

**ORIGINAL**

1 BILL LOCKYER, Attorney General  
of the State of California  
2 SUSAN MELTON WILSON, State Bar No. 106092  
Deputy Attorney General  
3 Department of Justice  
300 South Spring Street, Suite 500  
4 Los Angeles, California 90013  
Telephone: (213) 897-4942  
5  
6 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. 2074

11 Kramer's Pharmacy, INC. d.b.a. )  
12 Kramer's Pharmacy )  
29525 Canwood Street )  
13 Agoura, CA 91301 )  
Herman Leo Kramer, )  
14 Pharmacist-in-Charge )  
Pharmacy Permit No. PHY22652 )

**STIPULATION, DECISION  
AND ORDER**

15 Herman Leo Kramer )  
16 4056 Whitesale Circle )  
Westlake Village, CA 91361 )  
17 Pharmacist License No. RPH 20744 )

18 Respondents. )  
19  
20

21 In the interest of a prompt and speedy settlement of this matter, consistent  
22 with the public interest and the responsibility of the Board of Pharmacy (hereinafter "Board") the  
23 parties submit this Stipulation, Decision and Order to the Board for its approval as the final  
24 disposition of the Accusation.

25 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES TO THE  
26 ABOVE-ENTITLED CASE that the following matters are true:

27 1. Accusation No. 2074 is currently pending against Respondent Kramer's  
28 Pharmacy, Inc., formerly licensed to do business as Kramer's Pharmacy ( hereinafter  
"Respondent Pharmacy").

1                   The Board issued Original Permit Number PHY 22652 to Respondent Pharmacy  
2 on or about October 1, 1982. The address of record was 29525 Canwood Street, Agoura,  
3 California 91301 and the Corporate officers were: Respondent Herman Leo Kramer, President;  
4 Barbara Kramer, Vice President; Brenda Kramer, Secretary; and, Respondent Herman Leo  
5 Kramer, RPH 20744, was the Pharmacist-in-Charge. The license was in full force and effect  
6 until April 7, 2000, at which time the pharmacy changed ownership to KPI, Inc., pharmacy  
7 permit PHY 44643. The Accusation is also brought against Respondent Herman Leo Kramer, as  
8 an individual licensee and Pharmacist-in-Charge of Respondent Pharmacy ( "Respondent  
9 Kramer"). Respondent Kramer was initially issued Original Licentiate Number RPH 20744 on  
10 April 30, 1970.

11                   2.       Said Accusation was filed by Complainant PATRICIA F. HARRIS in her  
12 official capacity as Executive Officer, Board of Pharmacy, Department of Consumer Affairs,  
13 State of California, (hereinafter referred to as "Board"). The Accusation, together with all other  
14 statutorily required documents, was duly served on the Respondents on or about July 7, 2000 and  
15 Respondents filed their timely Notice of Defense contesting the Accusation. A copy of  
16 Accusation No. 2074 is attached hereto as **Exhibit "A"** and incorporated herein by reference as  
17 though fully set forth.

18                   3.       At all times relevant herein, Respondent Pharmacy held Pharmacy  
19 Permit Number PHY 22652 issued to Kramer's Pharmacy, Inc., d.b.a. Kramer's Pharmacy. At  
20 all times relevant herein, Respondent Herman Leo Kramer held Pharmacist Licentiate Number  
21 RPH 20744 and was pharmacist-in-charge of Respondent Pharmacy.

22                   4       Complainant herein is represented by the Attorney General of the State  
23 of California, Susan Melton Wilson, Deputy Attorney General.

24                   5.       Respondent Pharmacy appears by and through the president of the  
25 corporation, Herman Leo Kramer, and is represented by Law Offices of Van Etten, Suzumoto &  
26 Becket, by Herbert L. Weinberg. Herman Leo Kramer is also advised and represented as an  
27 individual Respondent by Van Etten, Suzumoto & Becket, by Attorney Weinberg. .

28                   6.       Respondents and each of them have carefully read the Accusation.

1 Respondents understand the nature of the charges stated in the Accusation and that the charges  
2 and allegations constitute prima facie cause for imposing discipline upon their licenses.

3           7. Respondents and each of them are fully aware of their right to a hearing  
4 on the charges and allegations contained in said Accusation, their rights to reconsideration,  
5 appeal and all other rights accorded pursuant to the California Business and Professions Code  
6 and freely and voluntarily waive such rights.

7           8. Respondents and each of them understand that no hearing will be held  
8 and no witnesses will be called and examined before the Board, no evidence or documents will  
9 be introduced, and that the Board, in making its Decision and Order on the Accusation will only  
10 have before it the Accusation and this Stipulation. Respondents understand that by entering into  
11 this Stipulation they give up their right to confront and cross-examine any and all witnesses  
12 against them.

13           9. Respondents and each of them understand that by entering into this  
14 Stipulation they give up their right to seek reconsideration or to appeal to the courts of the State  
15 of California any Decision and Order of the Board on the Accusation, and that by entering into  
16 this Stipulation the Board may enter a final non-reviewable Decision and Order on the  
17 Accusation.

18           10. The following admissions are for purposes of this Stipulation only, and are  
19 made with the express understanding that any admissions made here are not to be used or  
20 admissible in any collateral proceeding between any Respondent (s) and any party or parties  
21 other than the Board of Pharmacy:

22           (a) Individual Respondent Herman Leo Kramer understands that the  
23 charges and allegations in the Accusation, if proven at hearing, constitute cause for imposing  
24 discipline upon his pharmacist license. For the purpose of resolving Accusation No. 2074  
25 without the expense and uncertainty of further proceedings, Respondent agrees that, at hearing,  
26 Complainant could establish a factual basis for the charges in the Accusation. Accordingly,  
27 Respondent Kramer hereby gives up his right to contest those charges, and agrees to be bound  
28 by the Board's imposition of discipline as set forth in the Order below.

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1 (b) Respondent Pharmacy has subjected its license to discipline for  
2 violation of Business and Professions Code sections 4300 and 4301, for unprofessional conduct  
3 within the meaning of Code sections 4301 (b), (c), (d), (i), (j), (o) and (p), by reason of violations  
4 of California Code of Regulations section 1761 and Health and Safety Code section 11153, by  
5 filling prescriptions not intended for a valid medical purpose as described more fully in the  
6 Accusation (Exhibit A) herein.

7 (c) Respondents and each of them admit that the Board has  
8 jurisdiction to bring and adjudicate all charges stated in the Accusation herein, and to impose  
9 disciplinary penalties in this matter.

10 (d) In view of and based on the foregoing admissions, Respondents,  
11 and each of them agree to resolve charges and allegations made in the Accusation herein by the  
12 Board's imposition of penalty as set out in the Order below.

13 10. It is stipulated and agreed that the Board had incurred costs within the  
14 meaning of Business and Professions Code § 125.3 in the sum of four thousand dollars  
15 (\$4,000.00) in investigation and prosecution of this matter. In consideration of this settlement  
16 agreement, Respondent Herman Leo Kramer agrees to reimburse said costs, and shall pay the  
17 sum of four thousand dollars (\$4,000.00) to the Board within 60 days of the effective date(s) of  
18 this order.

19 12. This stipulation is solely for purposes of this proceeding, for any other  
20 disciplinary proceedings by the Board, and for any petition for reinstatement, reduction of  
21 penalty, or application for re-licensure, and shall have no force or effect in any other case or  
22 proceeding. In any future proceedings before the Board, or in which the Board of Pharmacy and  
23 any Respondent(s) are parties, Respondents and each of them may not deny the allegations  
24 admitted in paragraph 10 above, and said allegations shall be deemed true without requiring the  
25 Board to present any further evidence.

26 13. In the event this settlement is not adopted by the Board, this Stipulation  
27 will not become effective and may not be used for any purpose.

28 14. Respondents, and each of them, understand that, in deciding whether to

1 adopt this Stipulation, the Board may receive oral and written presentations from, and make  
2 inquiries of the complainant, her attorneys, the Board's attorneys, consulting experts and the  
3 Board's enforcement committee.

4 15. A facsimile signature on this document shall be binding as an original  
5 signature. Respondents and each of them expressly authorize use of facsimile signatures in lieu  
6 of original signatures for all purposes relevant to the disposition of this matter and enforcement  
7 of the Stipulation.

8 **WHEREFORE IT IS FURTHER STIPULATED AND AGREED** by and  
9 between the parties that the Board may issue the following disciplinary decision or order as its  
10 decision and order in the matter of Accusation Number 2074.

11 **IT IS HEREBY ORDERED AS FOLLOWS:**

12 **Re: Respondent KRAMER'S PHARMACY**

13 Pharmacy Permit Number PHY 22652 issued to Kramer's Pharmacy, Inc., d.b.a.  
14 Kramer's Pharmacy **is revoked**. An Order of Revocation will be inserted into the license history  
15 of this Respondent, said license having been canceled on or about April 7, 2000.

16 **Re: Individual Respondent HERMAN LEO KRAMER**

17 The license of Respondent is hereby revoked. However, said revocation is stayed,  
18 and the license placed on probation for three (3) years upon the following terms and conditions,  
19 which must be complied with during the probation:

- 20 **1. Obey All Laws.** Respondent shall obey all federal, state and regulations  
21 substantially related or governing the practice of pharmacy.
- 22 **2. Reporting to the Board.** Respondent shall report to the Board or its  
23 designee quarterly. The report shall be made either in person or in writing, as directed. If the  
24 final probation report is not made as directed, probation shall be extended automatically until such  
25 time as the final report is made.
- 26 **3. Interview with the Board.** Upon receipt of reasonable notice, Respondent  
27 shall appear in person for interviews with the Board or its designee upon request at various  
28 intervals at a location to be determined by the Board or its designee. Failure to appear for a

1 scheduled interview without prior notification to Board staff shall be considered a violation of  
2 probation.

3           **4. Cooperation with Board Staff.** Respondent shall cooperate with the  
4 Board's inspection program and in the Board's monitoring and investigation of the Respondent's  
5 compliance with the terms and conditions of his probation. Failure to cooperate shall be  
6 considered a violation of probation.

7           **5. Peer Review.** Respondent shall submit to peer review as deemed necessary  
8 by the Board.

9           **6. Continuing Education.** Respondent shall provide evidence of efforts to  
10 maintain skill and knowledge as a pharmacist as directed by the Board.

11           **7. Notice to Employers.** Respondent shall notify all present and prospective  
12 employers of the decision in case no. 2049-A and the terms, conditions and restrictions imposed  
13 on Respondent by the decision.

14                         Within thirty (30) days of the effective date of this decision, and within  
15 fifteen (15) days of Respondent undertaking new employment, Respondent shall cause his  
16 employer to report to the Board in writing acknowledging the employer has read the decision in  
17 case no. 2049-A.

18                         If Respondent works for or is employed by or through a pharmacy  
19 employment service, Respondent must notify the pharmacist-in-charge and/or owner at every  
20 pharmacy at which he is to be employed or used of the fact and terms of the decision in case no.  
21 2049-A in advance of the Respondent commencing work at the pharmacy.

22                         "Employment" within the meaning of this provision shall include any full-  
23 time, part-time, temporary or relief service or pharmacy management service as a pharmacist,  
24 whether the Respondent is considered an employee or independent contractor.

25           **8. No Preceptorships, Supervision of Interns, Being Pharmacist in**  
26 **Charge.** Respondent shall not supervise any intern pharmacist or perform any of the duties of a  
27 preceptor, nor shall Respondent be the pharmacist -in-charge of any pharmacy licensed by the  
28 Board.

1                   **9. Reimbursement of Board Costs.** Respondent shall reimburse to the  
2 Board its costs of investigation and prosecution in the amount of four thousand dollars  
3 (\$4,000.00.) within sixty (60) days of the effective date of this Order. It is Respondent's  
4 responsibility to mail or otherwise deliver each payment directly to the Board at the Board's  
5 Sacramento address. If Respondent fails to pay the costs as specified in this Order and on the  
6 date(s) determined by the Board, the Board shall, without affording the Respondent notice and the  
7 opportunity to be heard, revoke probation and carry out the disciplinary order that was stayed.

8                   **10. Probation Monitoring Costs.** Respondent shall pay the costs associated  
9 with probation monitoring as determined by the Board each and every year of probation. Such  
10 costs shall be payable to the Board at the end of each year of probation. Failure to pay such costs  
11 shall be considered a violation of probation.

12                   **11. Status of License.** Respondent shall, at all times, while on probation,  
13 maintain an active, current certification/registration with the Board, including any period during  
14 which suspension or probation is tolled.

15                   **12. Notification of Employment/Mailing Address Change.** Within ten (10)  
16 days of a change in employment - - either leaving or commencing employment - - Respondent  
17 shall so notify the Board in writing, including the address of the new employer; within ten (10)  
18 days of a change of mailing address, Respondent shall notify the Board in writing. If Respondent  
19 works for or is employed through a pharmacy employment service, Respondent shall, as  
20 requested, provide to the Board or its designee with a work schedule indicating dates and location  
21 of employment.

22                   **13. Tolling of Probation.** If Respondent leaves California to reside or practice  
23 outside this state, Respondent must notify the Board in writing of the dates of departure and return  
24 within ten (10) days of departure or return. Periods of residency, except such periods where the  
25 Respondent is actively practicing as an exemptee within California, or practice outside California  
26 shall not apply to reduction of the probationary period.

27                   Should Respondent, regardless of residency, for any reason cease practicing as an  
28 exemptee in California, Respondent must notify the Board in writing within ten (10) days of

1 cessation of practice or resuming practice. "Cessation of practice" means any period of time  
2 exceeding thirty (30) days in which Respondent is not engaged in the practice of an exemptee as  
3 defined in section 4053 of the Business and Professions Code.

4           It is a violation of probation for Respondent's probation to remain tolled pursuant  
5 to the provisions of this condition for a period exceeding a consecutive period of three years.

6           **14. Violation of Probation.** If Respondent violates probation in any respect,  
7 the Board, after giving Respondent notice and an opportunity to be heard, may revoke probation  
8 and carry out the disciplinary order which was stayed. If a petition to revoke probation or an  
9 accusation is filed against Respondent during probation, the Board shall have continuing  
10 jurisdiction, and the period of probation shall be extended, until the petition to revoke probation is  
11 heard and decided.

12           If a Respondent has not complied with any term or condition of probation, the  
13 Board shall have continuing jurisdiction over Respondent, and probation shall automatically be  
14 extended until all terms and conditions have been met or the Board has taken other action as  
15 deemed appropriate to treat the failure to comply as a violation of probation, to terminate  
16 probation, and to impose the penalty which was stayed.

17           **15. Completion of Probation.** Upon successful completion of probation,  
18 Respondent's certificate will be fully restored.

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CONTINGENCY

This stipulation shall be subject to the approval of the Board. If the Board fails to adopt this stipulation as its Order, the stipulation shall be of no force or effect for either party, nor shall it be mentioned or referred to in any legal action between the parties.

I concur in this stipulation, which is submitted to the Board of Pharmacy for consideration as its decision in Case No. 2049-A.

DATED: 10-4-01.

  
\_\_\_\_\_  
SUSAN MELTON WILSON  
Deputy Attorney General  
Attorney for Complainant





1 BILL LOCKYER, Attorney General  
of the State of California  
2 WM G. SCHUBERTH,  
Deputy Attorney General, State Bar No. 67450  
3 Department of Justice  
300 South Spring Street  
4 Los Angeles, California 90013-1233  
Telephone: (213) 897-2569

5 Attorneys for Complainant

6  
7 BEFORE THE  
BOARD OF PHARMACY  
8 DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

9 In the Matter of the Accusation Against: ) NO. 2 0 7 4  
10 Kramer's Pharmacy )  
11 29525 Canwood Street ) ACCUSATION  
12 Agoura, CA 91301 )  
13 Original Pharmacy Permit )  
14 No.PHY 22652 )  
15 Herman Leo Kramer )  
16 4056 Whitesale Circle )  
17 Westlake Village, CA 91361 )  
Original Licentiate No. RPH 20744 )  
Respondents. )

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19 Patricia F. Harris, for causes for discipline, alleges:

20 1. Complainant Patricia F. Harris makes and files this Accusation in  
21 her official capacity as Executive Officer, State Board of Pharmacy (hereinafter the  
22 "Board"), Department of Consumer Affairs, State of California .

23 **LICENSE HISTORY**

24 2. On or about April 30, 1970, the Board issued Original Licentiate  
25 Number RPH 20744 to Respondent Herman Leo Kramer (hereinafter "Respondent  
26 Kramer"), to practice pharmacy. The license is in full force and effect and will expire  
27 subject to renewal on August 31, 2001, and the address of record is 4056 Whitesale

1 Circle, Westlake Village, CA 91361.

2 3. On or about October 1, 1982, the Board issued Original Permit  
3 Number PHY 22652 to Kramer's Pharmacy, Inc., to do business as Kramer Pharmacy  
4 (hereinafter "Respondent Pharmacy"). The address of record was 29525 Canwood  
5 Street, Agoura, CA 91301 and the Corporate officers were: Herman Kramer, President;  
6 Barbara Kramer, Vice President; Brenda Kramer, Secretary; and, Herman Leo Kramer,  
7 RPH 20744, was the Pharmacist-in-Charge. The license was in full force and effect  
8 until April 7, 2000, at which time the pharmacy changed ownership to KPI, Inc.,  
9 pharmacy permit PHY 44643, which is in full force and effect until April 1, 2001. The  
10 address of record is 29525 Canwood Street, Agoura, CA 91301 and the Corporate  
11 Officers are: Andrew Kramer, President; Shelly Kramer, Vice President; and, Herman  
12 Leo Kramer, RPH 20744, continues to serve as the Pharmacist-in-Charge.

### 13 JURISDICTION

14 4. Business and Professions Code section 118(b) (hereinafter the  
15 "Code") provides, "[T]he suspension, expiration, or forfeiture by operation of law of a  
16 license issued by a board in the department, or its suspension, forfeiture, or  
17 cancellation by order of the board or by order of a court of law, or its surrender without  
18 the written consent of the board, shall not, during any period in which it may be  
19 renewed, restored, reissued, or reinstated, deprive the board of its authority to institute  
20 or continue a disciplinary proceeding against the licensee upon any ground provided by  
21 law or to enter an order suspending or revoking the license or otherwise taking  
22 disciplinary action against the licensee on any such ground."

23 5. Section 4300 of the Code (formerly section 4350)<sup>1/</sup> permits the  
24 Board to take disciplinary action to suspend or revoke a license issued by the Board.

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26 1. The Pharmacy Act was reenacted and recodified effective January 1,  
27 1997 (C.890, Stats. 1996). All references are to the new Code sections. Section 4 of  
Chapter 890 provides that the recodification of the Pharmacy Law is to be construed as  
a continuation of the previous version of Chapter 9 of the Code.



1 of petit mal, petit mal variant, akinetic, and myoclonic seizures

2 a. Dalmane (brand of flurazepam) is a dangerous drug as defined by  
3 section 4022 of the Code, and is a controlled substance Schedule IV as listed in Health  
4 and Safety Code section 11057(d)(11) and is a hypnotic agent used in the treatment of  
5 insomnia.

6 b. Serax (brand of oxazepam) is a dangerous drug as defined by  
7 section 4022 of the Code, and is a controlled substance Schedule IV as listed in Health  
8 and Safety Code section 11057(d)(17) and is used in the management of anxiety  
9 disorders.

10 c. Lorcet (brand of hydrocodone with acetaminophen) is a dangerous  
11 drug as defined by section 4022 of the Code, and is a controlled substance Schedule IV  
12 as listed in Health and Safety Code section 11057(e)(4) and is a narcotic analgesic  
13 used in the management of moderate to severe pain.

14 **CAUSES FOR DISCIPLINARY ACTION**

15 **FIRST CAUSE OF ACCUSATION**

16 **FILING IRRATIONAL PRESCRIPTIONS**

17 9. Complainant incorporates herein by this reference the Preamble  
18 and each of the allegations set forth in Paragraphs 1 through 9 hereinabove.

19 10. Title 16, Section 1761 of the California Code of Regulations  
20 provides that (a) no pharmacist shall compound or dispense any prescription which  
21 contains any significant error, omission, irregularity, uncertainty, ambiguity or alteration.  
22 Upon receipt of any such prescription, the pharmacist shall contact the prescriber to  
23 obtain the information needed to validate the prescription (b) even after conferring with  
24 the prescriber, a pharmacist shall not compound or dispense a controlled substance  
25 prescription where the pharmacist knows or has objective reason to know that said  
26 prescription was not issued for a legitimate medical purpose.

27 11. Health and Safety Code section 11153 provides (a) a prescription

1 for a controlled substances shall only be issued for a legitimate medical purpose by an  
2 individual practitioner acting in the usual course of his or her professional practice. The  
3 responsibility for the proper prescribing and dispensing of controlled substances is upon  
4 the prescribing practitioner, but a corresponding responsibility rests with the pharmacist  
5 who fills the prescription. Except as authorized by this division, the following are not  
6 legal prescriptions: (1) an order purporting to be a prescription which is issued not in the  
7 usual course of professional treatment or in legitimate and authorized research; or (2)  
8 an order for an addict or habitual user of controlled substances, which is issued not in  
9 the course of professional treatment or as part of an authorized narcotic treatment  
10 program, for the purpose of providing the user with controlled substances, sufficient to  
11 keep him or her comfortable by maintaining customary use.

12 Respondents are subject to discipline by the Board pursuant to Business  
13 and Professions Code sections 4300 and 4301, for unprofessional conduct conduct  
14 within the meaning of Code sections 4301 (b), (c), (d), (i), (j), (o) and (p), by reasons of  
15 violations of California Code of Regulations section 1761 and Health and Safety Code  
16 section 11153, by filling irrational prescriptions not intended for a valid medical purpose  
17 in the following manner:

18 **FACTS**

19 Patient Debbi D. was under the care of a physician who prescribed large  
20 amounts of drugs, as well as giving her free samples. The physician continued to  
21 prescribe the drugs in large amounts even after her release from a rehabilitation  
22 facility. Respondents filled prescriptions written for patient Debbi D. for controlled  
23 substances at intervals which were not consistent with the directions for use or the  
24 recommendations of the manufacturer. Respondent failed to question or bring the  
25 irrational intervals or prescription amounts to the attention of the physician. The patient  
26 died on January 16, 1996, partially because of the drugs in her system.

27 \\\

1 Respondent filled the following prescriptions:

2	<u>RX #</u>	<u>Drug</u>	<u>Date Filled</u>	<u>Qty</u>	<u>Days</u>	<u>Interval</u>
3					<u>Supply</u>	
4	456505	Flurazepam	11/6/95	30	30	**
5	456505	Flurazepam	11/13/95	30	30	7 days
6	456505	Flurazepam	11/20/95	30	30	7 days
7	459035	Flurazepam	12/19/95	30	30	29 days
8	459035	Flurazepam	12/21/95	30	30	3 days
9	459035	Flurazepam	12/26/95	30	30	5 days
10	464159	Flurazepam	1/4/96	30	30	10 days
11	464159	Flurazepam	1/9/96	30	30	5 days
12	464159	Flurazepam	1/10/96	30	30	1 day
13	464157	Serex	1/4/96	30	15	**
14	464157	Serex	1/9/96	30	15	5 days
15	464157	Serex	1/10/96	30	15	1 day
16	464158	Klonopin	1/4/96	60	30	**
17	464158	Klonopin	1/9/96	60	30	5 days
18	464158	Klonopin	1/10/96	60	30	1 day

19 **WHEREFORE**, Complainant prays that a hearing be held and that  
20 following said hearing that the Board of Pharmacy make its order:

- 21 1. Revoking or suspending Original Licentiate Number RPH issued to  
22 Respondent Herman Leo Kramer;
- 23 2. Revoking or suspending Original Licentiate Number PHY 27652  
24 issued to Kramer's Pharmacy;
- 25 3. Issue an order compelling the Respondents to reimburse the Board  
26 for the reasonable costs and its investigation, enforcement and prosecution of this  
27 matter, up to the day of hearing; and

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4. Taking such other and further action as the Board deems proper.

DATED: 6/7/00

P. F. Harris

PATRICIA F. HARRIS  
Executive Officer  
Board of Pharmacy  
Department of Consumer Affairs  
State of California

Complainant

pharmacy.brd/kramer acc  
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