

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

In the Matter of the Accusation Against:

**SPECIALTY COMPOUNDING LLC, DBA
SPECIALTY COMPOUNDING LLC
211 S. Bell Boulevard
Cedar Park, TX 78613**

**Nonresident Pharmacy License No. NRP
1021**

**Nonresident Compounding License No. NSC
99603**

Respondent.

Case No. 4917

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 December 4, 2015.

It is so ORDERED on November 4, 2015.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA



By

Amy Gutierrez, Pharm.D.
Board President

1 KAMALA D. HARRIS
Attorney General of California
2 GREGORY J. SALUTE
Supervising Deputy Attorney General
3 DESIREE I. KELLOGG
Deputy Attorney General
4 State Bar No. 126461
600 West Broadway, Suite 1600
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 645-2996
7 Facsimile: (619) 645-2061
Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

Case No. 4917

12 **SPECIALTY COMPOUNDING LLC**
13 **DBA SPECIALTY COMPOUNDING LLC**
14 **211 S. Bell Boulevard**
Cedar Park, TX 78613

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

15 **Nonresident Pharmacy License No. NRP**
16 **1021**
17 **Nonresident Compounding License No. NSC**
99603

18 Respondent.

19
20
21 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
22 entitled proceedings that the following matters are true:

23 PARTIES

24 1. Virginia Herold (Complainant) is the Executive Officer of the Board of Pharmacy.
25 She brought this action solely in her official capacity and is represented in this matter by Kamala
26 D. Harris, Attorney General of the State of California, by Desiree I. Kellogg, Deputy Attorney
27 General.
28

1 time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its
2 Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or
3 effect, except for this paragraph, it shall be inadmissible in any legal action between the parties,
4 and the Board shall not be disqualified from further action by having considered this matter.

5 15. The parties understand and agree that Portable Document Format (PDF) and facsimile
6 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
7 signatures thereto, shall have the same force and effect as the originals.

8 16. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
9 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
10 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
11 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
12 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
13 writing executed by an authorized representative of each of the parties.

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

17 **DISCIPLINARY ORDER**

18 IT IS HEREBY ORDERED that Nonresident Compounding License No. NSC 99603
19 issued to Specialty Compounding LLC, doing business as Specialty Compounding LLC
20 (Respondent) is surrendered and accepted by the Board of Pharmacy.

21 1. The surrender of Respondent's Nonresident Compounding License No. NSC 99603
22 and the acceptance of the surrendered license by the Board shall constitute the imposition of
23 discipline against Respondent. This stipulation constitutes a record of the discipline and shall
24 become a part of Respondent's license history with the Board.

25 2. Respondent shall lose all rights and privileges afforded by the Nonresident
26 Compounding License as of the effective date of the Board's Decision and Order.

27
28

1 3. Respondent shall cause to be delivered to the Board its pocket license and, if one was
2 issued, its wall certificate for Nonresident Compounding License No. NSC 99603 on or before
3 the effective date of the Decision and Order.

4 4. If Respondent ever applies for a Nonresident Compounding License or files a petition
5 for reinstatement in the State of California, the Board shall treat it as a new application for
6 licensure. Respondent must comply with all the laws, regulations, and procedures for licensure in
7 effect at the time the application or petition is filed, and all of the charges and allegations
8 contained in First Amended Accusation No. 4917 shall be deemed to be true, correct and
9 admitted by Respondent when the Board determines whether to grant or deny the application or
10 petition.

11 IT IS HEREBY FURTHER ORDERED that Nonresident Pharmacy License No. NRP 1021
12 issued to Respondent is revoked. However, the revocation is stayed as to Nonresident Pharmacy
13 License No. NRP 1021 and Respondent is placed on probation for three (3) years on the
14 following terms and conditions.

15 1. **Obey All Laws**

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

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

- 19 an arrest or issuance of a criminal complaint for violation of any provision of the
20 Pharmacy Law, state and federal food and drug laws, or state and federal controlled
21 substances laws
- 22 a plea of guilty or nolo contendere in any state or federal criminal proceeding to any
23 criminal complaint, information or indictment
- 24 a conviction of any crime
- 25 discipline, citation, or other administrative action filed by any state or federal agency
26 which involves respondent's nonresident pharmacy license or which is related to the
27 practice of pharmacy or the manufacturing, obtaining, handling or distributing,
28 billing, or charging for any drug, device or controlled substance.

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

2 **2. Report to the Board**

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

11 **3. Interview with the Board**

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

17 **4. Cooperate with Board Staff**

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

21 **5. Reimbursement of Board Costs**

22 As a condition precedent to successful completion of probation, respondent shall pay to the
23 board its costs of investigation and prosecution in the amount of \$5,000.00. Respondent shall
24 make said payments as follows: \$500.00 on the first of each month until paid, commencing with
25 the effective date of the Decision adopting the Stipulation. There shall be no deviation from this
26 schedule absent prior written approval by the board or its designee. Failure to pay costs by the
27 deadline(s) as directed shall be considered a violation of probation.

28 The filing of bankruptcy by respondent shall not relieve respondent of their responsibility to

1 reimburse the board its costs of investigation and prosecution.

2 **6. Probation Monitoring Costs**

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

7 **7. Status of License**

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

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

17 **8. License Surrender While on Probation/Suspension**

18 Following the effective date of this decision, should respondent discontinue business,
19 respondent may tender the premises license to the board for surrender. The board or its designee
20 shall have the discretion whether to grant the request for surrender or take any other action it
21 deems appropriate and reasonable. Upon formal acceptance of the surrender of the license,
22 respondent will no longer be subject to the terms and conditions of probation.

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

27 Respondent shall also, by the effective date of this decision, arrange for the continuation of
28 care for ongoing patients of the pharmacy by, at minimum, providing a written notice to ongoing

1 patients that specifies the anticipated closing date of the pharmacy and that identifies one or more
2 area pharmacies capable of taking up the patients' care, and by cooperating as may be necessary
3 in the transfer of records or prescriptions for ongoing patients. Within five days of its provision
4 to the pharmacy's ongoing patients, Respondent shall provide a copy of the written notice to the
5 board. For the purposes of this provision, "ongoing patients" means those patients for whom the
6 pharmacy has on file a prescription with one or more refills outstanding, or for whom the
7 pharmacy has filled a prescription within the preceding sixty (60) days.

8 Respondent may not apply for any new licensure from the board for three (3) years from the
9 effective date of the surrender. Respondent shall meet all requirements applicable to the license
10 sought as of the date the application for that license is submitted to the board.

11 Respondent further stipulates that he or she shall reimburse the board for its costs of
12 investigation and prosecution prior to the acceptance of the surrender.

13 **9. Notice to Employees**

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

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

27 **10. Owners and Officers: Knowledge of the Law**

28 Respondent shall provide, within thirty (30) days after the effective date of this decision,

1 signed and dated statements from its owners, including any owner or holder of ten percent (10%)
2 or more of the interest in respondent or respondent's stock, and any officer, stating under penalty
3 of perjury that said individuals have read and are familiar with state and federal laws and
4 regulations governing the practice of pharmacy. The failure to timely provide said statements
5 under penalty of perjury shall be considered a violation of probation.

6 **11. Posted Notice of Probation**

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

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

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

15 **12. Violation of Probation**

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

21 If respondent violates probation in any respect, the board, after giving respondent notice
22 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that
23 was stayed. Notice and opportunity to be heard are not required for those provisions stating that a
24 violation thereof may lead to automatic termination of the stay and/or revocation of the license. If
25 a petition to revoke probation or an accusation is filed against respondent during probation, the
26 board shall have continuing jurisdiction and the period of probation shall be automatically
27 extended until the petition to revoke probation or accusation is heard and decided.

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

13. Completion of Probation

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

ACCEPTANCE

I, Raymond L. Solano, am the managing member of Respondent. On behalf of Respondent, I have carefully read the Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney Deborah A. Pearce. I understand the stipulation and the effect it will have on Respondent's Nonresident Compounding License. On behalf of Respondent, 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: 8/24/15 Raymond L. Solano
RAYMOND L. SOLANO FOR
SPECIALTY COMPOUNDING LLC, DBA
SPECIALTY COMPOUNDING
Respondent

ACCEPTANCE

I, Raymond L. Solano, am the managing member of Respondent. On behalf of Respondent, I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Deborah A. Pearce. I understand the stipulation and the effect it will have on Respondent's Nonresident Pharmacy License. On behalf of Respondent, 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: 8/26/15 Raymond L. Solano
RAYMOND L. SOLANO FOR SPECIALTY
COMPOUNDING LLC, DBA SPECIALTY
COMPOUNDING LLC
Respondent

1 I have read and fully discussed with Respondent Specialty Compounding LLC, doing
2 business as Specialty Compounding LLC the terms and conditions and other matters contained in
3 the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

4
5 DATED: 08/26/2015



6 DEBORAH A. PEARCE
7 Attorney for Respondent

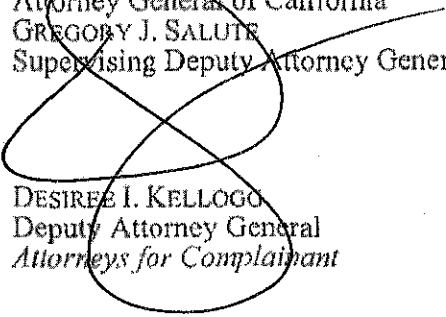
8 ENDORSEMENT

9 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
10 submitted for consideration by the Board of Pharmacy.

11 DATED: 8/26/15

12 Respectfully submitted,

13 KAMALA D. HARRIS
14 Attorney General of California
15 GREGORY J. SALUTE
16 Supervising Deputy Attorney General



17 DESIREE I. KELLOGG
18 Deputy Attorney General
19 Attorneys for Complainant

20 SD2013706332/70945192.doc

Exhibit A

First Amended Accusation No. 4917

1 KAMALA D. HARRIS
Attorney General of California
2 LINDA K. SCHNEIDER
Supervising Deputy Attorney General
3 DESIREE I. KELLOGG
Deputy Attorney General
4 State Bar No. 126461
110 West "A" Street, Suite 1100
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 645-2996
7 Facsimile: (619) 645-2061
Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

Case No. 4917

12 **SPECIALTY COMPOUNDING LLC, DBA**
13 **SPECIALTY COMPOUNDING LLC**
14 **211 S. Bell Boulevard**
Cedar Park, TX 78613

FIRST AMENDED
ACCUSATION

15 **Nonresident Pharmacy License No. NRP 1021**
16 **Nonresident Compounding License No. NSC 99603**

17 Respondent.

18
19 Complainant alleges:

20 **PARTIES**

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

24 2. On or about October 20, 2010, the Board of Pharmacy issued Nonresident Pharmacy
25 License Number NRP 1021 to Specialty Compounding LLC, doing business as Specialty
26 Compounding LLC. The Nonresident Pharmacy License expired on October 1, 2013, was
27 renewed and will expire on October 1, 2016, unless renewed.
28

- (2) Altering the strength of a drug
- (3) Combining components or active ingredients
- (4) Preparing a drug product from chemicals or bulk drug substances
- ...

COST RECOVERY

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

DRUG

16. Calcium gluconate is used as a calcium replacement and is a dangerous drug pursuant to Business and Professions Code section 4022.

FACTUAL ALLEGATIONS

17. On or about November 7, 2007, the Texas State Board of Pharmacy issued Pharmacy License Number 25802 to Respondent which will expire on November 30, 2015, unless renewed.

18. From approximately January 21, 2010 through August 9, 2013, Respondent compounded sterile and non-sterile injectable compounded drug products at their compounding facility in Texas and furnished certain of those drug products to patients in California.

19. On or about August 7, 2012, the Texas State Board of Pharmacy entered Agreed Board Order #K-10-065-B in a disciplinary action entitled "*In the matter of Specialty Compounding, LLC.*" The Order was based on allegations that Respondent unlawfully engaged in the practice of pharmacy, in that Respondent dispensed and sold 224 prescription drugs to patients in 10 states where Respondent did not possess a license from the respective states' board of pharmacy or other state licensing entity necessary to operate in each state as a pharmacy or wholesale facility. The Order imposed a \$5,000.00 administrative penalty and required Respondent to develop and implement certain policies and procedures.

20. On August 9, 2013, the FDA issued a Health Alert, notifying health care professionals not to use any sterile products supplied by Respondent because there were reports

1 of possible adverse effects associated with the calcium gluconate infusions produced by
2 Respondent. On that same day, Respondent issued a Notice voluntarily recalling all of its
3 unexpired compounded sterile injectable products dispensed since May 9, 2013.

4 21. On August 9, 2013, the Board issued a Cease and Desist Order, directing Respondent
5 not to ship, furnish, transfer, or provide, either directly or indirectly compounded sterile injectable
6 drugs into or through California. On or about August 23, 2013, Respondent entered into a
7 Stipulated Extension of that Cease and Desist Order, until a decision of the Board of Pharmacy
8 following the filing of an accusation and a hearing.

9 22. On November 15, 2013, the FDA released laboratory results from samples it obtained
10 of Respondent's sterile injectable products taken at Respondent's sterile drug compounding and
11 manufacturing facility and at various health care facilities. The FDA's analysis of these samples
12 identified the following contaminants in recalled products: (1) Lot Number 05142013M14 of
13 calcium gluconate 10% tested positive for the presence of non-viable mold-like hyphae *Kocuria*
14 *Varians* and *Kocuria Krinae* and (2) Lot Number 0792013M16 of calcium gluconate 2gm in
15 100ml sodium chloride, 0.9% injectable tested positive for the presence of *Gardnerella*
16 *Vaginalis*, *Streptococcus Pluranimalium* and *Streptococcus Thoraltensis*. The FDA opined that
17 "based on our inspectional findings and the sample results, we do not believe [Respondent]
18 should perform any sterile drug production at this time."

19 23. On or about February 11, 2014, the Texas State Board of Pharmacy entered Agreed
20 Board Order # K-13-015 B in a disciplinary action entitled "*In the matter of Specialty*
21 *Compounding, LLC*." The Order was based on allegations that Respondent's pharmacist-in-
22 charge failed to properly supervise pharmacy personnel and an employee engaged in the duties of
23 a pharmacy technician trainee without a valid registration. The Order imposed a \$3,000
24 administrative penalty and required Respondent to develop and implement certain policies and
25 procedures.

26 24. On or about February 23, 2015, the United States of America filed a Complaint for
27 Permanent Injunction against Specialty Compounding LLC, Raymond L. Solano III and William
28 L. Swail in *United States of America v. Specialty Compounding LLC, et al.*, Case Number

1 A15CV0148LY, alleging among other things that Respondents compounded drugs that were
2 adulterated and misbranded due to filth, insanitary conditions and current good manufacturing
3 practice violations and that Respondent's actions violated numerous federal laws and regulations.
4 On or about March 10, 2015, the Consent Decree of Permanent Injunction was entered against
5 Respondent, precluding among other things, the compounding of sterile drug products.

6 25. On or about August 4, 2015, the Texas State Board of Pharmacy entered Agreed
7 Board Order # K-13-029 in a disciplinary action entitled "*In the matter of Specialty*
8 *Compounding, LLC.*" The Order was based on the entry of the Consent Decree of Permanent
9 Injunction in *United States v. Specialty Compounding LLC, et al.* Case Number A15CV0148LY,
10 United States District Court for the Western District of Texas. The Order placed Respondent on
11 probation for a period of two years, ordered them not to violate any pharmacy or drug statute or
12 rule of Texas, another state, or the United States with respect to pharmacy, controlled substances,
13 and dangerous drugs, ordered them to pay a probation fee and comply with other terms of
14 probation, including developing and implementing policies and procedures for a Continuous
15 Quality Improvement Program and retaining a sterile compounding consultant.

16 **FIRST CAUSE FOR DISCIPLINE**

17 **(Manufacture, Sell, Deliver, Hold or Offer for Sale Adulterated Sterile Injectable Drugs)**

18 26. Respondent is subject to disciplinary action for unprofessional conduct under Code
19 section 4301(j), for violating Health and Safety Code section 111295, in that it manufactured,
20 sold, delivered, held or offered for sale, sterile injectable drugs that were adulterated within the
21 meaning of Health and Safety Code sections 111250 and 111255, as set forth in paragraphs 17
22 through 25, which are incorporated herein by reference.

23 **SECOND CAUSE FOR DISCIPLINE**

24 **(Adulterated Sterile Injectable Drugs)**

25 27. Respondent is subject to disciplinary action for unprofessional conduct under Code
26 section 4301(j), for violating Health and Safety Code section 111300, in that it adulterated sterile
27 injectable drugs within the meaning of Health and Safety Code sections 111250 and 111255, as
28 set forth in paragraphs 17 through 25, which are incorporated herein by reference.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THIRD CAUSE FOR DISCIPLINE

(Out of State Discipline)

28. Respondent is subject to disciplinary action for unprofessional conduct under Code section 4301(n), in that it was disciplined by the Texas State Board of Pharmacy as described in paragraphs 17 through 25 above, which are incorporated herein by reference.

FOURTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

29. Respondent is subject to disciplinary action for unprofessional conduct under Code section 4301, in that it engaged in the activities described in paragraphs 17 through 25 above, which are incorporated herein by reference.

///

///

///

1 **PRAYER**

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

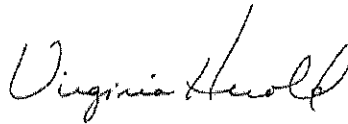
4 1. Revoking or suspending Nonresident Pharmacy License Number NRP 1021, issued to
5 Specialty Compounding LLC, doing business as Specialty Compounding LLC;

6 2. Revoking or suspending Nonresident Compounding License Number NSC 99603,
7 issued to Specialty Compounding LLC, dba Specialty Compounding LLC;

8 3. Ordering Specialty Compounding LLC, doing business as Specialty Compounding
9 LLC to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of
10 this case, pursuant to Business and Professions Code section 125.3;

11 4. Taking such other and further action as deemed necessary and proper.

12 DATED: August 24, 2015

13 

14
15 VIRGINIA HEROLD
16 Executive Officer
17 Board of Pharmacy
18 Department of Consumer Affairs
19 State of California
20 *Complainant*

21 SD2013706332/81132939.docx
22
23
24
25
26
27
28