managers, or employees:

- an arrest or issuance of a criminal complaint for violation of any provision of the Pharmacy Law, state and federal food and drug laws, or state and federal controlled substances laws
- a plea of guilty or nolo contendre in any state or federal criminal proceeding to any criminal complaint, information or indictment
- a conviction of any crime
- discipline, citation, or other administrative action filed by any state or federal agency
 which involves Respondent's wholesaler license or which is related to the practice of
 pharmacy or the manufacturing, obtaining, handling or distributing, billing, or
 charging for any drug, device or controlled substance.

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

4. Engagement of Consultant

During probation, Respondent shall, at its expense, retain an independent consultant who shall be responsible for reviewing pharmacy operations on a monthly basis for compliance by Respondent with state and federal laws and regulations governing the practice of pharmacy and for compliance by the pharmacist in charge for Respondent with the obligations of a pharmacist in charge. The consultant shall be a pharmacist licensed by and not on probation with the Board and whose name shall be submitted to the Board or its designee, for prior approval, within thirty (30) days of the effective date of this decision. Failure to timely retain, seek approval of, or ensure timely reporting by the consultant shall be considered a violation of probation

5. Interview with the Board

Upon receipt of reasonable prior notice, an owner or officer of Respondent shall appear in person for interviews with the Board or its designee, at intervals and locations as determined by the Board or its designee. Failure to appear for any scheduled interview without prior notification to Board staff, or failure to appear for two (2) or more scheduled interviews with the Board or its designee during the period of probation, shall be considered a violation of probation.

///

21[°]

6. Report to the Board

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

7. Cooperate with Board Staff

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

8. Probation Monitoring Costs

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

9. Status of License

Respondent shall, at all times while on probation, maintain current licensure with the Board. If Respondent submits an application to the Board, and the application is approved, for a change of location, change of permit or change of ownership, the Board shall retain continuing jurisdiction over the license, and Respondent shall remain on probation as determined by the Board. Failure to maintain current licensure shall be considered a violation of probation.

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

10. Notice to Employees

Respondent shall, upon or before the effective date of this decision, ensure that all employees involved in permit operations are made aware of all the terms and conditions of probation, either by posting a notice of the terms and conditions, circulating such notice, or both. If the notice required by this provision is posted, it shall be posted in a prominent place and shall remain posted throughout the probation period. Respondent shall ensure that any employees hired or used after the effective date of this decision are made aware of the terms and conditions of probation by posting a notice, circulating a notice, or both. Additionally, Respondent shall submit written notification to the Board, within fifteen (15) days of the effective date of this decision, that this term has been satisfied. Failure to submit such notification to the Board shall be considered a violation of probation.

"Employees" as used in this provision includes all full-time, part-time, volunteer, temporary, and relief employees and independent contractors employed or hired at any time during probation.

11. Posted Notice of Probation

Respondent shall prominently post a probation notice provided by the Board in a place conspicuous and readable to the public. The probation notice shall remain posted during the entire period of probation.

Respondent shall not, directly or indirectly, engage in any conduct or make any statement which is intended to mislead or is likely to have the effect of misleading any patient, customer, member of the public, or other person(s) as to the nature of and reason(s) for the probation.

Failure to post such notice shall be considered a violation of probation.

12. Owners and Officers: Knowledge of the Law

Respondent shall provide, within thirty (30) days after the effective date of this decision, signed and dated statements from its owners, including any owner or holder of ten percent (10%) or more of the interest in Respondent or Respondent's stock, and any officer, stating under penalty of perjury that said individuals have read and are familiar with state and federal laws and regulations governing the practice of pharmacy. The failure to timely provide said statements under penalty of perjury shall be considered a violation of probation.

13. License Surrender While on Probation/Suspension

Following the effective date of this decision, should Respondent discontinue business, Respondent may tender the premises license to the Board for surrender. The Board or its designee shall have the discretion whether to grant the request for surrender or take any other action it deems appropriate and reasonable. Upon formal acceptance of the surrender of the license, Respondent will no longer be subject to the terms and conditions of probation. This surrender constitutes a record of discipline and shall become a part of the Respondent's license history with the Board.

Upon acceptance of the surrender, Respondent shall relinquish the premises wall and renewal license to the Board within ten (10) days of notification by the Board that the surrender is accepted. Respondent shall further submit a completed Discontinuance of Business form according to Board guidelines and shall notify the Board of the records and inventory transfer.

Neither Respondent nor its officers or owners may apply for any new Board license for three (3) years from the effective date of the surrender. Any applicant shall meet all requirements applicable to the license sought as of the date the application is submitted to the Board.

Respondent further stipulates that any applicant shall reimburse the Board for its costs of investigation and prosecution prior to the acceptance of the surrender.

14. Violation of Probation

If Respondent has not complied with any term or condition of probation, the Board shall have continuing jurisdiction over Respondent's license, and probation shall be automatically 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.

15, 1 Completion of Probation 2 Upon written notice by the Board or its designee indicating successful completion of 3 probation, Respondent's license will be fully restored. 5 ACCEPTANCE 6 7 8 9 10 Decision and Order of the Board of Pharmacy 11 DATED: 12 13 14 15 16 17 18 6/21/12 DATED: 19 20 21 22 23 Dated: 24 25 26

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Noah E. Jussim. I understand the stipulation and the effect it will have on my Community Pharmacy Permit Application, and on the above-listed citations that are also the subject of and resolved by this agreement. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the

Chumman, for ENTIRELYPETS PHARMACY

Respondent

I have read and fully discussed with the executive officer(s) for Respondent EntirelyPets Pharmacy the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

Attorney for Respondent

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.

27

28 SP2012204087; 40548617.doc Kamala D. Harris Attorney General of California Frank H. Pacob

Supervising Deputy Attorney General

Joshua A. Room Deputy Attorney General Attorneys for Complainant

STIPULATED SETTLEMENT (Statement of Issues No. 4294)

Ţ	15. Completion of Probation		
2	Upon written notice by the Board or its designee indicating successful completion of		
3	probation, Respondent's license will be fully restored.		
4			
5	<u>ACCEPTANCE</u>		
6	I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully		
7	discussed it with my attorney, Noah E. Jussim. I understand the stipulation and the effect it will		
8	have on my Community Pharmacy Permit Application, and on the above-listed citations that are		
9	also the subject of and resolved by this agreement. I enter into this Stipulated Settlement and		
10	Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the		
11	Decision and Order of the Board of Pharmacy.		
12	DATED:		
13	Ritu Ghumman, for ENTIRELYPETS PHARMACY Respondent		
14			
15	I have read and fully discussed with the executive officer(s) for Respondent EntirelyPets		
16	Pharmacy the terms and conditions and other matters contained in the above Stipulated		
17	Settlement and Disciplinary Order. I approve its form and content.		
18	DATED:		
19	NOAH E. JUSSIM Attorney for Respondent		
20	ENDORSEMENT		
21	The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully		
22	submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.		
23	Dated: 6/21/2012 KAMALA D. HARRIS		
24	Attorney General of California FRANK H. PACOE		
25	Supervising Deputy Attorney General		
26	JOSHUA A. ROOM		
27	Deputy Attorney General Attorneys for Complainant		
28	SF2012204087; 40548617.doc		

Exhibit A

Statement of Issues No. 4294

- 11						
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 455 Golden Gate Avenue, Suite 11000					
5	San Francisco, CA 94102-7004					
6	Telephone: (415) 703-1299 Facsimile: (415) 703-5480					
7	Attorneys for Complainant					
8	BEFORE BOARD OF PH	IARMACY				
9	DEPARTMENT OF COI STATE OF CAI					
10						
11	In the Matter of the Statement of Issues Against:	Case No. 4294				
12	ENTIRELYPETS PHARMACY					
13	Applicant for Community Pharmacy License	STATEMENT OF ISSUES				
14	Respondent.					
15	Complainant alleges:					
16	PARTI	<u>ES</u>				
17	1. Virginia Herold (Complainant) brings t	his Statement of Issues solely in her official				
18	capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.					
19	2. On or about October 21, 2011, the Boar	rd of Pharmacy received a Community				
20	Pharmacy Permit Application from EntirelyPets Ph	armacy, listing its parent entity as EntirelyPets				
21	Pharmacy, LLC, owned 90.1% by Ritu Ghumman	and 9.9% by HealthyPets, Inc. (Respondent).				
22	HealthyPets, Inc. is in turn owned 50% by Ritu Gh	umman and 50% by Mandeep Ghumman. 1 On				
23	or about October 14, 2011, Ritu Ghumman and Ma	indeep Ghumman, as owner(s) and officer(s),				
24	signed a certification under penalty of perjury as to	the truthfulness of all statements, answers,				
25	and representations in the Application. The Board	denied the application on January 18, 2012.				
26		man are Doctors of Veterinary Medicine, and				
27	both are licensed by the California Veterinary Med Ritu Ghumman, is in inactive status, and she may r License No. 12996, issued to Dr. Mandeep Ghumn	not practice veterinary medicine at this time.				
28		·				

8

11 12

10

13 14

15 16

17

18

19 20

21

22 23

24 25

26

27 28

JURISDICTION AND STATUTORY/REGULATORY PROVISIONS

- 3. This Statement of Issues is brought before the Board of Pharmacy (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.
 - 4. Section 480 of the Code states, in pertinent part:
- "(a) A board may deny a license regulated by this code on the grounds that the applicant has one of the following:
- "(1) Been convicted of a crime. . . . Any action which a board is permitted to take following the establishment of a conviction may be taken . . . irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code.
- "(2) Done any act involving dishonesty, fraud or deceit with the intent to substantially benefit himself or another, or substantially injure another; or
- "(3) Done any act which if done by a licentiate of the business or profession in question, would be grounds for suspension or revocation of license.

"The board may deny a license pursuant to this subdivision only if the crime or act is substantially related to the qualifications, functions or duties of the business or profession for which application is made."

- 5. Section 4300, subdivision (c), of the Code states:
- "(c) The board may refuse a license to any applicant guilty of unprofessional conduct. The board may, in its sole discretion, issue a probationary license to any applicant for a license who is guilty of unprofessional conduct and who has met all other requirements for licensure. . . . "
- 6. Section 4301 of the Code provides, in pertinent part, that "unprofessional conduct" is defined to include, but not be limited to, any of the following:
- (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.
- (i) The violation of any of the statutes of this state, of any other state, or of the United States regulating controlled substances and dangerous drugs.

1.8

- (o) Violating or attempting to violate, directly or indirectly, or assisting or abetting the violation of, or conspiring to violate, any provision or term of this chapter or of the applicable federal and state laws and regulations governing pharmacy, including regulations established by the board or by any other state or federal regulatory agency.
- 7. Section 4037 of the Code defines "pharmacy" to mean and include any area, place, or premises licensed by the Board wherein the profession of pharmacy is practiced, prescriptions are compounded, controlled substances, dangerous drugs, or dangerous devices are stored, possessed, prepared, manufactured, derived, compounded, or repackaged, and from which the controlled substances, dangerous drugs, or dangerous devices are furnished, sold, or dispensed at retail.
- 8. Section 4043 of the Code defines "wholesaler" to mean and include any person/entity that acts as a wholesale merchant, broker, jobber, customs broker, reverse distributor, agent, or a nonresident wholesaler, who sells for resale, or negotiates for distribution, or takes possession of, any drug or device included in Section 4022 (dangerous drugs and dangerous devices).
- 9. Section 4067 of the Code provides, in pertinent part, that no person or entity shall dispense or furnish, or cause to be dispensed or furnished, dangerous drugs or dangerous devices, as defined in Section 4022 of the Code, on the Internet for delivery to any person in this state without a prescription issued pursuant to a good faith prior examination of a human or animal for whom the prescription is meant if the person or entity either knew or reasonably should have known that the prescription was not issued pursuant to a good faith prior examination of a human or animal, or if the person or entity did not act in accordance with Section 1761 of Title 16 of the California Code of Regulations. A "good faith prior examination" includes the requirements for a physician and surgeon in Section 2242 of the Code and the requirements for a veterinarian in Section 2032.1 of Title 16 of the California Code of Regulations.
- 10. Section 4110 of the Code provides, in pertinent part, that no person shall conduct a pharmacy in California without first obtaining a license issued by the Board.
- 11. Section 4112 of the Code provides, in pertinent part, that no person/entity located outside the state may ship, mail, or deliver controlled substances, dangerous drugs, or dangerous devices into California without first obtaining a nonresident pharmacy license from the Board.

- 12. Section 4160 of the Code provides, in pertinent part, that no person/entity may act as a wholesaler of a dangerous drug or device without first obtaining a license from the Board.
- 13. Section 4161 of the Code provides, in pertinent part, that no person/entity located outside the state may ship, sell, mail, or deliver dangerous drugs or dangerous devices into this state, or sell, broker, or distribute dangerous drugs or dangerous devices within this state, without first obtaining a nonresident wholesaler license issued by the Board.
- 14. Section 4076 of the Code requires, in pertinent part, that a pharmacist shall not dispense a prescription except in a container that meets the requirements of state and federal law and is correctly labeled with the information specified by that section.
- 15. Section 4077 of the Code provides, in pertinent part, that except under circumstances not relevant here, no person shall dispense any dangerous drug except in a container correctly labeled with the information required by section 4076.
 - 16. California Code of Regulations, title 16, section 1716, states in pertinent part:

"Pharmacists shall not deviate from the requirements of a prescription except upon the prior consent of the prescriber or to select the drug product in accordance with Section 4073...."

- 17. California Code of Regulations, title 16, section 1761, provides in pertinent part, that no pharmacist shall compound or dispense any prescription which contains any significant error, omission, irregularity, uncertainty, ambiguity or alteration, shall contact the prescriber to obtain the information needed to validate the prescription, and even after conferring with the prescriber, shall not compound or dispense a controlled substance prescription where the pharmacist knows or has objective reason to know the prescription was not issued for a legitimate medical purpose.
- 18. Section 4111, subdivision (a), of the Code provides that the Board shall not issue or renew a license to conduct a pharmacy to a person or persons authorized to prescribe or write a prescription within the State of California, to any person or persons sharing a community or other financial interest with such prescriber, or to any corporation that is controlled by, or in which 10 percent or more of the stock is owned by, such a prescriber or any person with a community or other financial interest in common with such a prescriber.

8

15

16 17

18

19

20 21

22

23 24

25

26

27 28

CITATION AND FINE AUTHORITY

- Section 125.9 of the Code provides, in pertinent part, that the Board may establish, by regulation, a system for issuance to a licensee of a citation to contain an order of abatement or an order to pay an administrative fine assessed by the Board, or both, and the system shall include a provision whereby failure of a licensee to pay a fine within 30 days of the date of assessment by a citation not being appealed, may result in disciplinary action being taken.
- Section 148 of the Code provides, in pertinent part, that the Board may establish, by regulation, a similar system for issuance of a citation to an unlicensed person/entity acting in the capacity of a licensee or registrant under the jurisdiction of the Board.
- 21. Section 4314 of the Code similarly provides, in pertinent part, that the Board may issue citations containing fines and orders of abatement for any violation of the Pharmacy Law.
- 22. California Code of Regulations, title 16, section 1775 et seq. provide, in pertinent part, that the Executive Officer for the Board may issue citations containing either or both a fine and an order of abatement for any violation of the Pharmacy Law.

FACTUAL BACKGROUND

- 23. During the events and time periods described in the following, Respondent and/or its affiliated entities were acting under, by and/or through entity names including HealthyPets, Inc., EntirelyPets.com, and/or Pet Pharmacy Plus. "Respondent" shall refer to all of these entities.
- On or about May 15, 2009, Respondent dispensed/mailed RX 6205953, a prescription container containing Metacam 1.5 mg/ml (a trade name for the generic drug meloxicam), a dangerous drug, to a California customer (for a feline patient). Respondent used addresses both within and outside California. Respondent was not licensed by the Board as a pharmacy. The container label did not include the prescriber name or the name and address of the dispensing pharmacy. The prescription called for Metacam .5 mg/ml instead of the dispensed Metacam 1.5 mg/ml, and the directions for use were written as "eight pound dose by mouth once daily" but were printed on the container label as being "use as directed by your veterinarian."²

² These allegations are also the subject of Citation No. CI 2009 41054, issued November 18, 2010. Respondent has appealed that Citation, and that appeal is now pending.

- 25. On or about July 29 and July 30, 2009, Respondent dispensed/mailed RX 6205953, a prescription container containing Soloxine .1 mg, and RX 6227612, a prescription container containing Soloxine .8 mg (generic: levothyroxine), a dangerous drug, to a California customer (canine patient). Respondent used addresses both within and outside California. Respondent was not licensed by the Board as a pharmacy. The prescriptions were dispensed and/or transacted via the Internet and/or without a prescription issued pursuant to a good faith prior examination and/or the prescriptions contained a significant error, omission, irregularity, uncertainty, ambiguity or alteration and/or there was reason to know they were not issued for a legitimate medical purpose.³
- 26. Between on or about September 25, 2009 and on or about October 27, 2009, using an address outside of California, Respondent sold, traded, or otherwise transferred dangerous drugs to a pharmacy licensed by the Board located in California.⁴
- 27. Between on or about February 24, 2010 and on or about March 4, 2010, using an address in California, Respondent sold, traded, or otherwise transferred dangerous drugs to a pharmacy licensed by the Board located in California.⁵

FIRST CAUSE FOR DENIAL OF APPLICATION

(Unlicensed Practice of Pharmacy)

28. Respondent's application is subject to denial under the following section(s) of the Code: 4110 and/or 4112; 480(a)(3) by reference to 4301(j), (o), 4110 and/or 4112; or 4300(c) by reference to 4301(j), (o), 4110 and/or 4112; in that Respondent, as described in paragraph(s) 24 and/or 25 above, acted as a pharmacy without a pharmacy or nonresident pharmacy license, and thereby violated the Pharmacy Law; did acts constituting cause for discipline against a license; engaged in unprofessional conduct; violated statutes regulating controlled substances / dangerous drugs; and/or violated/attempted to violate, directly or indirectly, or assisted or abetted violation of, or conspired to violate, federal or state laws and regulations governing pharmacy.

³ These allegations are also the subject of Citation No. CI 2009 42223, issued November 22, 2010. Respondent has appealed that Citation, and that appeal is now pending.

⁴ These allegations are also the subject of Citation No. CI 2011 49569, issued December 7, 2011, Respondent has appealed that Citation, and that appeal is now pending.

⁵ These allegations are also the subject of Citation No. CI 2011 49563, issued December 7, 2011. Respondent has appealed that Citation, and that appeal is now pending.

SECOND CAUSE FOR DENIAL OF APPLICATION

(Inadequate Labeling and/or Deviation from Prescription)

29. Respondent's application is subject to denial under the following section(s) of the Code and applicable regulations: 4076, 4077, and/or California Code of Regulations, title 16, section 1716; 480(a)(3) by reference to 4301(j), (o), 4076, 4077, and/or California Code of Regulations, title 16, section 1716; or 4300(c) by reference to 4301(j), (o), 4076, 4077, and/or California Code of Regulations, title 16, section 1716; in that Respondent, as described in paragraph 24 above, failed to include prescriber name, pharmacy name and address, and correct directions for use on the prescription container label, and/or deviated from the prescription, and thereby violated the Pharmacy Law; did acts constituting cause for discipline against a license; engaged in unprofessional conduct; violated statutes regulating controlled substances / dangerous drugs; and/or violated/attempted to violate, directly or indirectly, or assisted or abetted violation of, or conspired to violate, federal or state laws and regulations governing pharmacy.

THIRD CAUSE FOR DENIAL OF APPLICATION

(Improper Dispensing Pursuant to Internet Prescriptions)

30. Respondent's application is subject to denial under the following section(s) of the Code and applicable regulations: 4067 and/or California Code of Regulations, title 16, section 1761; 480(a)(3) by reference to 4301(j), (o), 4067 and/or California Code of Regulations, title 16, section 1761; or 4300(c) by reference to 4301(j), (o), 4067 and/or California Code of Regulations, title 16, section 1761; in that Respondent, as described in paragraph 25 above, dispensed and/or transacted one or more prescriptions via the Internet and/or without a prescription issued pursuant to a good faith prior examination and/or the prescriptions contained a significant error, omission, irregularity, uncertainty, ambiguity or alteration and/or there was reason to know they were not issued for a legitimate medical purpose, and thereby violated the Pharmacy Law; did acts constituting cause for discipline against a license; engaged in unprofessional conduct; violated statutes regulating controlled substances / dangerous drugs; and/or violated/attempted to violate, directly or indirectly, or assisted or abetted violation of, or conspired to violate, federal or state laws and regulations governing pharmacy.

FOURTH CAUSE FOR DENIAL OF APPLICATION

(Unlicensed Wholesaling)

31. Respondent's application is subject to denial under the following section(s) of the Code: 4160 and/or 4161; 480(a)(3) by reference to 4301(j), (o), 4160 and/or 4161; 4300(c) by reference to 4301(j), (o), 4161 and/or 4161; in that Respondent, as described in paragraph(s) 26 and/or 27 above, acted as a wholesaler without a wholesaler or nonresident wholesaler license, and thereby violated the Pharmacy Law; did acts constituting cause for discipline against a license; engaged in unprofessional conduct; violated statutes regulating controlled substances / dangerous drugs; and/or violated/attempted to violate, directly or indirectly, or assisted or abetted violation of, or conspired to violate, federal or state laws and regulations governing pharmacy.

FIFTH CAUSE FOR DENIAL OF APPLICATION

(Dishonesty, Fraud, Deceit, or Corruption)

32. Respondent's application is subject to denial under the following section(s) of the Code: 480(a)(2); 4301(f); 480(a)(3) by reference to 4301(f), (j), and/or (o); or 4300(c) by reference to 4301(f), (j), and/or (o); in that Respondent, by the conduct described in paragraphs 23 to 31, did acts involving dishonesty, fraud or deceit with intent to substantially benefit itself or another, or substantially injure another; did acts involving moral turpitude, dishonesty, fraud, deceit, or corruption; did acts constituting causes for discipline against a license; engaged in unprofessional conduct; violated statutes regulating controlled substances and dangerous drugs; and/or violated/attempted to violate, directly or indirectly, assisted/abetted violation of, or conspired to violate, federal or state laws and regulations governing pharmacy.

SIXTH CAUSE FOR DENIAL OF APPLICATION

(Unprofessional Conduct)

33. Respondent's application is subject to denial under the following section(s) of the Code: 4300(c); 480(a)(3) by reference to 4301; and/or 4300(c) by reference to 4301, in that Respondent, by the conduct described in paragraphs 23 to 32, engaged in unprofessional conduct.

///

///

4

11

1213

. 14

15

16 17

18

19

20

21 22

23

24

25

26 27

28

OTHER CONSIDERATIONS

- 34. As additional consideration(s) in determining whether Respondent's application is subject to denial, Complainant further alleges the following:
- a. Section 4111 of the Code prohibits issuance or renewal of a license to conduct a pharmacy to a person or persons authorized to prescribe or write a prescription in California, to any person or persons sharing a community or other financial interest with such prescriber, or to any corporation controlled by, or in which 10% or more of the stock is owned by, a prescriber or any person with a community or other financial interest in common with such a prescriber;
- b. Dr. Ritu Ghumman, D.V.M., License No. 14261, is a veterinarian licensed by the California Veterinary Medical Board. Her license is in inactive status, and therefore she may not practice veterinary medicine in California at this time.
- c. Dr. Mandeep Ghumman, D.V.M., License No. 12996, is a veterinarian licensed by the California Veterinary Medical Board. His license is active and unrestricted at this time.
 - d. Mandeep Ghumman and Ritu Ghumman are husband and wife.

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 Community Pharmacy Permit Application received from EntirelyPets Pharmacy, listing its parent entity as EntirelyPets Pharmacy, LLC, owned 90.1% by Ritu Ghumman and 9.9% by HealthyPets, Inc., where HealthyPets, Inc. is in turn owned 50% by Dr. Ritu Ghumman, D.V.M. and 50% by Dr. Mandeep Ghumman, D.V.M. (Respondent);

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

DATED: 5/31/12

VIRGINIA HEROLD Executive Officer Board of Pharmacy

Department of Consumer Affairs

State of California

Complainant

SF2012204087 20611575.doc

BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

CITATION AND FINE

Citation Number	Name, License No
CI 2009 41054	EntirelyPets.com, Unlicensed

JURISDICTION: Bus. & Prof. Code § 4005; CCR, title 16, § 1775;

VIOLATION CODE SECTION	OFFENSE	AMT OF FINE
Bus. & Prof. Code § 4110 subd. (a)/Bus. & Prof. Code § 4112 subd. (a) & (b)	No person shall conduct a pharmacy in the State of California unless he or she has obtained a license from the board/Nonresident pharmacy: Registration required/All nonresident pharmacies shall register with the board…	\$3,000.00
CCR, Title 16, § 1716/Bus. & Prof. Code § 4077 subd. (a)/Bus. & Prof. Code § 4076 subd. (a)(1)(2)(6)	Variation from prescription/Dispensing dangerous drugs in an incorrectly labeled container/Prescription Container - Requirements for Labeling; Container must meet requirements of law with proper labeling, Drug name or active ingredients; Directions for use; Name and address of pharmacy, and prescription number	\$2,000.00

CONDUCT:

Unlicensed Activity: Business and Professions Code section 4110 subd. (a) said no person shall conduct a pharmacy in the state of California unless he or she has obtained a license from the Board and Business and Professions Code section 4112 subd. (a) said any pharmacy located outside of this state that ships, mails, or delivers, in any manner, controlled substances, dangerous drugs, or dangerous devices into this state shall be considered a nonresident pharmacy and 4112 subd. (b) said all nonresident pharmacies shall register with the Board. EntirelyPets.com was not in compliance with the laws. Specifically, on 5/15/2009 EntirelyPets.com located at an unknown address, using Postal Mail Box #384 at 710 South 13th Street, Suite 900, in Norfolk, NE 68701 and product returns address 43450 Mintwood Street in Fremont, CA 94538, and which was part of HealthyPets Inc. located at 34501 Seventh Street in Union City, CA 94587, mailed RX 6205953, a prescription for Metacam 1.5mg/ml, to a California customer using the pharmacy name Pet Pharmacy Plus, when neither EntirelyPets.com nor Pet Pharmacy Plus were licensed as a California pharmacy or a California nonresident pharmacy. This was a violation of pharmacy law.

Medication Error: California Code of Regulations section 1716 prohibited the variation from a prescription without prescriber authorization and Business and Professions Code section 4077 subd. (a) required a prescription to be dispensed in a container labeled with the information required in Business and Professions Code section 4076 subd. (a)(1) the name of the prescriber, (2) the directions for use, and (6) the name and address of the pharmacy. EntirelyPets.com was not in compliance with the laws. Specifically, on 5/15/2009 EntirelyPets.com located at an unknown address, using Postal Mail Box #384 at 710 South 13th Street, Suite 900, in Norfolk, NE 68701 and product returns address 43450 Mintwood Street in Fremont, CA 94538, and which was part of HealthyPets Inc. located at 34501 Seventh Street in Union City, CA 94587, dispensed RX 6205953 for Armstrong feline as Metacam 1.5mg/ml instead of the prescribed Metacam .5mg/ml using pharmacy name Pet Pharmacy Plus. Furthermore, the directions for use on the label said to "use as directed by your veterinarian" instead of the prescribed "eight pound dose by mouth once daily." Also, the prescriber name was missing, and the correct name and address of the pharmacy was missing. This was a violation of pharmacy law.

CITATION ISSUED ON: November 18, 2010

TOTAL AMOUNT OF FINE(S): \$5,000.00

PAYMENT OF FINE(S) DUE BY: December 18, 2010

BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

CITATION AND FINE

Citation Number	Name, License No
CI 2009 42223	Entirely Pets.com DBA Pet Pharmacy Plus, Unlicensed

JURISDICTION: Bus. & Prof. Code § 4005; CCR, title 16, § 1775; Bus. & Prof. Code § 4301, subd. (o)

VIOLATION CODE SECTION	OFFENSE	AMT OF FINE
Bus. & Prof. Code § 4110 subd. (a)/Bus. & Prof. Code § 4112 subd. (a) & (b)	No person shall conduct a pharmacy in the State of California unless he or she has obtained a license from the board/Nonresident pharmacy: Registration required/All nonresident pharmacies shall register with the board	\$5,000.00
Bus. & Prof. Code § 4067 subd. (a)	No person shall dispense or furnish, or cause to be furnished dangerous drugson the internetwithout a prescription issued pursuant to a good faith examination	\$50,000.00

CONDUCT:

Unlicensed Activity: Business and Professions Code section 4110(a) said no person shall conduct a pharmacy in the state of California unless he or she has obtained a license from the Board and Business and Professions Code section 4112(a) said any pharmacy located outside of this state that ships, mails, or delivers, in any manner, controlled substances, dangerous drugs, or dangerous devices into this state shall be considered a nonresident pharmacy and 4112(b) said all nonresident pharmacies shall register with the Board. EntirelyPets.com was not in compliance with the laws. Specifically, on 7/29/2009 and 7/30/2009 EntirelyPets.com located at 34501 Seventh Street in Union City, CA 94587, using Postal Mail Box #384 at 710 South 13th Street, Suite 900, in Norfolk, NE 68701 and a product return address 43450 Mintwood Street in Fremont, CA 94538 shipped RX 6227029, Soloxine .1mg, and RX 6227612, Soloxine .8mg, to a California customer, SA, using the pharmacy name Pet Pharmacy Plus, when neither EntirelyPets.com nor Pet Pharmacy Plus were licensed as a California pharmacy or a California nonresident pharmacy. This was a violation of pharmacy law.

BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

CITATION AND FINE

Citation Number	Name, License No.	
CI 2011 49563	Healthy Pets Inc., Unlicensed	

JURISDICTION: Bus. & Prof. Code § 4005; CCR, title 16, § 1775; Bus. & Prof. Code § 4314, subd. (1), 148				
VIOLATION CODE SECTION	OFFENSE	AMOUNT OF FINE		
Bus. & Prof. Code § 4043 subd (a)/Bus. & Prof. Code § 4160 subd. (a)	Wholesaler means and includes every person who acts as a wholesale merchant, broker, jobber, customs broker, reverse distributor, or agent who sells, negotiates for distribution or takes possession of	\$5,000.00		

CONDUCT:

<u>Unlicensed Wholesaler</u>. Business and Professions Code section 4043(a) defines a wholesaler to include a person who acts as a wholesale merchant, broker, jobber, customs broker, reverse distributor, agent, or a nonresident wholesaler, who sells for resale, or negotiates for distribution, or takes possession of, any drug or device included in section 4022 and Business and Professions Code section 4160(a) states a person may not act as a wholesaler of any dangerous drug unless licensed by the Board. Healthy Pets Inc. was non-compliant. Specifically, from on or about 2/24/10 to on or about 3/4/10, Healthy Pets Inc., an unlicensed wholesaler located at 43500 Mintwood St., Fremont, CA 94538, sold dangerous drugs to Pet Meds N More, Inc., located in Los Angeles, CA without first obtaining a license from the Board. This was a violation of pharmacy law.

Wholesaler DateAmount Solo ToShip to Name Shiβ to Address					
Healthy Pets Inc.	2/24/10	\$8,534.63	Pet Meds N More, Inc.	Pet Meds N More, Inc.	11901 Santa Monica Blvd. #429, Los Angeles
Healthy Pets Inc.	3/4/10	\$19,678.82	Pet Meds N More, Inc.	Pet Meds N More, Inc.	11901 Santa Monica Blvd. #429, Los Angeles

CITATION ISSUED ON: December 7, 2011

TOTAL AMOUNT OF FINE(S): \$5,000,00

PAYMENT OF FINE(S) DUE BY January 6: 2012

CITATION AND FINE CI 2011 49569

BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

CITATION AND FINE

Citation Number	Name, License No.
CI 2011 49569	Entirelypets.com, Unlicensed

JURISDICTION: Bus. & Prof. Code § 4005; CCR, title 16, § 1775; Bus. & Prof. Code § 4314, subd. (1), 148				
VIOLATION CODE SECTION OFFENSE AMOUNT OF				
Bus. & Prof. Code § 4161 subd. (a) & (b)	Nonresident Wholesaler Requirements/License required	\$5,000.00		

CONDUCT:

<u>Unlicensed Nonresident Wholesaler.</u> Business and Professions Code section 4161(a) states a person located outside of this state that (1) ships, sells, mails, or delivers dangerous drugs into this state or (2) sells, brokers, or distributes dangerous drugs within this state shall be considered a nonresident wholesaler and Business and Professions Code 4161 (b) states a nonresident wholesaler shall be licensed by the Board prior to shipping, selling, mailing, or delivering dangerous drugs to a site located in this state or selling, brokering, or distributing dangerous drugs within this state. Entirelypets.com was non-compliant. Specifically, from on or about 9/25/09 to on or about 10/27/09, entirelypets.com, an unlicensed wholesaler located at 710 S. 13th St. #900, PMB 384, Norfolk, NE 68701, sold dangerous drugs to Pet Meds N More, Inc., located in Los Angeles, CA without first obtaining a license from the Board. This was a violation of pharmacy law.

Wholesaler, I	Date: 3	##Amount #	se Soldijo	Ship to Name	Ship to Address
Entirelypets.com	9/25/09	\$2,120.40	Pet Meds N More, Inc.	Pet Meds N More, Inc.	11901 Santa Monica Blvd. #429, Los Angeles
Entirelypets.com	10/19/09	\$3,927.08	Pet Meds N More, Inc.	Pet Meds N More, Inc.	11901 Santa Monica Blvd. #429, Los Angeles
Entirelypets.com	10/27/09	\$2,705.30	Pet Meds N More, Inc.	Pet Meds N More, Inc.	11901 Santa Monica Blvd. #429, Los Angeles

CITATION ISSUED ON December 7-2011

TOTAL AMOUNT OF PINE(S) #\$5,000,000

PAYMENT OF EINE(S) DUE BY January 6, 2012