

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

In the Matter of the Accusation Against:

KENNETH JACK AMODEO
29782 Woodbrook Dr.
Agoura Hills, CA 91301
Pharmacist License No. RPH 37646

Respondent.

Case No. 4801

OAH No. 2014080123

DECISION AND ORDER

Pursuant to the Board of Pharmacy's action on September 30, 2015, the attached Stipulated Settlement and Disciplinary Order for Public Reprimand was adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on November 9, 2015.

It is so ORDERED on October 9, 2015.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA



By

Amy Gutierrez, Pharm.D.
Board President



California State Board of Pharmacy

1625 N. Market Blvd, N219, Sacramento, CA 95834

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BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF CONSUMER AFFAIRS
GOVERNOR EDMUND G. BROWN JR.

October 9, 2015

Kenneth Jack Amodeo
29782 Woodbrook Dr.
Agoura Hills, CA 91301

Re: LETTER OF PUBLIC REPROVAL
In the Matter of the Accusation Against:
Kenneth Jack Amodeo, Pharmacist License No. RPH 37646

Dear Mr. Amodeo:

On January 6, 2014, the Board of Pharmacy, Department of Consumer Affairs, State of California, filed an Accusation against your Pharmacist License. The Accusation alleges that you engaged in unprofessional conduct under Business and Professions Code sections 4081 and 4033, in that, after Golden State Pharmaceuticals ceased business operations in 2010, you as Pharmacist-In-Charge, failed to maintain all prescription records filled by the pharmacy and all other records at a Board licensed facility for a period of three years. Specifically, the Accusation alleges that you failed to notify the Board as to where all records of acquisition and disposition of dangerous drugs, including prescription files, were retained and maintained for the legally required period of three years from the date of making.

The Accusation further alleges that you violated title 16, section 1761, subdivision (a) of the California Code of Regulations in conjunction with sections 4059 subdivision (a) and 4060 of the Business and Professions Code in that, while you were Pharmacist-In-Charge at Golden State Pharmaceuticals, controlled substance prescriptions were furnished and dispensed without first contacting the prescribers to validate prescriptions that contained significant errors, omissions, irregularities, uncertainties, ambiguities, or alterations.

At a hearing, the Board could establish a factual basis for the charges in the Accusation. However, for the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, the Board has decided that the charges warrant a public reproof.

Accordingly, in resolution of this matter under the authority provided under Business and Professions Code section 495, the Board of Pharmacy, Department of Consumer Affairs issues this letter of public reproof.

Sincerely,

A handwritten signature in black ink that reads "Virginia Herold". The signature is written in a cursive, flowing style.

VIRGINIA HEROLD
Executive Officer
Board of Pharmacy
Department of Consumer Affairs

1 KAMALA D. HARRIS
Attorney General of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 LESLIE A. WALDEN
Deputy Attorney General
4 State Bar No. 196882
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-3465
6 Facsimile: (213) 897-2804
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:
11
12 **KENNETH JACK AMODEO**
29782 Woodbrook Dr.
13 Agoura Hills, CA 91301
Pharmacist License No. RPH 37646
14 Respondent.

Case No. 4801
OAH No. 2014080123
**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER FOR PUBLIC
REPROVAL**
[Bus. & Prof. Code § 495]

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

19
20 PARTIES

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

25 2. Respondent Kenneth Jack Amodeo (Respondent) is represented in this proceeding by
26 attorney Michael A. Dowell, whose address is: Hinshaw & Culbertson, LLP, 11601 Wilshire
27 Boulevard, Suite 800, Los Angeles, California 90025.
28

1 3. On or about April 4, 1983, the Board of Pharmacy issued Pharmacist License No.
2 RPH 37646 to Kenneth Jack Amodeo (Respondent). The Pharmacist License was in full force
3 and effect at all times relevant to the charges brought in Accusation No. 4801 and will expire on
4 February 28, 2017, unless renewed.

5 JURISDICTION

6 4. Accusation No. 4801 was filed before the Board of Pharmacy (Board), Department of
7 Consumer Affairs and is currently pending against Respondent. The Accusation and all other
8 statutorily required documents were properly served on Respondent on January 6, 2014.
9 Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation
10 No. 4801 is attached as exhibit A and incorporated herein by reference.

11 ADVISEMENT AND WAIVERS

12 5. Respondent has carefully read, fully discussed with counsel, and understands the
13 charges and allegations in Accusation No. 4801. Respondent has also carefully read, fully
14 discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary
15 Order for Public Repeval.

16 6. Respondent is fully aware of his legal rights in this matter, including the right to a
17 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
18 his own expense; the right to confront and cross-examine the witnesses against him; the right to
19 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel
20 the attendance of witnesses and the production of documents; the right to reconsideration and
21 court review of an adverse decision; and all other rights accorded by the California
22 Administrative Procedure Act and other applicable laws.

23 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
24 every right set forth above.

25 CULPABILITY

26 8. Respondent understands and agrees that the charges and allegations in Accusation
27 No. 4801, if proven at a hearing, constitute cause for imposing discipline upon his Pharmacist
28 License.

1 9. For the purpose of resolving the Accusation without the expense and uncertainty of
2 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
3 basis for the charges in the Accusation, and that Respondent hereby gives up his right to contest
4 those charges.

5 10. Respondent agrees that his Pharmacist License is subject to discipline and he agrees
6 to be bound by the Disciplinary Order below.

7 CONTINGENCY

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

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

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

1 14. In consideration of the foregoing admissions and stipulations, the parties agree that
2 the Board may, without further notice or formal proceeding, issue and enter the following
3 Disciplinary Order:

4 **DISCIPLINARY ORDER**

5 IT IS HEREBY ORDERED that Pharmacist License No. RPH 37646 issued to Respondent
6 Kenneth Jack Amodeo (Respondent) shall, by way of letter from the Board's Executive Officer,
7 be publicly reprovved. The letter shall be in substantially the same form as the letter attached as
8 Exhibit B to this stipulation.

9 IT IS HEREBY ORDERED that within ninety (90) days of the effective date of this
10 decision, Respondent shall submit to the Board or its designee, for prior approval, an appropriate
11 program of Remedial Education related to his duties as a Pharmacist -In -Charge. The program
12 of Remedial Education shall consist of at least six (6) hours, which shall be completed within
13 three (3) months at Respondent's own expense. All remedial education shall be in addition to, and
14 shall not be credited toward, continuing education (CE) courses used for license renewal
15 purposes. Following the completion of each course, the board or its designee may require the
16 Respondent, at his or her own expense, to take an approved examination to test the Respondent's
17 knowledge of the course. Any such examination failure shall require respondent to take another
18 course approved by the Board in the same subject area.

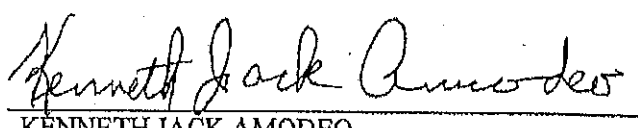
19 IT IS FURTHER ORDERED that Respondent shall pay \$6,604.00 to the Board for its costs
20 associated with the investigation and enforcement of this matter. Respondent shall pay said costs
21 within ninety (90) days of the effective date of the Board's decision adopting this agreement.

22 **ACCEPTANCE**

23 I have carefully read the above Stipulated Settlement and Disciplinary Order for Public
24 Repraval and have fully discussed it with my attorney, Michael A. Dowell. I understand the
25 stipulation and the effect it will have on my Pharmacist License. I enter into this Stipulated
26 Settlement and Disciplinary Order for Public Repraval voluntarily, knowingly, and intelligently,
27 and agree to be bound by the Decision and Order of the Board of Pharmacy.
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DATED: 5-7-15


KENNETH JACK AMODEO

Respondent

I have read and fully discussed with Respondent Kenneth Jack Amodeo the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order for Public Repeval. I approve its form and content.

DATED: 5-7-15


MICHAEL A. DOWELL

Attorney for Respondent

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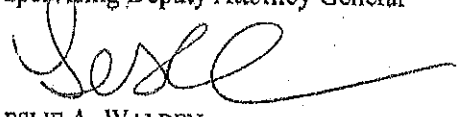
ENDORSEMENT

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

Dated:

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
MARC D. GREENBAUM
Supervising Deputy Attorney General



LESLIE A. WALDEN
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 4801

1 KAMALA D. HARRIS
Attorney General of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 LESLIE A. WALDEN
Deputy Attorney General
4 State Bar No. 196882
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-3465
6 Facsimile: (213) 897-2804
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. 4801

11 **GOLDEN STATE PHARMACEUTICALS;**
12 **KENNETH JACK AMODEO**
13 768 Calle Plano
Camarillo, CA 93012

ACCUSATION

14 Pharmacy Permit No. PHY 48647,

15 Pharmacist License No. RPH 37646

16 Respondent.
17

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20 Complainant alleges:

21 **PARTIES**

22 1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity
23 as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.

24 2. On or about August 24, 2007, the Board of Pharmacy issued Pharmacy Permit
25 Number PHY 48647 to Golden State Pharmaceuticals (Respondent). The Pharmacy Permit
26 expired on August 1, 2010, and has not been renewed.
27
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1 3. On or about April 4, 1983, the Board of Pharmacy issued Original Pharmacist License
2 Number RPH 37646 to, Kenneth Jack Amadeo ("Respondent"). The Original Pharmacist License
3 will expire on February 28, 2015, unless renewed.

JURISDICTION

4
5 4. This Accusation is brought before the Board of Pharmacy (Board), Department of
6 Consumer Affairs, under the authority of the following laws. All section references are to the
7 Business and Professions Code unless otherwise indicated.

8 5. Section 4300 of the Code states:

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

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

13 (1) Suspending judgment.

14 (2) Placing him or her upon probation.

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

16 (4) Revoking his or her license.

17 (5) Taking any other action in relation to disciplining him or her as the board in its
18 discretion may deem proper.

19

20 (d) The board may initiate disciplinary proceedings to revoke or suspend any probationary
21 certificate of licensure for any violation of the terms and conditions of probation. Upon
22 satisfactory completion of probation, the board shall convert the probationary certificate to a
23 regular certificate, free of conditions.

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

1 6. Section 4300.1 of the Code states:

2 "The expiration, cancellation, forfeiture, or suspension of a board-issued license by
3 operation of law or by order or decision of the board or a court of law, the placement of a license
4 on a retired status, or the voluntary surrender of a license by a licensee shall not deprive the board
5 of jurisdiction to commence or proceed with any investigation of, or action or disciplinary
6 proceeding against, the licensee or to render a decision suspending or revoking the license."

7 7. Section 4333 of the Code states, in pertinent part, that all prescriptions filled by a
8 pharmacy and all other records required by Section 4081 shall be maintained on the premises and
9 available for inspection by authorized officers of the law for a period of at least three years. In
10 cases where the pharmacy discontinues business, these records shall be maintained in a
11 board-licensed facility for at least three years.

12 8. Section 4081 of the Code states:

13 "(a) All records of manufacture and of sale, acquisition, or disposition of dangerous drugs
14 or dangerous devices shall be at all times during business hours open to inspection by authorized
15 officers of the law, and shall be preserved for at least three years from the date of making. A
16 current inventory shall be kept by every manufacturer, wholesaler, pharmacy, veterinary
17 food-animal drug retailer, physician, dentist, podiatrist, veterinarian, laboratory, clinic, hospital,
18 institution, or establishment holding a currently valid and unrevoked certificate, license, permit,
19 registration, or exemption under Division 2 (commencing with Section 1200) of the Health and
20 Safety Code or under Part 4 (commencing with Section 16000) of Division 9 of the Welfare and
21 Institutions Code who maintains a stock of dangerous drugs or dangerous devices.

22 "(b) The owner, officer, and partner of any pharmacy, wholesaler, or veterinary food-animal
23 drug retailer shall be jointly responsible, with the pharmacist-in-charge or representative-in-
24 charge, for maintaining the records and inventory described in this section.

25 "(c) The pharmacist-in-charge or representative-in-charge shall not be criminally
26 responsible for acts of the owner, officer, partner, or employee that violate this section and of
27 which the pharmacist-in-charge or representative-in-charge had no knowledge, or in which he or
28 she did not knowingly participate."

1 licensee or registrant to perform the functions authorized by his license or registration in a manner
2 consistent with the public health, safety, or welfare."

3 12. California Code of Regulations, title 16, section 1708.2 provides:

4 "Any permit holder shall contact the board prior to transferring or selling any dangerous
5 drugs, devices or hypodermics inventory as a result of termination of business or bankruptcy
6 proceedings and shall follow official instructions given by the board applicable to the
7 transaction."

8 13. California Code of Regulations, title 16, section 1761 provides:

9 "(a) No pharmacist shall compound or dispense any prescription which contains any
10 significant error, omission, irregularity, uncertainty, ambiguity or alteration. Upon receipt of any
11 such prescription, the pharmacist shall contact the prescriber to obtain the information needed to
12 validate the prescription."...."

13 COSTS

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

18 FIRST CAUSE FOR DISCIPLINE

19 (Golden State Pharmaceuticals - Failure to File Discontinuance of Business)

20 15. Respondent Golden State Pharmaceuticals is subject to disciplinary action under title
21 16, section 1708.2 of the California Code of Regulations (CCR) in that Respondent failed to
22 contact the Board prior to transferring or selling any dangerous drugs, devices or hypodermic
23 inventory as a result of termination of its business. The circumstances are as follows:

24 16. On or about April 29, 2011, an onsite inspection by the Board of Pharmacy revealed
25 that another business was operating out of the business address licensed to Respondent located at
26 768 Calle Plano, Camarillo, CA 93012. Respondent failed to submit or file a Discontinuance of
27 Business form with the Board upon the termination of its business.

28

1 SECOND CAUSE FOR DISCIPLINE

2 (Golden State Pharmaceuticals - Failure to Maintain Prescription Records)

3 17. Respondent Golden State Pharmaceuticals is subject to disciplinary action under
4 section 4333 in conjunction with 4081 of the Code in that it failed to maintain all prescriptions
5 filled by the pharmacy and all other records on its premises for inspection by authorized officers
6 for a period of three years. The circumstances are as follows:

7 18. On or about June 16, 2010 Respondent Golden State Pharmaceuticals terminated its
8 business operations located at 768 Calle Plano, Camarillo, CA 93012, and subsequently failed to
9 notify the Board prior to transferring, selling or disposing of all dangerous drugs and devices. In
10 addition, Respondent failed to notify the Board as to where all records of acquisition and
11 disposition of dangerous drugs, including prescription files, were retained and maintained for the
12 legally required period of three years from the date of making.

13 THIRD CAUSE FOR DISCIPLINE

14 (Golden State Pharmaceuticals - Unauthorized Prescriptions)

15 19. Respondent Golden State Pharmaceuticals is subject to disciplinary action under title
16 16, section 1761, subdivision (a) of the CCR in conjunction with section 4059 subdivision (a) and
17 4060 of the Code in that it failed to contact the prescribers to validate prescriptions prior to
18 compounding or dispensing such prescriptions which contained significant errors, omissions,
19 irregularities, uncertainties, ambiguities, or alterations. The circumstances are as follows:

20 20. From on or about January 2009 to June 2010, Respondent Golden State
21 Pharmaceuticals furnished and dispensed approximately 1000 controlled substance prescriptions,
22 which were not prescribed or authorized by Douglas Mills, M.D.. Specifically, Respondent failed
23 to obtain validation of the prescriptions from Dr. Mills who was not employed by Frontline
24 Medical Associates, the prescribing medical group, since September 2007, and had not been
25 practicing medicine in the State of California since October 2009.

26 ///

27 ///

1 FOURTH CAUSE FOR DISCIPLINE

2 (Kenneth Jack Amodeo - Failure to Maintain Prescription Records)

3 21. Respondent Kenneth Jack Amodeo is subject to disciplinary action under section
4 4333 in conjunction with 4081 of the Code in that he failed to maintain all prescriptions filled by
5 the pharmacy and all other records on its premises for inspection by authorized officers for a
6 period of three years. The circumstances are as follows:

7 22. On or about June 16, 2010, while Respondent Kenneth Jack Amodeo was the
8 Pharmacist-in-Charge, Golden State Pharmaceuticals terminated its business operations located at
9 768 Calle Plano, Camarillo, CA 93012. Respondent Amodeo failed to notify the Board of the
10 termination of business practices prior to transferring, selling or disposing of all dangerous drugs
11 and devices. In addition, Respondent Amodeo failed to notify the Board as to where all records of
12 acquisition and disposition of dangerous drugs, including prescription files, were retained and
13 maintained for the legally required period of three years from the date of making.

14 FIFTH CAUSE FOR DISCIPLINE

15 (Kenneth Jack Amodeo - Unauthorized Prescriptions)

16 23. Respondent Kenneth Jack Amodeo is subject to disciplinary action under Title 16,
17 section 1761, subdivision (a) of the CCR in conjunction with section 4059 subdivision (a) and
18 4060 of the Code in that while he was the Pharmacist-In-Charge, the pharmacist(s) who dispensed
19 the prescriptions failed to contact the prescribers to validate prescriptions prior to compounding
20 or dispensing such prescriptions, which contained significant errors, omissions, irregularities,
21 uncertainties, ambiguities, or alterations. The circumstances are as follows:

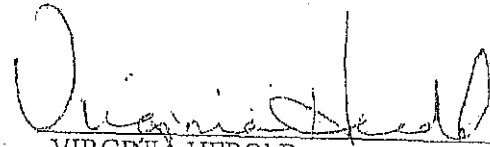
22 24. From on or about January 2009 to June 2010, Respondent Kenneth Jack Amodeo was
23 the Pharmacist-In-Charge at Golden State Pharmaceuticals. During this time frame,
24 approximately 1000 controlled substance prescriptions were furnished and dispensed, which were
25 not prescribed or authorized by Douglas Mills, M.D.. Specifically, the pharmacist(s) failed to
26 obtain validation of the prescriptions from Dr. Mills who was not employed by Frontline Medical
27 Associates, the prescribing medical group, since September 2007 and had not been practicing
28 medicine in the State of California since October 2009.

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. Revoking or suspending Pharmacy Permit Number PHY 48647, issued to Golden State Pharmaceuticals and PIC Kenneth Jack Amodeo.
2. Revoking or suspending Pharmacist license Number RPH 48647, issued to Kenneth Jack Amodeo;
3. Ordering Kenneth Jack Amodeo and Golden State Pharmaceuticals to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
4. Taking such other and further action as deemed necessary and proper.

DATED: 1/6/14



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

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Exhibit B

Letter of Public Repeal in Case No. 4801

Date: _____

Kenneth Jack Amodeo
29782 Woodbrook Dr.
Agoura Hills, CA 91301

Re: LETTER OF PUBLIC REPROVAL
In the Matter of the Accusation Against:
Kenneth Jack Amodeo, Pharmacist License No. RPH 37646

Dear Mr. Amodeo :

On January 6, 2014, the Board of Pharmacy, Department of Consumer Affairs, State of California, filed an Accusation against your Pharmacist License. The Accusation alleges that you engaged in unprofessional conduct under Business and Professions Code sections 4081 and 4033, in that, after Golden State Pharmaceuticals ceased business operations in 2010, you as Pharmacist-In-Charge, failed to maintain all prescription records filed by the pharmacy and all other records at a Board licensed facility for a period of three years. Specifically, the Accusation alleges that you failed to notify the Board as to where all records of acquisition and disposition of dangerous drugs, including prescription files, were retained and maintained for the legally required period of three years from the date of making.

The Accusation further alleges that you violated title 16, section 1761, subdivision (a) of the California Code of Regulations in conjunction with sections 4059 subdivision (a) and 4060 of the Business and Professions Code in that, while you were Pharmacist-In-Charge at Golden State Pharmaceuticals, controlled substance prescriptions were furnished and dispensed without first contacting the prescribers to validate prescriptions that contained significant errors, omissions, irregularities, uncertainties, ambiguities, or alterations.

At a hearing, the Board could establish a factual basis for the charges in the Accusation. However, for the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, the Board has decided that the charges warrant a public reproof.

Accordingly, in resolution of this matter under the authority provided under Business and Professions Code section 495, the Board of Pharmacy, Department of Consumer Affairs issues this letter of public reproof.

Sincerely,

VIRGINIA HEROLD
Executive Officer
Board of Pharmacy
Department of Consumer Affairs