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7

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

11 In the Matter of the Accusation Against:

Case No. 4775

12  
13 **RITE AID PHARMACY #5429**  
14 **ANNE CHUNG, Pharmacist in Charge**  
500 S. Broadway  
15 Los Angeles, CA 90013  
Pharmacy Permit No. PHY 42331  
16

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

17 **ANNE CHON-YIN CHUNG,**  
3782 Moore Street  
18 Los Angeles, CA 90066  
Original Pharmacist License No. RPH 40932  
19

20 Respondents.  
21

22 Complainant alleges:

23 **PARTIES**

- 24 1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity  
25 as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.  
26 2. On or about February 21, 1997, the Board of Pharmacy issued Pharmacy Permit  
27 Number PHY 42331 to Rite Aid #5429, located at 500 S. Broadway, Los Angeles, California  
28 90013-2302 (Respondent Rite Aid Pharmacy). The Pharmacy Permit was in full force and effect

1 at all times relevant to the charges brought herein and will expire on April 1, 2014, unless  
2 renewed.

3 3. On or about May 13, 1987, the Board of Pharmacy issued Original Pharmacist  
4 License No. RPH 40932 to Anne Chon-Yin Chung aka Anne Chung (Respondent Chung). The  
5 Original Pharmacy License was in full force and effect at all times relevant to the charges brought  
6 herein and will expire on January 31, 2015, unless renewed.

7 4. On or about April 9, 2000, Respondent Chung became the Pharmacist in Charge for  
8 Respondent Rite Aid Pharmacy.

### 9 JURISDICTION

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

13 6. Section 4300 of the Code states:

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

15 . . . .

16 7. Section 4301 of the Code states:

17 "The board shall take action against any holder of a license who is guilty of unprofessional  
18 conduct or whose license has been procured by fraud or misrepresentation or issued by mistake.  
19 Unprofessional conduct shall include, but is not limited to, any of the following:

20 "(a) Gross immorality.

21 "(b) Incompetence.

22 "(c) Gross negligence.

23 "(d) The clearly excessive furnishing of controlled substances in violation of subdivision (a)  
24 of Section 11153 of the Health and Safety Code.

25 "(e) The clearly excessive furnishing of controlled substances in violation of subdivision (a)  
26 of Section 11153.5 of the Health and Safety Code. Factors to be considered in determining  
27 whether the furnishing of controlled substances is clearly excessive shall include, but not be  
28 limited to, the amount of controlled substances furnished, the previous ordering pattern of the

1 customer (including size and frequency of orders), the type and size of the customer, and where  
2 and to whom the customer distributes its product.

3 "(f) The commission of any act involving moral turpitude, dishonesty, fraud, deceit, or  
4 corruption, whether the act is committed in the course of relations as a licensee or otherwise, and  
5 whether the act is a felony or misdemeanor or not.

6 "(g) Knowingly making or signing any certificate or other document that falsely represents  
7 the existence or nonexistence of a state of facts.

8 "(h) The administering to oneself, of any controlled substance, or the use of any dangerous  
9 drug or of alcoholic beverages to the extent or in a manner as to be dangerous or injurious to  
10 oneself, to a person holding a license under this chapter, or to any other person or to the public, or  
11 to the extent that the use impairs the ability of the person to conduct with safety to the public the  
12 practice authorized by the license.

13 "(i) Except as otherwise authorized by law, knowingly selling, furnishing, giving away, or  
14 administering or offering to sell, furnish, give away, or administer any controlled substance to an  
15 addict.

16 "(j) The violation of any of the statutes of this state, or any other state, or of the United  
17 States regulating controlled substances and dangerous drugs.

18 . . . .

19 "(o) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the  
20 violation of or conspiring to violate any provision or term of this chapter or of the applicable  
21 federal and state laws and regulations governing pharmacy, including regulations established by  
22 the board or by any other state or federal regulatory agency.

23 "(p) Actions or conduct that would have warranted denial of a license.

24 "(q) Engaging in any conduct that subverts or attempts to subvert an investigation of the  
25 board.

26 "(r) The selling, trading, transferring, or furnishing of drugs obtained pursuant to Section  
27 256b of Title 42 of the United States Code to any person a licensee knows or reasonably should  
28

1 have known, not to be a patient of a covered entity, as defined in paragraph (4) of subsection (a)  
2 of Section 256b of Title 42 of the United States Code.

3 "(s) The clearly excessive furnishing of dangerous drugs by a wholesaler to a pharmacy that  
4 primarily or solely dispenses prescription drugs to patients of long-term care facilities. Factors to  
5 be considered in determining whether the furnishing of dangerous drugs is clearly excessive shall  
6 include, but not be limited to, the amount of dangerous drugs furnished to a pharmacy that  
7 primarily or solely dispenses prescription drugs to patients of long-term care facilities, the  
8 previous ordering pattern of the pharmacy, and the general patient population to whom the  
9 pharmacy distributes the dangerous drugs. That a wholesaler has established, and employs, a  
10 tracking system that complies with the requirements of subdivision (b) of Section 4164 shall be  
11 considered in determining whether there has been a violation of this subdivision. This provision  
12 shall not be interpreted to require a wholesaler to obtain personal medical information or be  
13 authorized to permit a wholesaler to have access to personal medical information except as  
14 otherwise authorized by Section 56 and following of the Civil Code. "

15 8. Section 4059 of the Code states, in pertinent part, that a person may not furnish any  
16 dangerous drug except upon the prescription of a physician, dentist, podiatrist, optometrist,  
17 veterinarian, or naturopathic doctor pursuant to Section 3640.7. A person may not furnish any  
18 dangerous device, except upon the prescription of a physician, dentist, podiatrist, optometrist,  
19 veterinarian, or naturopathic doctor pursuant to Section 3640.7.

20 9. Section 4081 of the Code states:

21 "(a) All records of manufacture and of sale, acquisition, or disposition of dangerous drugs  
22 or dangerous devices shall be at all times during business hours open to inspection by authorized  
23 officers of the law, and shall be preserved for at least three years from the date of making. A  
24 current inventory shall be kept by every manufacturer, wholesaler, pharmacy, veterinary  
25 food-animal drug retailer, physician, dentist, podiatrist, veterinarian, laboratory, clinic, hospital,  
26 institution, or establishment holding a currently valid and unrevoked certificate, license, permit,  
27 registration, or exemption under Division 2 (commencing with Section 1200) of the Health and  
28

1 Safety Code or under Part 4 (commencing with Section 16000) of Division 9 of the Welfare and  
2 Institutions Code who maintains a stock of dangerous drugs or dangerous devices.

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

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

10 10. Section 4324 of the Code states:

11 "(a) Every person who signs the name of another, or of a fictitious person, or falsely makes,  
12 alters, forges, utters, publishes, passes, or attempts to pass, as genuine, any prescription for any  
13 drugs is guilty of forgery and upon conviction thereof shall be punished by imprisonment in the  
14 state prison, or by imprisonment in the county jail for not more than one year.

15 "(b) Every person who has in his or her possession any drugs secured by a forged  
16 prescription shall be punished by imprisonment in the state prison, or by imprisonment in the  
17 county jail for not more than one year."

18 11. Health and Safety Code section 11200 states in pertinent part:

19 . . . .

20 "(b) No prescription for a Schedule III or IV substance may be refilled more than five times  
21 and in an amount, for all refills of that prescription taken together, exceeding a 120-day supply."

22 . . . . .

23 12. Health and Safety Code section 11153 subdivision (a) states:

24 A prescription for a controlled substance shall only be issued for a legitimate medical  
25 purpose by an individual practitioner acting in the usual course of his or her professional practice.  
26 The responsibility for the proper prescribing and dispensing of controlled substances is upon the  
27 prescribing practitioner, but a corresponding responsibility rests with the pharmacist who fills the  
28

1 prescription. Except as authorized by this division, the following are not legal prescriptions: (1)  
2 an order purporting to be a prescription which is issued not in the usual course of professional  
3 treatment or in legitimate and authorized research; or (2) an order for an addict or habitual user of  
4 controlled substances, which is issued not in the course of professional treatment or as part of an  
5 authorized narcotic treatment program, for the purpose of providing the user with controlled  
6 substances, sufficient to keep him or her comfortable by maintaining customary use.

7 13. California Code of Regulations, title 16, section 1717 subdivision (e), states:

8 "A pharmacist may transfer a prescription for Schedule III, IV or V controlled substances to  
9 another pharmacy for refill purposes in accordance with Title 21, Code of Federal Regulations,  
10 section 1306.25.

11 "Prescriptions for other dangerous drugs which are not controlled substances may also be  
12 transferred by direct communication between pharmacists or by the receiving pharmacist's access  
13 to prescriptions or electronic files that have been created or verified by a pharmacist at the  
14 transferring pharmacy. The receiving pharmacist shall create a written prescription; identifying it  
15 as a transferred prescription; and record the date of transfer and the original prescription number.

16 When a prescription transfer is accomplished via direct access by the receiving pharmacist, the  
17 receiving pharmacist shall notify the transferring pharmacy of the transfer. A pharmacist at the  
18 transferring pharmacy shall then assure that there is a record of the prescription as having been  
19 transferred, and the date of transfer. Each pharmacy shall maintain inventory accountability and  
20 pharmacist accountability and dispense in accordance with the provisions of section 1716 of this  
21 Division. Information maintained by each pharmacy shall at least include:

22 "(1) Identification of pharmacist(s) transferring information;

23 "(2) Name and identification code or address of the pharmacy from which the prescription  
24 was received or to which the prescription was transferred, as appropriate;

25 "(3) Original date and last dispensing date;

26 "(4) Number of refills and date originally authorized;

27 "(5) Number of refills remaining but not dispensed;

28

1       “(6) Number of refills transferred.”

2       . . . .

3       14. California Code of Regulations, title 16, section 1718, states:

4       “Current Inventory’ as used in Sections 4081 and 4332 of the Business and Professions  
5 Code shall be considered to include complete accountability for all dangerous drugs handled by  
6 every licensee enumerated in Sections 4081 and 4332.

7       “The controlled substances inventories required by Title 21, CFR, Section 1304 shall be  
8 available for inspection upon request for at least 3 years after the date of the inventory.”

9       15. California Code of Regulations, title 16, section 1761, subdivision (a), states:

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

14       16. Section 4105 of the Code states:

15       “(a) All records or other documentation of the acquisition and disposition of dangerous  
16 drugs and dangerous devices by any entity licensed by the board shall be retained on the licensed  
17 premises in a readily retrievable form.

18       “(b) The licensee may remove the original records or documentation from the licensed  
19 premises on a temporary basis for license-related purposes. However, a duplicate set of those  
20 records or other documentation shall be retained on the licensed premises.

21       “(c) The records required by this section shall be retained on the licensed premises for a  
22 period of three years from the date of making.

23       “(d) Any records that are maintained electronically shall be maintained so that the  
24 pharmacist-in-charge, the pharmacist on duty if the pharmacist-in-charge is not on duty, or, in the  
25 case of a veterinary food-animal drug retailer or wholesaler, the designated representative on  
26 duty, shall, at all times during which the licensed premises are open for business, be able to  
27 produce a hard copy and electronic copy of all records of acquisition or disposition or other drug  
28 or dispensing-related records maintained electronically.





1           21. **Vicodin/Vicodin-ES**, is brand name for Hydrocodone with Acetaminophen. It is a  
2 schedule III controlled substance as designated by Health and Safety Code section 11056,  
3 subdivision (e)(4) and is categorized as a “dangerous drug,” pursuant to Business and Professions  
4 Code section 4022.

5           22. **Phenergan with Codine** is a trade name for promethazine HCl. It is a Schedule V  
6 controlled substance as designated by Health and Safety Code section 11058(c)(1) and is  
7 categorized as a “dangerous drug,” pursuant to Business and Professions Code section 4022. It is  
8 primarily used for cough.

9           23. **Valium**, is brand name for Diazepam. It is a Schedule IV controlled substance as  
10 designated by Health and Safety Code section 11057, subdivision (d)(9) and is categorized as a  
11 “dangerous drug,” pursuant to Business and Professions Code section 4022.

12           24. **Xanax**, is brand name for Alprazolam. It is a Schedule IV controlled substance as  
13 designated by Health and Safety Code section 11057, subdivision (d)(1) and is categorized as a  
14 “dangerous drug,” pursuant to Business and Professions Code section 4022.

15           25. **Soma** is a brand name for Carisprodol. It is categorized as a “dangerous drug,”  
16 pursuant to Business and Professions Code section 4022. Its primary indication for use is as a  
17 muscle relaxant.

18           26. **Halcion** is a brand name for Triazolam. It is a Schedule IV controlled substance as  
19 designated by Health and Safety Code section 11057, subdivision (d)(30) and is categorized as a  
20 “dangerous drug,” pursuant to Business and Professions Code section 4022. Its primary indication  
21 for use is for anxiety.

22           27. **Ambien** is a brand name for Zolpidem. It is a Schedule IV controlled substance as  
23 designated by Health and Safety Code section 11057, subdivision (d)(32) and is categorized as a  
24 “dangerous drug,” pursuant to Business and Professions Code section 4022. Its primary indication  
25 for use is for insomnia.

26           28. **Suboxone** is a brand name for Buprenorphine. It is a Schedule III controlled  
27 substance as designated by Title 21 Code of Federal Regulations section 1308.13(e)(2)(i), and is  
28

1 categorized as a "dangerous drug," pursuant to Business and Professions Code section 4022. Its  
2 primary indication for use is opioid dependence.

3 29. **Ativan**, is brand name for Lorazepam. It is a Schedule IV controlled substance as  
4 designated by Health and Safety Code section 11057, subdivision (d)(16) and is categorized as a  
5 "dangerous drug," pursuant to Business and Professions Code section 4022. Its primary indication  
6 for use is anxiety.

7 30. **Klonopin** is brand name for Clonazepam. It is a Schedule IV controlled substance as  
8 designated by Health and Safety Code section 11057, subdivision (d)(7) and is categorized as a  
9 "dangerous drug," pursuant to Business and Professions Code section 4022. Its primary indication  
10 for use is anxiety and anticonvulsant.

11 **FIRST CAUSE FOR DISCIPLINE**

12 **(Filling of Erroneous or Uncertain Prescriptions and**

13 **Failure to Assume Co-Responsibility in Legitimacy of a Prescription)**

14 **(Respondents Rite Aid Pharmacy and Chung)**

15 31. Respondent Rite Aid Pharmacy and Respondent Chung, Pharmacist-in-Charge of  
16 Respondent Rite Aid, are subject to under sections 4300 and 4301, subdivision (d) and (o) of the  
17 Business and Professions Code, for unprofessional conduct, for violating Health and Safety Code  
18 section 11153, subdivision (a) and California Code of Regulations, title 16, section 1761,  
19 subdivision (a), in that Respondents filled and dispensed prescriptions, which were uncertain and  
20 ambiguous. It failed to question whether these prescriptions served legitimate purposes and  
21 further failed to use its professional judgment to refuse to fill or refill prescriptions presented by  
22 patients who presented as habitual doctor shoppers with erroneous/uncertain prescriptions for the  
23 following:

24 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer J.A.**

25 32. Between June 3, 2010 and May 16, 2011, consumer J.A. went to 4 different doctors to  
26 obtain prescriptions. He presented the prescriptions to Rite Aid Pharmacy #5429 which were  
27 filled for Apap and hydrocodone/apap as follows:

1 a. On 6/3/2010, consumer J.A. had Rx # 54668 filled for 45 Apap #3, 22 day supply by  
2 Dr. Amos.

3 b. On 6/19/2010, consumer J.A. had Rx # 549366 filled for 45 Apap #3 , 22 days  
4 supply, 6 days early.

5 c. On 1/31/2011, consumer J.A. had Rx # 594508 filled for 150 hydrocodone/apap  
6 10/325, 25 days supply.

7 d. On 2/19/2011, consumer J.A. had Rx # 598515 filled for 150 hydrocodone/apap  
8 10/325, 25 day supply, 6 days early.

9 e. On 3/10/2011, consumer J.A. had Rx # 603673 filled for 90 hydrocodone /apap  
10 10/325, 15 day supply, 6 days early.

11 f. On 4/27/2011, consumer J.A. had Rx # 613670 filled for 150 hydrocodone/apap  
12 10/325, 25 day supply, Dr. Lahka.

13 g. On 5/16/2011, consumer J.A. had Rx # 611731 re-filled for 90 hydrocodone/apap  
14 10/325, 15 day supply 6 days early. Rx 611731 was originally filled on 4/15/2011

15 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer R.B.**

16 33. Between November 11, 2011 and December 12, 2011, consumer R.B. presented  
17 prescriptions to Rite Aid Pharmacy #5429 which were filled for hydrocodone/apap as follows:

18 a. On 11/11/2011, consumer R.B. had Rx # 659685 filled for 90 hydrocodone /apap  
19 10/325, 22 days supply by Dr. Lakha.

20 b. On 11/28/2011, consumer R.B. had Rx # 64095 filled for 90 hydrocodone/apap  
21 10/325, 22 days supply 5 days early.

22 c. On 12/2/2011, consumer R.B. had Rx # 666460 filled for 90 hydrocodone/apap  
23 10/325, 22 day supply 18 days early.

24 d. On 12/12/2011, consumer R.B. had Rx # 669354 filled for 90 hydrocodone/apap  
25 10/325, 12 days early.

26 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer T.B.**

27 34. Between August 25, 2009 and October 28, 2010, consumer T.B. presented  
28 prescriptions to Rite Aid Pharmacy #5429 for hydrocodone/apap which were filled as follows:

1 a. On 8/25/2009, consumer T.B. had Rx # 479013 filled for 60 hydrocodone/apap  
2 7.5/750, 12 day supply by Dr. Pacheco.

3 b. On 9/1/2009, consumer T.B. had Rx # 479013 refilled for 60 hydrocodone/apap  
4 7/5/750, 12 day supply, 5 days early.

5 c. On 11/30/2009, consumer T.B. had Rx # 511071 filled for 60 hydrocodone/apap  
6 7.5/750, 30 day supply.

7 d. On 12/21/2009, consumer T.B. had Rx # 515055 filled for 60 hydrocodone/apap  
8 7.5/750, 30 day supply, 8 days early.

9 e. On 6/24/2010, consumer T.B. had Rx # 547591 filled for 60 hydrocodone/apap 7.5,  
10 30 days supply by Dr. Castro

11 f. On 7/8/2010, consumer T.B. had Rx # 547591 refilled for 60 hydrocodone/apap 7.5,  
12 16 days early.

13 g. On 9/24/2010, consumer T.B. had Rx # 567365 filled for 60 hydrocodone/apap, 30  
14 day supply by Dr. Pacheco. On 10/16/2010, Rx 567365 filled for 60 hydrocodone/apap 7.5, 30  
15 day supply, 8 days early

16 h. On 10/28/2010, consumer T.B. had Rx 576154, filled for 60 hydrocodone/apap 7.5,  
17 30 days supply 18 days early

18 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer R.B. (2)**

19 35. Between February 22, 2011 and January 23, 2012, consumer R.B. (2) presented  
20 prescriptions to Rite Aid Pharmacy #5429 for diazepam and hydrocodone/apap, which were filled  
21 as follows:

22 a. On 2/22/2011, consumer R.B. (2) had Rx # 587403 filled for 30 diazepam 10 mg, 30  
23 day supply by Dr. Oganyan.

24 b. On 3/3/2011, consumer R.B. (2) had Rx # 602173 filled for 30 diazepam 10 mg, 30  
25 day supply, 21 days early.

26 c. On 3/21/2011, consumer R.B. (2) had Rx # 606241 filled for 30 diazepam 10 mg, 30  
27 day supply, 11 days early.

28

- 1           d.    On 4/6/2011, consumer R.B. (2) had Rx # 606241 filled for 30 diazepam long, 30 day  
2 supply, 14 days early.
- 3           e.    On 4/23/2011, consumer R.B. (2) had Rx 60273 filled for 30 diazepam 10 mg, 30  
4 days supply, 13 days early.
- 5           f.    On 5/18/2011, consumer R.B. (2) had Rx 618613 filled for 30 diazepam 10 mg, 30  
6 day supply.
- 7           g.    On 6/5/2011, consumer R.B. (2) had Rx 618613 filled for 30 diazepam 10 mg, 30 day  
8 supply, 12 days early.
- 9           h.    On 6/28/2011, consumer R.B. (2) had Rx 618613 filled for 30 diazepam 10 mg, 30  
10 days supply, 7 days early.
- 11          i.    On 7/13/2011, consumer R.B. (2) had Rx # 630459 filled for 30 diazepam 10 mg, 30  
12 day supply, 14 days early.
- 13          j.    On 10/12/2011, consumer R.B. (2) had Rx # 652621 filled for 30 diazepam 10 mg, 30  
14 days supply.
- 15          k.    On 11/11/2011, consumer R.B. (2) had Rx # 652621 filled for 30 diazepam 10 mg, 30  
16 day supply, 10 days early.
- 17          l.    On 11/21/2011, consumer R.B. (2) had Rx # 652621 filled for 30 diazepam 10 mg, 10  
18 days early.
- 19          m.    On 12/8/2011, consumer R.B. (2) had Rx # 668302 filled for 30 diazepam 10 mg, 30  
20 day supply.
- 21          n.    On 12/28/2011, consumer R.B. (2) had Rx # 668302 filled for 30 diazepam 10 mg 30  
22 day supply, 10 days early.
- 23          o.    On 1/4/2012, consumer R.B. (2) had Rx # 673968 filled for 30 diazepam 10 mg, 13  
24 days early.
- 25          p.    On 11/21/2011, consumer R.B. (2) had Rx # 663543 filled for 90 hydrocodone/apap  
26 7.5/750, 30 day supply.
- 27          q.    On 12/8/2011, consumer R.B. (2) had Rx # 663543 filled for 90 hydrocodone/apap  
28 7.5/750 13 days early and filled again on 1/5/2012, 30 day supply.

1 r. On 11/23/2012, consumer R.B. (2) had Rx # 679710 filled for 90 hydrocodone/apap  
2 7.5, 12 days early.

3 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer P.B.**

4 36. Between October 21, 2011 and October 22, 2011, consumer P.B. presented  
5 prescriptions to Rite Aid Pharmacy #5429 for hydrocodone/apap, which were filled as follows:

6 a. On 10/21/2011, consumer P.B. had Rx # 654986 filled for 90 hydrocodone/apap  
7 7.5/750, 30 days supply by Dr. Casillas.

8 b. On 10/22/2011, consumer P.B. had Rx # 655286 filled for 60 hydrocodone/apap  
9 7.5, 20 day supply by Dr. Uche 28 days early.

10 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer L.B.**

11 37. Between March 30, 2011 and April 14, 2011, consumer L.B. presented  
12 prescriptions to Rite Aid Pharmacy #5429 for hydrocodone/apap, which were filled as follows:

13 a. On 3/30/2011, consumer L.B. had Rx # 608196 filled for 45 hydrocodone/apap  
14 10/325, 22 day supply by Dr. Amos.

15 b. On 4/14/2011, consumer L.B. had Rx # 611482 filled for 45 hydrocodone/apap  
16 10/325 by Dr. Hineman, 7 days early.

17 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer R.B.(3)**

18 38. Between March 30, 2011 and April 14, 2011, consumer R.B. (3) presented  
19 prescriptions to Rite Aid Pharmacy #5429 for hydrocodone/apap, which were filled as follows:

20 a. On 1/26/2011, consumer R.B.(3) had Rx # 594505 filled for 90 hydrocodone/apap  
21 10/325, 22 day supply by Dr. R. Lakha.

22 b. On 2/10/2011, consumer R.B.(3) had Rx # 596506 filled for 90 hydrocodone/apap  
23 10/325, 22 day supply, 7 days early.

24 c. On 3/4/2011, consumer R.B.(3) had Rx # 602521 filled for 90 hydrocodone/apap, 22  
25 day supply, 10 days early.

26 d. On 6/3/2011, consumer R.B.(3) had Rx # 621917 filled for 90 hydrocodone/apap, 22  
27 day supply, 7 days early.

28

1 e. On 8/19/2011, consumer R.B.(3) had Rx 639079 filled for 90 hydrocodone /apap  
2 10/325, 22 days supply 6 days early.

3 f. On 9/3/2011, consumer R.B.(3) had Rx 641513 filled for 90 hydrocodone/apap  
4 10/325, 22 day supply, 7 days early.

5 g. On 9/19/2011, consumer R.B.(3) had Rx # 646525 filled for 90 hydrocodone/apap  
6 10/325,22 days supply. 6 days early.

7 h. On 10/4/2001, consumer R.B.(3) had Rx # 648240 filled for 90 hydrocodone/apap  
8 10/325, 22 day supply, 7 days early.

9 i. On 10/19/2011, consumer R.B.(3) had Rx # 653716 filled for 90 hydrocodone/apap,  
10 22 day supply, 7 days early.

11 j. On 11/3/2011, consumer R.B.(3) had Rx # 658465 filled for 90  
12 hydrocodone/apap/10/325, 22 day supply, 7 days early.

13 k. On 11/17/2011, consumer R.B.(3) had had Rx # 661225 filled for 90 hydrocodone  
14 /apap 10/325, 22 day supply, 8 days early.

15 l. On 11/23/2011, consumer R.B.(3) had Rx # 664096 filled for 90 hydrocodone/apap  
16 10/325, 22 day supply 16 days early.

17 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer S.B.**

18 39. Between April 14, 2009 and October 21, 2011, consumer S.B., who went to 16  
19 doctors and 5 pharmacies within this time period, presented prescriptions to Rite Aid Pharmacy  
20 #5429 for hydrocodone/apap, which were filled as follows:

21 a. On 10/21/2011, consumer S.B. had Rx # 655458 filled for 30 alprazolam 1 mg, 15  
22 day supply by Dr. S. Ho.

23 b. On 10/26/2011, consumer S.B. had Rx # 655458 refilled for 30 alprazolam 1 mg, 10  
24 days early.

25 c. On 4/16/2009, consumer S.B. had Rx 466989 refilled for 60 alprazolam 2 mg, 30 day  
26 supply, by Dr. C. Christian, 16 days early.

27 d. On 5/6/2009, consumer S.B. had Rx # 473496 filled for 60 alprazolam 2 mg, 30 day  
28 supply by Dr. Christian, 9 days early.

- 1 e. On 6/5/2009, consumer S.B. had Rx # 478051 refilled for 60 alprazolam 2 mg, 30  
2 days supply by Dr. F. Rundall, 26 days early.
- 3 f. On 6/12/2009, consumer S.B. had Rx # 478051 refilled for 60 alprazolam 2 mg, 30  
4 days supply, 23 days early.
- 5 g. On 6/19/2009, consumer S.B. Rx # 481847 filled for 60 alprazolam 2 mg, 30 days  
6 supply by Dr. Rundall, 23 days early.
- 7 h. On 8/11/2009, consumer S.B. had Rx # 490374 refilled for 30 alprazolam 2 mg, 15  
8 day supply by Dr. Christian, 10 days early.
- 9 i. On 9/15/2011, consumer S.B. had Rx # 496572 refilled for 30 alprazolam 2 mg, 15  
10 day supply by Dr. Charistian 10 days early and again on 9/25/2009.
- 11 j. On 10/1/2009, consumer S.B. had Rx # 496572 refilled for 30 alprazolam 2 mg, 15  
12 day supply, 8 days early.
- 13 k. On 10/10/2009, consumer S.B. had Rx # 501604, filled for 30 alprazolam 2 mg, 15  
14 day supply by Dr. Rundall, 6 days early •
- 15 l. On 10/16/2009, consumer S.B. had Rx # 501604 refilled for 30 alprazolam 2 mg, 15  
16 day supply, 9 days early.
- 17 m. On 11/6/2009, consumer S.B. had Rx 507087 filled for 60 alprazolam 2 mg, 30 day  
18 supply by Dr. Christian.
- 19 n. On 11/17/2009, consumer S.B. had Rx # 508939 filled for 30 alprazolam 2 mg, 15  
20 day supply (DS) by Dr. D. Amos, 19 days early.
- 21 o. On 11/21/2009, consumer S.B. had Rx 508939 filled for 30 alprazolam 2 mg, 10 days  
22 early.
- 23 p. On 12/1/2009, consumer S.B. had Rx 511332 filled for 30 alprazolam 2 mg, 15 DS  
24 by Dr. D. Amos.
- 25 q. On 12/5/2009, consumer S.B. had Rx 511332 filled for 30 alprazolam 2 mg, 9 days  
26 early.
- 27 r. On 12/17/2009, consumer S.B. had Rx 514401 filled for 30 alprazolam 2 mg, 15 DS  
28 by Dr. C. Christian.



1 s. On 12/21/2009, consumer S.B. had Rx # 514401 filled for 30 alprazolam 2 mg, 11  
2 days early.

3 t. On 2/16/2010, consumer S.B. had Rx # 525423 filled for 30 alprazolam 2 mg, 15 DS  
4 by Dr. D. Amos.

5 u. On 2/18/2010, consumer S.B. had Rx # 525423 filled for 30 alprazolam 2 mg, 13  
6 days early.

7 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer R.C.**

8 40. Between March 5, 2010 and December 3, 2010, consumer R.C., who went to 6  
9 doctors for prescriptions, presented prescriptions to Rite Aid Pharmacy #5429 for triazolam,  
10 which were filled as follows:

11 a. On 3/5/2010, consumer R.C. had Rx # 524863 filled for 30 triazolam 0.25 mg, 30 DS  
12 by Dr. K. Wong.

13 b. On 3/27/2010, consumer R.C. had Rx # 524863 filled for 30 triazolam 0.25, 30 DS, 8  
14 days early

15 c. On 4/19/2010, consumer R.C. had Rx # 524863 filled for 30 Triazolam 0.25, 30 DS,  
16 8 days early.

17 d. On 5/11/2010, consumer R.C. had Rx # 524863 filled for 30 triazolam 0.25, 30 DS.

18 e. On 6/2/2010, consumer R.C. had Rx # 544315 filled for 30 triazolam 0.25, 30 DS by  
19 Dr. V. Bustamente, 8 days early.

20 f. On 6/30/2010 and 7/26/2010, consumer R.C. had Rx # 544315 refilled for 30  
21 triazolam 0.25, 30 DS.

22 g. On 8/17/2010, consumer R.C. had Rx # 544315 refilled for 30 triazolam 0.25, 30 DS,  
23 8 days early.

24 h. On 10/22/2010, consumer R.C. had Rx # 574199 filled for 30 triazolam 0.25, 30 DS.

25 i. On 11/8/2010, consumer R.C. had Rx # 574199 refilled for 30 triazolam 0.25, 30 DS,  
26 15 days early.

27 j. On 11/27/2010, consumer R.C. had Rx # 576371 filled for 30 triazolam 0.25, 30 DS  
28 by Dr. V. Bustamente.

1 k. On 12/1/2010, consumer R.C. had Rx # 582717 filled for 30 triazolam 0.25, 30 DS by  
2 Dr. A. Chai, 26 days early.

3 l. On 12/3/2010, consumer R.C. had Rx # 583219, filled for 31 triazolam 0.25, 31 DS  
4 by Dr. A. Chai, 29 days early.

5 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer H.C.**

6 41. Between August 16, 2010 and January 7, 2012, consumer H.C. presented  
7 prescriptions to Rite Aid Pharmacy #5429. During this time period, he went to 13 doctors and 9  
8 pharmacies for controlled substances.

9 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer J.D.**

10 42. Between March 2, 2009 and April 15, 2011, consumer J.D. who went to 12  
11 doctors for prescriptions, and 4 pharmacies, presented prescriptions to Rite Aid Pharmacy #5429  
12 for hydrocodone/apap, which were filled as follows:

13 a. On 3/7/2009, consumer J.D. had Rx # 462123 filled for 60 hydrocodone/apap 5/500,  
14 30 DS by J. Mays, 10 days early.

15 b. On 5/27/2009, consumer J.D. had Rx # 477314 filled for 30 hydrocodone/apap 5/500,  
16 15 DS by Dr. Mays.

17 c. On 6/1/2009, consumer J.D. had Rx # 477314 refilled for 30 hydrocodone/apap  
18 5/500, 15 DS, 10 days early.

19 d. On 6/8/2009, consumer J.D. had Rx # 479380 filled for 30 hydrocodone/apap 5/500,  
20 10 DS by Dr. Adetola, 8 days early.

21 e. On 12/15/2009, consumer J.D. had Rx # 514165 filled for 35 hydrocodone/apap  
22 ,5/500, 35 DS by J Mays.

23 f. On 12/30/2009, consumer J.D. had Rx 516589 filled for 30 hydrocodone/apap 5/500,  
24 5 DS by Dr. N Dzebolic, 20 days early.

25 g. On 4/12/2011, consumer J.D. had Rx # 611185 filled for 15 hydrocodone/apap 5/500,  
26 15 DS by J. Mays.

27 h. On 4/15/2011, consumer J.D. had Rx # 611185 refilled for 15 hydrocodone/apap  
28 5/500 12 days early.

1 ///

2 ///

3 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer J.F.**

4 43. Between December 20, 2010 and November 15, 2011 consumer J.F. presented  
5 prescriptions to Rite Aid Pharmacy #5429 for hydrocodone/apap, which were filled as follows:

6 a. On 12/20/2010, consumer J.F. had Rx # 586842 filled for 30 Alprazolam 2 mg, 13  
7 days early

8 b. On 1/24/2011, consumer J.F. had Rx # 593887 filled for 60 hydrocodone/apap  
9 10/325, 10 DS by Dr. Lakha.

10 c. On 1/25/2011, consumer J.F. had Rx # 593887 filled for 60 hydrocodone/apap  
11 10/325, 9 days early.

12 d. On 3/13/2011, consumer J.F. had Rx # 603674 filled for 120 hydrocodone/apap  
13 10/325 20 DS by Dr. Lakha.

14 e. On 3/17/2011, consumer J.F. had Rx # 605518 filled for 120 hydrocodone/10/325, 20  
15 DS, 16 days early.

16 f. On 3/31/2011, consumer J.F. had Rx # 608397 filled for 120 hydrocodone/apap  
17 10/325, 22 days early.

18 g. On 7/8/2011, consumer J.F. had Rx # 629245 filled for 120 hydrocodone/apap  
19 10/325, 20 DS.

20 h. On 7/14/2011, consumer J.F. had Rx # 630608 filled for 120 hydrocodone/apap  
21 10/325, 20 DS.

22 i. On 7/24/2011, consumer J.F. had Rx # 632619 filled for 120 hydrocodone/apap  
23 10/325, 10 days early.

24 j. On 9/27/2011, consumer J.F. had Rx # 646910 filled for 120 hydrocodone/apap  
25 10/325, 20 DS.

26 k. On 9/29/2011, consumer J.F. had Rx # 649041 filled for 120 hydrocodone/apap  
27 10/325, 18 days early.

28

1           l. On 11/3/2011, consumer J.F. had Rx # 657908 filled for 120 hydrocodone/apap  
2 10/325, 20 DS.

3           m. On 11/15/2011, consumer J.F. had Rx # 660117 filled for 120 hydrocodone/apap  
4 10/325, 20 DS, 8 days early.

5 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer S.F.**

6           44. Consumer S.F., who went to 19 doctors for prescriptions, and 4 pharmacies,  
7 presented prescriptions to Rite Aid Pharmacy #5429 for hydrocodone/apap, which were filled as  
8 follows:

9           a. On 1/15/2010, consumer S.F. had Rx # 519943 filled for 120 hydrocodone/apap  
10 10/325, 30 DS by Dr. D. Ricklis.

11           b. On 1/28/2010, consumer S.F. had Rx # 521962 filled for 120 hydrocodone/apap  
12 10/325, 15 DS by Dr. B. Chaudry, 17 days early.

13           c. On 6/16/2010, consumer S.F. had Rx # 549416 filled for 120 hydrocodone/apap  
14 10/325,30 DS by Dr. B. Collins.

15           d. On 7/5/2010, consumer S.F. had Rx # 552283 filled for 60 hydrocodone/apap 10/325,  
16 15 DS by Dr. B. Chaudry, 10 days early. On 7/5/2010.

17           e. On 7/14/2010, consumer S.F. had Rx # 555066 filled for 120 hydrocodone/apap  
18 10/325, 15 DS by Dr. W. Mao, 16 days early.

19           f. On 12/10/2010, consumer S.F. had Rx # 585027 filled for 120 hydrocodone/apap  
20 10/325, 20 DS by Dr. L Hashemi.

21           g. On 12/23/2010, consumer S.F. had Rx # 585027 refilled for 120 hydrocodone/apap  
22 10/325, 7 days early

23           h. On 2/3/2011, consumer S.F. had Rx # 596345 filled for 60 hydrocodone/apap 10/325,  
24 20 DS by Dr. S. Desai.

25           i. On 2/10/2011, consumer S.F. had Rx # 597839 filled for 60 hydrocodone/apap  
26 10/325, 20 DS, 13  
27 days early.

28 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer S.K.**

1           45.    Consumer S.K. presented prescriptions to Rite Aid Pharmacy #5429 for  
2 alprazolam, which were filled as follows:

3           a.    On 4/7/2009, consumer S.K. had Rx # 465434 filled for 60 alprazolam 1 mg, 30  
4 DS.

5           b.    On 4/16/2009, consumer S.K. had Rx # 465434 filled for 60 alprazolam 1 mg, 30  
6 DS, 21 days early.

7           c.    On 4/7/2009, consumer S.K. had Rx # 465431 filled for 60 hydrocodone/apap  
8 5/500,30 DS.

9           d..   On 4/16/2009, consumer S.K. had Rx # 465431 filled for 60 hydrocodone/apap 5/500,  
10 21 days early.

11          e.    On 4/23/2009, consumer S.K. had Rx # 471224 filled for 30 zolpidem 10 mg, 30  
12 DS.

13          f.    On 4/30/2009, consumer S.K. had Rx. # 471224 filled for 30 zolpidem 10 mg, 23  
14 days early.

15          g.    On 8/17/2009, consumer S.K. had Rx. # 491855 filled for 30 zolpidem 10 mg, 30  
16 DS.

17          h.    On 8/21/2009, consumer S.K. had Rx. # 491855 filled for 30 zolpidem 10 mg, 26  
18 days early.

19    **Prescriptions presented to Rite Aid Pharmacy #5429 by customer L.L.**

20          46.    Consumer L.L. who went to 7 doctors for prescriptions, and 7 pharmacies, during  
21 this time period presented prescriptions to Rite Aid Pharmacy #5429 for hydrocodone/apap,  
22 which were filled as follows:

23          a.    On 12/2/2011, consumer L.L. had Rx # 666330 filled for 50 hydrocodone/apap  
24 10/325, 12 DS, by Dr. E. Levente.

25          b.    On 12/5/2011, consumer L.L. had Rx # 666330 filled for 50 hydrocodone/apap  
26 10/325, 12 DS, 9 days early.

27          c.    On 12/8/2011. consumer L.L. had Rx 666330 filled for 47 hydrocodone/apap 10/325,  
28 11 DS, 18 days early.

1 d. On 12/11/2011, consumer L.L. had Rx # 666330 filled for 3 Hydrocodone/apap, 1  
2 day supply, 26 days early.

3 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer W.L.**

4 47. Consumer W.L. who went to 28 doctors between April 4, 2011 and January 23,  
5 2012 and a total of 45 doctors for prescriptions, and 7 pharmacies, during this time presented  
6 prescriptions to Rite Aid Pharmacy #5429.

7 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer C.L.**

8 48. Consumer C.L. who went to between approximately 5 to 13 doctors within 5 months  
9 and 9 pharmacies, during this time presented prescriptions to Rite Aid Pharmacy #5429.

10 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer A.M.**

11 49. Consumer A.M. presented prescriptions to Rite Aid Pharmacy #5429 for  
12 hydrocodone/apap, which were filled as follows:

13 a. On 3/15/2011, consumer A.M. had Rx # 604067 filled for 90 hydrocodone/apap  
14 10/325, 30 DS.

15 b. On 3/21/2011, consumer A.M. had Rx # 606134 for 90 hydrocodone/apap 10/325,  
16 30 DS, 24 days early.

17 c. On 4/14/2011, consumer A.M. had Rx # 609993 filled for 90 hydrocodone/apap  
18 10/325 30 DS, 9 days early

19 d. On 5/2/1022, consumer A.M. had Rx # 614878 filled for 90 hydrocodone/apap  
20 10/325, 30 DS, 12 days early

21 e. On 5/12/2011, consumer A.M. had Rx # 617318 filled for 90 hydrocodone/apap  
22 10/325, 30 DS, 20 days early.

23 f. On 5/24/2011, consumer A.M. had Rx # 619777 filled for 90 hydrocodone/apap  
24 10/325, 30 DS. 18 days early.

25 g. On 6/9/2011, consumer A.M. had Rx # 623012 filled for 90 hydrocodone/apap  
26 10/325, 30 DS, 16 days early.

27 h. On 6/28/2011, consumer A.M. had Rx # 624898 filled for 90 hydrocodone/apap  
28 10/325, 30 DS, 11 days early.

1 i. On 7/19/2011, consumer A.M. had Rx # 631706 filled for 90 hydrocodone/apap  
2 10/325,30 DS. 8 days early.

3 j. On 7/29/2011, consumer A.M. had Rx # 634354 filled for 90 hydrocodone/apap  
4 10/325. 30 DS, 20 days early

5 k. On 8/16/2011, consumer A.M. had Rx # 638293 filled for 90 hydrocodone/apap  
6 10/325, 30 DS, 13 days early.

7 l. On 8/31/2011, consumer A.M. had Rx # 641907 filled for 90 hydrocodone/apap  
8 10/325,30 DS, 15 days early.

9 m. On 9/10/2011, consumer A.M. had Rx # 644392 filled for 90 hydrocodone/apap  
10 10/325. 30 DS. 20 days early.

11 n. On 9/13/2011, consumer A.M. had Rx # 645080 filled for 90 hydrocodone/apap  
12 10/325, 30 DS, 27 days early.

13 o. On 9/28/2011, consumer A.M. had Rx # 647790 filled for 90 hydrocodone/apap  
14 10/325, 30 DS, 15 days early.

15 p. On 10/6/2011, consumer A.M. had Rx # 650865 filled for 90 hydrocodone/apap  
16 10/325, 30 DS, 21 days early.

17 q. On 10/28/2011, consumer A.M. had Rx # 653162 filled for 90 hydrocodone/apap  
18 10/325, 30 DS, 8 days early.

19 r. On 11/11/2011, consumer A.M. had Rx # 660732 filled for 90 hydrocodone/apap  
20 10/325, 30 DS, 17 days early.

21 s. On 11/28/2011, consumer A.M. had Rx # 664800 filled for 90 hydrocodone/apap  
22 10/325, 13 days early.

23 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer N.M..**

24 50. Consumer N.M. who went to between approximately 2 to 8 doctors and 6  
25 pharmacies, during this time presented prescriptions to Rite Aid Pharmacy #5429 for  
26 hydrocodone/apap, which were filled as follows:

27 a. On 7/15/2011, consumer N.M. had Rx # 630998 filled for 150 hydrocodone/apap  
28 7.5/750, 37 DS by Dr. J. Borovic.

1           b. On 7/26/2011, consumer N.M. had Rx # 630998 filled for 150 hydrocodone/apap  
2 7.5.750, 37 DS, 26 days early.

3           c. On 8/8/2011, consumer N.M. had Rx # 636130 filled for 150 hydrocodone/apap  
4 7.5.750, 37 DS, 24 days early.

5           d. On 8/12/2011, consumer N.M. had Rx # 637422 filled for 120 hydrocodone/apap  
6 7.5.750, 30 DS, by Dr. A. Weinberg, 33 days early.

7           e. On 9/8/2011, consumer N.M. had Rx # 643767 filled for 60 hydrocodone/apap  
8 7.5.750, 15 DS, by Dr. Weinberg.

9           f. On 9/14/2011, consumer N.M. had Rx # 645560 filled for 150 hydrocodone/apap  
10 7.5.750, 37 DS by Dr. Borovic, 8 days early.

11          g. On 10/12/2011, consumer N.M. had Rx # 652655 filled for 150 hydrocodone/apap  
12 7.5.750, 37 DS, 9 days early.

13          h. On 10/26/2011, consumer N.M. had Rx # 652655 filled for 150 hydrocodone/apap  
14 7.5.750, 37 DS, 23 days early.

15          i. On 11/6/2011, consumer N.M. had Rx # 659168 filled for 60 hydrocodone/apap  
16 7.5.750, 30 DS by Dr., A. Weinberg, 26 days early.

17          j. On 11/18/2011, consumer N.M. had Rx # 662988 filled for 150 hydrocodone/apap  
18 7.5.750, 37 DS, By Dr. Borovic, 18 days early.

19          k. On 12/5/2011, consumer N.M. had Rx # 666997 filled for 150 hydrocodone/apap  
20 7.5.750/ 37 DS, 19 days early.

21          l. On 12/14/2011, consumer N.M. had Rx # 666997 filled for 150 hydrocodone/apap  
22 7.5.750, 37 DS, 28 days early.

23          m. On 1/3/2011, consumer N.M. had Rx # 675571 filled for 150 hydrocodone/apap  
24 7.5.750, 17 days early.

25 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer B.M.**

26           51. Consumer B.M. presented prescriptions to Rite Aid Pharmacy #5429 for  
27 669 DS of Suboxone between 12/2/10 and 12/16/11 totaling 362 days.

28 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer W.M.**



1           52.     Consumer W.M. presented prescriptions to Rite Aid Pharmacy #5429 for  
2 hydrocodone/apap, which were filled as follows:

3           a.     On 9/6/2010, consumer W.M. had Rx #565136 filled for 60 hydrocodone/apap  
4 7.5.750, 30 DS.

5           b.     On 9/29/2010, consumer W.M. had Rx # 567049 filled for 60 hydrocodone/apap  
6 7.5.750, 30 DS, 7 days early.

7           c.     On 1/21/2011, consumer W.M. had Rx # 593582 filled for 60 hydrocodone/apap  
8 7.5.750, 30 DS.

9           d.     On 2/13/2011, consumer W.M. had Rx # 593582 filled for 60 hydrocodone/apap  
10 7.5.750, 30 DS, 7 days early.

11          e.     On 2/3/2009, consumer W.M. had Rx # 448587 filled for 30 hydrocodone/apap  
12 5/500, 30 DS.

13          f.     On 2/6/2009, consumer W.M. had Rx # 448587 filled for 30 hydrocodone/apap  
14 5/500, 30 DS, 27 days early.

15          g.     On 3/3/2009, consumer W.M. had Rx # 461058 filled for 30 hydrocodone/apap  
16 5/500, 30 DS.

17          h.     On 3/26/2009, consumer W.M. had Rx # 461058 filled for 30 hydrocodone/apap  
18 5/500,30 DS, 7 days early.

19          i.     On 4/3/2009, consumer W.M. had Rx # 461058 filled for 30 hydrocodone/apap  
20 5/500, 30 DS, 23 days early.

21          j.     On 4/22/2009, consumer W.M. had Rx # 461058 filled for 30 hydrocodone/apap  
22 5/500, 30 DS. 11 days early .

23          k.     On 5/4/2009, consumer W.M. had Rx # 472874 filled for 30 hydrocodone/apap  
24 5/500,30 DS, 18 days early.

25          l.     On 5/19/2009, consumer W.M. had Rx # 472874 filled for 30 hydrocodone/apap  
26 5/500,30 DS, 18 days early.

27          m.     On 6/11/2009, consumer W.M. had Rx # 472874 filled for 30 hydrocodone/apap  
28 5/500, 30 DS.

1 n. On 6/22/2009, consumer W.M. had Rx # 472874 filled for 30 hydrocodone/apap  
2 5/500, 30 DS, 19 days early.

3 o. On 7/6/2009, consumer W.M. had Rx # 483727 filled for 30 hydrocodone/apap  
4 5/500, 16 days early.

5 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer W.N.**

6 53. Consumer W.N. who went to between approximately 3 and 8 doctors and 7  
7 pharmacies within a year, presented prescriptions to Rite Aid Pharmacy #5429 for  
8 hydrocodone/apap, which were filled as follows:

9 a. On 8/11/2011, consumer W.N. had Rx # 637252 filled for 90 hydrocodone 7.5/750 by  
10 Dr. D. Amos.

11 b. On 8/29/2011, consumer W.N. had Rx # 641282 filled for 90 hydrocodone/apap  
12 7.5/750, 22 DS, 12 days early.

13 c. On 9/12/2011, consumer W.N. had Rx # 644841 filled for 90 hydrocodone/apap  
14 7.5.750, 8 days early.

15 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer R.P.**

16 54. Between March 16, 2010 and January 26, 2012, consumer R.P. went to 19 doctors  
17 for 3 different strengths of hydrocodone/apap, according to records at Rite Aid Pharmacy.  
18 Additional reports showed she saw 23 doctors and went to 13 pharmacies during the same time  
19 period. She presented prescriptions to Rite Aid Pharmacy #5429 for hydrocodone/apap, which  
20 were filled as follows:

21 a. On 12/27/2010, consumer R.P. had Rx # 587948, filled for 60 hydrocodone /apap  
22 7.5/750, 30 DS, by Dr. Rojo.

23 b. On 12/31/2011, consumer R.P. had Rx # 589088 filled for 30 hydrocodone /apap  
24 7.5/750, 10 DS by Dr. M. Kohanima, 26 days early.

25 c. On 3/24/2011, consumer R.P. had Rx # 606889 filled for 50 hydrocodone /apap  
26 7.5/750, 16 DS by Dr. D. Amos.

27 d. On 3/26/2011, consumer R.P. had Rx # 606889 filled for 40 hydrocodone /apap  
28 7.5/750 14 days early.

- 1 e. On 6/1/2011, consumer R.P. had Rx # 621550 filled for 60 hydrocodone /apap  
2 7.5/750, 30 DS by Dr. L. Montecito.
- 3 f. On 6/11/2011, consumer R.P. had Rx # 623563 filled for 35 hydrocodone /apap  
4 7.5/750, 35 DS by Dr. J. Mays, 20 days early.
- 5 g. On 6/16/2011, consumer R.P. had Rx # 624654 filled for 100 hydrocodone /apap  
6 7.5/750, 33 DS by Dr. D Amos, 30 days early.
- 7 h. On 7/7/2011, consumer R.P. had Rx # 629179 filled for 30 hydrocodone /apap  
8 7.5/750, by Dr. F. Chu, 11 days early
- 9 i. On 7/25/2011, consumer R.P. had Rx # 633165 filled for 60 hydrocodone /apap  
10 7.5/750, 20 DS by Dr. N. Anakwenze.
- 11 j. On 8/4/2011, consumer R.P. had Rx # 635513 filled for 60 hydrocodone /apap  
12 7.5/750, 15 DS by Dr. F. Chu, 10 days early.
- 13 k. On 8/25/2011, consumer R.P. had Rx # 640667 filled for 60 hydrocodone /apap  
14 7.5/750, 20 DS, by Dr. N. Anakwenze.
- 15 l. On 9/1/2011, consumer R.P. had Rx # 642283 filled for 60 hydrocodone /apap  
16 7.5/750, 30 DS, 13 days early.
- 17 m. On 9/9/2011, consumer R.P. had Rx # 642283 filled for 60 hydrocodone /apap  
18 7.5/750, 30 DS, 22 days early.
- 19 n. On 9/16/2011, consumer R.P. had Rx # 646279 filled for 60 hydrocodone /apap  
20 7.5/750, 60 DS by Dr. C. Okoye, 23 days early.
- 21 o. On 10/29/2011, consumer R.P. had Rx # 657247 filled for 60 hydrocodone /apap  
22 7.5/750, 30 DS by Dr. C. Okoye.
- 23 p. On 11/14/2011, consumer R.P. had Rx # 660955 filled for 50 hydrocodone /apap  
24 7.5/750 by Dr. J. Soliman, 14 days early.
- 25 q. On 1/22/2011, consumer R.P. had Rx # 593791 filled for 100 hydrocodone/apap  
26 10/325, 33 DS by Dr. M. Kohanim.
- 27 r. On 2/11/2011, consumer R.P. had Rx # 598125 filled for 50 hydrocodone/apap  
28 10/325, 16 DS, 13 days early.

- 1 s. On 2/20/2022, consumer R.P. had Rx # 598125 filled for 50 hydrocodone/apap  
2 10/325, 16 DS, 7 days early.
- 3 t. On 7/14/2011, consumer R.P. had Rx # 630586 filled for 50 hydrocodone/apap  
4 10/325, 12 DS, by Dr. D. Amos.
- 5 u. On 7/15/2011, consumer R.P. had Rx # 630586 filled for 50 hydrocodone/apap  
6 10/325, 12 DS, 11 days early.
- 7 v. On 10/5/2011, consumer R.P. had Rx # 650830 filled for 60 hydrocodone/apap  
8 10/325, 20 DS, by Dr. O. Wallace.
- 9 w. On 10/9/2011, consumer R.P. had Rx # 650830 filled for 30 hydrocodone/apap  
10 10/325, 10 DS, 16 days early.
- 11 x. On 10/10/2011, consumer R.P. had Rx # 651837 filled for 90 hydrocodone/apap  
12 10/325, 30 DS, by J. Rojo, 9 days early.
- 13 y. On 11/21/2011, consumer R.P. had Rx # 663197 filled for 60 hydrocodone/apap  
14 10/325, 15 DS by Dr. A. Sefa.
- 15 z. On 11/23/2011, consumer R.P. had Rx # 663197 filled for 60 hydrocodone/apap  
16 10/325, 15 DS, 13 days early.
- 17 aa. On 12/2/2011, consumer R.P. had Rx # 663197 filled for 120 hydrocodone/apap  
18 10/325,30 DS.
- 19 bb. On 12/19/2011, consumer R.P. had Rx # 663197 filled for 50 hydrocodone/apap  
20 10/325, 12 DS, 13 days early.
- 21 cc. On 12/24/2011, consumer R.P. had Rx # 663197 filled for 70 hydrocodone/apap  
22 10/325, 17 DS, 7 days early.
- 23 dd. On 12/26/2011, consumer R.P. had Rx # 663197 filled for 120 hydrocodone/apap  
24 10/325,30 DS, 13 days early.
- 25 ee. On 1/2/2012, consumer R.P. had Rx # 663197 filled for 50 hydrocodone/apap 10/325,  
26 12 DS, 23 days early.
- 27 ff. On 1/9/2012, consumer R.P. had Rx # 663197 filled for 50 hydrocodone/apap 10/325,  
28 12 DS, 5 days early and filled again on 1/26/2012 for 20 hydrocodone/apap 10/325. 5 DS.

1 gg. On 8/12/2011, consumer R.P. had Rx # 637374 filled for 45 hydrocodone/apap  
2 10/325, 15 DS, by Dr. D. Amos.

3 hh. On 8/13/2011, consumer R.P. had Rx 3 637374 filled for 45 hydrocodone/apap  
4 10/325, 13 days early.

5 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer V.R.**

6 55. Between June 19, 2009 and December 2, 2011, Consumer V.R. went to between  
7 14 and 17 doctors and 31 pharmacies and presented prescriptions to Rite Aid Pharmacy #5429  
8 for alprazolam, hydrocodone/apap and hydromorphone which were filled as follows:

9 a. On 7/12/2010, consumer V.R. had Rx # 554375 filled for 60 alprazolam 2 mg, 30 DS  
10 by Dr. D. Amos.

11 b. On 7/17/2010, consumer V.R. had Rx # 555618 filled for 60 alprazolam 2 mg, 30 DS,  
12 by Dr. J. Rojo, 25 days early.

13 c. On 7/31/2010, consumer V.R. had Rx # 558330, filled for 60 alprazolam 2 mg, 30 DS  
14 by Dr. D. Amos, 16 days early.

15 d. On 8/11/2011, consumer V.R. had Rx # 560524 filled for 60 alprazolam 2 mg, 30 DS,  
16 19 days early.

17 e. On 8/23/2010, consumer V.R. had Rx # 562722 filled for 60 alprazolam 2 mg, 30 DS  
18 by Dr. J. Rojo, 18 days early.

19 f. On 8/31/2010, consumer V.R. had Rx # 564090 filled for 60 alprazolam 2 mg, 30 DS  
20 by Dr. D. Amos, 22 days early.

21 g. On 9/13/2010, consumer V.R. had Rx # 566913 filled for 60 alprazolam 2 mg, 30 DS,  
22 17 days early.

23 h. On 10/4/2010, consumer V.R. had Rx # 570951 filled for 60 alprazolam 2 mg, 15 DS,  
24 9 days early.

25 i. On 10/18/2010, consumer V.R. had Rx # 573685 filled for 60 alprazolam 2 mg, 30  
26 DS by J. Rojo.

27 j. On 10/28/2010, consumer V.R. had Rx # 576028 filled for 60 alprazolam 2 mg, by  
28 Dr. D. Amos, 20 days early.

- 1 k. On 9/2/2009, consumer V.R. had Rx # 495064 filled for 45 hydrocodone/apap  
2 7.5/750, 22 DS by Dr. D. Amos.
- 3 l. On 9/8/2009, consumer V.R. had Rx # 495064 filled for 45 hydrocodone/apap  
4 7.5/750, 22 DS, 16 days early.
- 5 m. On 9/21/2009, consumer V.R. had Rx # 495064 filled for 45 hydrocodone/apap  
6 7.5/750, 22 DS, 9 days early.
- 7 n. On 10/12/2009, consumer V.R. had Rx # 499979 filled for 120 hydrocodone/apap  
8 7.5/750, 40 DS by Dr. J. Greenfield.
- 9 o. On 10/19/2009 consumer V.R. had Rx # 495064 filled for 45 hydrocodone/apap  
10 7.5/750, 22 DS, 33 days early.
- 11 p. On 10/21/2009, consumer V.R. had Rx # 503510 filled for 100 hydrocodone/apap  
12 7.5/750, 33 DS by Dr. M. Akhavan, 19 days early.
- 13 q. On 11/6/2009, consumer V.R. had Rx # 507006 filled for 30 hydrocodone/apap  
14 7.5/750, 30 DS by Dr. D. Amos, 17 days early.
- 15 r. On 11/24/2009, consumer V.R. had Rx # 510363, filled for 90 hydrocodone/apap  
16 7.5/750,30 DS, by Dr. M Akhavan, 12 days early.
- 17 s. On 12/4/2009, consumer V.R. had Rx # 511575 filled for 90 hydrocodone/apap  
18 7.5/750, 30 DS, by Dr. F. Rundall, 19 days early.
- 19 t. On 12/8/2009, consumer V.R. had Rx # 512581 filled for 30 hydrocodone/apap  
20 7.5/750, 10 DS, by Dr. J. Rojo, 26 days early.
- 21 u. On 12/10/2009, consumer V.R. had Rx # 513248 filled for 30 hydrocodone/apap  
22 7.5/750, 30 DS, by Dr. B. Chabra, 8 days early.
- 23 v. On 12/18/2009, consumer V.R. had Rx # 514733 filled for 90 hydrocodone/apap  
24 7.5/750, 30 DS by Dr. G. Ma, 22 days early.
- 25 w. On 1/15/2010, consumer V.R. had Rx # 519875 filled for 90 hydrocodone/apap  
26 7.5/750, 30 DS, by Dr. F. Rundall.
- 27 x. On 1/21/2010, consumer V.R. had Rx # 520810 filled for 50 hydrocodone/apap  
28 7.5/750, 12 DS, by Dr. N. Anakwenze, 24 days early.

- 1 y. On 1/26/2010, consumer V.R. had Rx # 510818 filled for 50 hydrocodone/apap  
2 7.5/750, 12 DS, 7 days early.
- 3 z. On 1/30/2010, consumer V.R. had Rx # 520818 filled for 50 hydrocodone/apap  
4 7.5/750, 12 DS, 8 days early.
- 5 aa. On 2/4/2010, consumer V.R. had Rx # 523224 filled for 60 hydrocodone/apap  
6 7.5/750, 15 DS, 7 days early.
- 7 bb. On 2/22/2010, consumer V.R. had Rx # 522650 filled for 60 hydrocodone/apap  
8 7.5/750, 30 DS, by Dr. J. Slusher.
- 9 cc. On 2/26/2010, consumer V.R. had Rx # 526671 filled for 60 hydrocodone/apap  
10 7.5/750, 30 DS, 26 days early.
- 11 dd. On 3/11/2010, consumer V.R. had Rx # 527877 filled for 60 hydrocodone/apap  
12 7.5/750, 15 DS by Dr. J. Rojo, 27 days early.
- 13 ee. On 3/9/2010, consumer V.R. had Rx # 527877 filled for 60 hydrocodone/apap  
14 7.5/750, 15 DS, 7 days early.
- 15 ff. On 3/13/2010, consumer V.R. had Rx # 527877 filled for 60 hydrocodone/apap  
16 7.5/750, 15 DS, 11 days early.
- 17 gg. On 3/18/2010, consumer V.R. had Rx # 531783 filled for 60 hydrocodone/apap  
18 7.5/750, 15 DS, 10 days early.
- 19 hh. On 3/29/2010, consumer V.R. had Rx # 533630 filled for 60 hydrocodone/apap  
20 7.5/750, 15 DS.
- 21 ii. On 4/5/20010, consumer V.R. had Rx # 535125 filled for 60 hydrocodone/apap  
22 7.5/750, 8 days early.
- 23 jj. On 5/6/2010, consumer V.R. had Rx # 541344 filled for 60 hydrocodone/apap  
24 7.5/750, 30 DS, by Dr. D. Amos.
- 25 kk. On 5/18/2010, consumer V.R. had Rx 543672 filled for 90 hydrocodone/apap 7.5/750  
26 30 DS, by Dr. M. Akhavanim, 18 days early.
- 27 ll. On 5/21/2010, consumer V.R. had Rx # 544470 filled for 50 hydrocodone/apap  
28 7.5/750, 12 DS, by Dr. N. Anakwenzie, 27 days early.

1 mm. On 6/7/2010, consumer V.R. had Rx # 547419 filled for 60 hydrocodone/apap  
2 7.5/750, 30 DS, by Dr. J. Rojo.

3 nn. On 6/22/2010, consumer V.R. had Rx # 550599 filled for 90 hydrocodone/apap  
4 7.5/750, 30 DS, by Dr. M Akhavanim, 15 days early.

5 oo. On 7/21/2010, consumer V.R. had Rx # 556218 filled for 90 hydrocodone/apap  
6 7.5/750, 30 DS by Dr. G. Ma.

7 pp. On 7/26/2010, consumer V.R. had Rx # 557330 filled for 60 hydrocodone/apap  
8 7.5/750, 30 DS, by Dr. D. Amos, 25 days early.

9 qq. On 6/16/2010, consumer V.R. had Rx # 549423, was filled for 100 hydrocodone/apap  
10 10/325, 50 DS, by Dr. D. Amos.

11 rr. On 6/24/2010, consumer V.R. had Rx # 551051, filled for 90 hydrocodone/apap  
12 10/325, 45 DS, 42 days early.

13 ss. On 7/12/2010, consumer V.R. had Rx # 554376 filled for 90 hydrocodone/apap  
14 10/325,20 DS, 27 days early.

15 tt. On 10/12/2010, consumer V.R. had two prescriptions Rx # 572546 and Rx # 572593  
16 filled for 120 hydromorphone 4 mg, for a total 40 DS, by Dr. D. Amos.

17 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer L.R.**

18 56. Between July 18, 2009 and November 12, 2011, Consumer L.R. went to between 5  
19 and 8 doctors and 17 pharmacies and presented prescriptions to Rite Aid Pharmacy #5429 for  
20 diazepam and hydrocodone/apap which were filled as follows:

21 a. On 11/1/2011, consumer L.R. had Rx # 657799 filled for 30 diazepam 10 mg, 30 DS,  
22 by Dr. J. Mays.

23 b. On 11/21/2011, consumer L.R. had Rx # 661116 filled for 30 diazepam 10 mg, 10  
24 days early.

25 c. On 1/9/2010, consumer L.R. had Rx # 518589 filled for 38 hydrocodone/apap  
26 7.5/750, 12 DS by Dr. S. Dela Rosa.

27 d. On 1/12/2010, consumer L.R. had Rx # 518589 filled for 22 hydrocodone/apap  
28 7.5/750, 9 days early.



1 e. On 8/11/2011, consumer L.R. had Rx # 637099 filled for 35 hydrocodone/apap  
2 7.5/750, 35 DS by Dr. J. Mays.

3 f. On 8/17/2011, consumer L.R. had Rx # 638501 filled for 25 hydrocodone/apap  
4 7.5/750, 25 DS by Dr. S. De la Rosa, 29 days early.

5 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer D.R.**

6 57. Consumer D.R. presented prescriptions to Rite Aid Pharmacy #5429 for  
7 acetaminophen-cod, which were filled as follows:

8 a. On 3/3/2010, consumer D.R. had Rx # 528616 filled for 90 acetaminophen-cod #3,  
9 30 DS by Dr. D. Sanchez.

10 b. On 3/22/2010, consumer D.R. had Rx # 532371 filled for 90 acetaminophen-cod #3,  
11 11 days early.

12 c. On 6/7/2010, consumer D.R. had Rx # 547239 filled for 150 acetaminophen-cod #3,  
13 18 DS.

14 d. On 6/17/2010, consumer D.R. had Rx # 547239 filled for 150 acetaminophen-cod #3,  
15 8 days early.

16 e. On 2/25/2011, consumer D.R. had Rx # 599682 filled for 175 acetaminophen-cod #3.  
17 58 DS.

18 f. On 3/10/2011, consumer D.R. had Rx # 599682 filled for 50 acetaminophen-cod #3,  
19 16 DS, 43 days early.

20 g. On 3/15/2011, consumer D.R. had Rx # 599682 filled for 50 acetaminophen-cod #3,  
21 16 DS, 9 days early.

22 h. On 3/22/2011, consumer D.R. had Rx # 606281 filled for 75 acetaminophen-cod #3,  
23 25 DS.

24 i. On 3/30/2011, consumer D.R. had Rx # 608355 filled for 175 acetaminophen-cod #3,  
25 43 DS, 17 days early.

26 j. On 4/9/2011, consumer D.R. had Rx # 608355 filled for 50 acetaminophen-cod #3.  
27 12 DS, 33 days early.

28

1 k. On 4/14/2011, consumer D.R. had Rx # 608355 filled for 50 acetaminophen-cod #3,  
2 12 DS, 7 days early.

3 l. On 4/20/2011, consumer D.R. had Rx # 608355 filled for 75 acetaminophen-cod #3,  
4 6 days early.

5 m. On 4/25/2011, consumer D.R. had Rx 613355 filled for 75 acetaminophen-cod #3, 18  
6 DS 13 days early.

7 n. On 5/2/2011, consumer D.R. had Rx 613355 filled for 175 acetaminophen-cod #3, 43  
8 DS, 10 days early.

9 o. On 5/9/2011, consumer D.R. had Rx # 613355 filled for 100 acetaminophen-cod #3,  
10 25 DS, 34 days early

11 p. On 5/18/2011, consumer D.R. had Rx # 618466 filled for 175 acetaminophen-cod #3,  
12 43 DS, 16 days early.

13 q. On 5/27/2011, consumer D.R. had Rx # 618466 filled for 175 acetaminophen-cod #3,  
14 34 days early.

15 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer A.R.**

16 58. Between June 9, 2009 and January 2, 2012, Consumer A.R. went to between 4 and 11  
17 doctors and 8 pharmacies and presented prescriptions to Rite Aid Pharmacy #5429 for  
18 hydrocodone/apap which were filled as follows:

19 a. On 6/9/2010, consumer A.R. had Rx # 547647 filled for 90 hydrocodone/apap  
20 7.5/750, 30 DS, by Dr. Guzman

21 b. On 6/29/2010, consumer A.R. had Rx # 547647 filled for 90 hydrocodone/apap  
22 7.5/750, 10 days early.

23 c. On 10/18/2010, consumer A.R. had Rx # 573565 filled for 90 hydrocodone/apap  
24 7.5/750,30 DS by Dr. G. Lopez.

25 d. On 11/1/2010, consumer A.R. had Rx # 573565 filled for 90 hydrocodone/apap  
26 7.5/750, 30 DS, 17 days early.

27 e. On 11/26/2010, consumer A.R. had Rx # 573565 filled for 90 hydrocodone/apap  
28 7.5/750,30 DS.

- 1 f. On 12/9/2010, consumer A.R. had Rx # 573565 filled for 90 hydrocodone/apap  
2 7.5/750, 30 DS, 17 days early.
- 3 g. On 12/26/2010, consumer A.R. had Rx # 587894 filled for 90 hydrocodone/apap  
4 7.5/750, 30 DS, 13 days early.
- 5 h. On 1/2/2011, consumer A.R. had Rx # 587894 filled for 90 hydrocodone/apap  
6 7.5/750, 30 DS. 23 days early.
- 7 i. On 1/17/2011, consumer A.R. had Rx # 592578 filled for 100 hydrocodone/apap  
8 7.5/750, 33 DS, 15 days early.
- 9 j. On 2/1/2011, consumer A.R. had Rx # 592578 filled for 100 hydrocodone/apap  
10 7.51750, 33 DS, 18 days early.
- 11 k. On 2/17/2011, consumer A.R. had Rx #592578 filled for 100 hydrocodone/apap  
12 7.5/750, 33 DS, 17 days early.
- 13 l. On 2/28/2011, consumer A.R. had Rx # 592578 filled for 100 hydrocodone/apap  
14 7.5/750, 33 DS, 22 days early
- 15 m. On 3/23/2011, consumer A.R. had Rx # 604495, filled for 100 hydrocodone/apap  
16 7.5/750, 33 DS.
- 17 n. On 4/13/2011, consumer A.R. had Rx # 611358 filled for 100 hydrocodone/apap  
18 7.5/750, 33 DS 13 days early.
- 19 o. On 5/2/2011, consumer A.R. had Rx # 614887 filled for 100 hydrocodone/apap  
20 7.5/750, 33 DS, 15 days early.
- 21 p. On 8/28/2011, consumer A.R. had Rx # 629238 filled for 120 hydrocodone/apap  
22 7.5/750, 30 DS.
- 23 q. On 9/14/2011, consumer A.R. had Rx # 639940 filled for 120 hydrocodone/apap  
24 7.5/750, 30 DS. 11 days early.
- 25 r. On 10/7/2011, consumer A.R. had Rx # 639940 filled for 120 hydrocodone/apap  
26 7.5/750, 7 days early
- 27 s. On 10/24/2011, consumer A.R. had Rx 639940 filled for 120 hydrocodone/apap  
28 7.5/750, 30 DS, 13 days early.

1 t. On 11/13/2011, consumer A.R. had Rx # 639940 filled for 120 hydrocodone/apap  
2 7.5/750, 30 DS, 10 days early.

3 u. On 11/28/2011, consumer A.R. had Rx # 664552 filled for 120 hydrocodone/apap  
4 7.5/750, 30 Ds, 15 days early.

5 v. On 12/15/2011, consumer A.R. had Rx # 670541 filled for 120 hydrocodone/apap  
6 7.5/750, 30 DS, 13 days early.

7 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer M.S..**

8 59. Consumer M.S. presented prescriptions to Rite Aid Pharmacy #5429 for alprazolam  
9 which were filled as follows:

10 a. On 10/23/2010, consumer M.S. had Rx # 575001 filled for 30 alprazolam 2 mg, 15  
11 DS.

12 b. On 10/24/2010, consumer M.S. had Rx # 575001 filled for 30 alprazolam 2 mg, 15  
13 DS, 14 days early.

14 c. On 11/1/2010, consumer M.S. had Rx # 578564 filled for 50 alprazolam 2 mg, 25 DS.

15 d. On 11/12/2010, consumer M.S. had Rx # 578564 filled for 25 alprazolam 12 DS, 24  
16 days early.

17 e. On 2/4/2011, consumer M.S. had Rx # 596633 filled for 60 alprazolam 2 mg, 30 DS.

18 f. On 2/18/2011, consumer M.S. had Rx # 599561 filled for 60 alprazolam 2 mg, 30 DS,  
19 16 days early.

20 g. On 2/25/2011, consumer M.S. had Rx # 599561 filled for 30 alprazolam 2 mg, 15 DS,  
21 23 days early.

22 h. On 2/26/2011, consumer M.S. had Rx # 599561 filled for 30 alprazolam 2 mg, 15 Ds,  
23 14 days early.

24 i. On 10/23/2010, consumer M.S. had Rx # 575000 filled for 50 hydrocodone/apap  
25 10/325, 12 DS.

26 j. On 10/24/2010, consumer M.S. had Rx # 575000 filled for 50 hydrocodone/apap  
27 10/325, 11 days early.

28 ///

1 **Prescriptions presented to Rite Aid Pharmacy #5429 by customer B.W.**

2 60. Between April 10, 2009 and October 22, 2011, Consumer B.W. went to between 6  
3 and 15 doctors and 14 pharmacies and presented prescriptions to Rite Aid Pharmacy #5429 for  
4 clonazepam and hydrocodone/apap which were filled as follows:

5 a. On 4/9/2009, consumer B.W. had Rx # 468444 filled for 30 clonazepam 2 mg, 15 DS  
6 by Dr. Z. Lin.

7 b. On 4/13/2009, consumer B.W. had Rx # 468444, filled for 30 clonazepman 2 mg, 11  
8 days early.

9 c. On 7/9/2009, consumer B.W. had Rx # 485094 filled for 30 clonazepam 2 mg, 15 DS.

10 d. On 7/10/2009, consumer B.W. had Rx # 485094 filled for 20 clonazepam 2 mg, 10  
11 DS, 14 days early.

12 e. On 6/22/2010, consumer B.W. had Rx # 550558 filled for 60 clonazepam 2 mg, 30  
13 DS by Dr. M. Nasir.

14 f. On 7/2/2010, consumer B.W. had Rx # 552659 filled for 30 Clonazepam 2 mg, 15  
15 DS, by Dr. Z. Lin, 20 days early.

16 g. On 7/3/2010, consumer B.W. had Rx # 552659 filled for 30 clonazepam 2 mg, 15 DS,  
17 14 days early.

18 h. On 10/14/2010, consumer B.W. had Rx # 573129 filled for 70 hydrocodone/apap  
19 7.5/750, 23 DS, by Dr. M Nasir.

20 i. On 10/28/2010, consumer B.W. had Rx # 576119 filled for 90 hydrocodone/apap  
21 7.5/750, 30 DS, by Dr. I. Shah, 9 days early.

22 j. On 11/11/2010, consumer B.W. had Rx # 578906 filled for 70 hydrocodone/apap  
23 7.5/750, 35 DS, by Dr. Nasir, 21 days early.

24 k. On 12/3/2010, consumer B.W. had Rx # 583554 filled for 90 hydrocodone/apap  
25 7.5/750, 30 DS, 13 days early.

26 l. On 12/16/2010, consumer B.W. had Rx # 586388 filled for 90 hydrocodone/apap  
27 7.5/750, 30 DS by Dr. I Shah, 17 days early

28

1 m. On 1/28/2011, consumer B.W. had Rx # 595063 filled for 60 hydrocodone/apap  
2 7.5/750, 30 DS by Dr. M. Nasir.

3 n. On 2/11/2011, consumer B.W. had Rx # 598142 filled for 90 hydrocodone/apap  
4 7.5/750, 30 DS, by Dr. I. Shah. 16 days early.

5 **SECOND CAUSE FOR DISCIPLINE**

6 (Non-Complaint Refilling of Controlled Substance Prescriptions )

7 (Respondents Rite Aid Pharmacy and Chung)

8 61. Respondents Rite Aid Pharmacy and Chung, are subject to under sections 4300 and  
9 4301, subdivision (d) and (o) of the Business and Professions Code, for unprofessional conduct,  
10 for violating Health and Safety Code section 11200, subd. (b), in that Respondents refilled  
11 prescriptions more than 5 times and in amount, for all refills of that prescription taken together,  
12 exceeded a 120-day supply. The circumstances are as follows:

13 62. On or about 6/2/2010, Rx # 544315 filled for 30 triazolam 0.25, 30 DS for Mr. R.C.  
14 and filled on 6/30/2010, 7/26/2010, 8/17/2010, 9/8/2010 and 9/30/2010 for 30 triazolam 0.25, 30  
15 DS for total of 150 days supply.

16 63. On 11/21/2011, Rx # 663197 filled for 60 hydrocodone/apap 10/325 15 DS for Ms.  
17 R.P by Dr. A. Sefa. Rx # 663197 was subsequently refilled by Respondent Rite Aid Pharmacy  
18 #5429 as follow: On 11/23/2011 for 60 hydrocodone/apap 10/325, 15 DS; on 12/2/2011 for 120  
19 hydrocodone/apap 10/325,30 DS; on 12/19/2011, for 50 hydrocodone/apap 10/325, 12 DS; on  
20 12/24/2011 for 70 hydrocodone/apap 10/325, 17 DS; on 12/26/2011 for 120 hydrocodone/apap  
21 10/325, 30 DS; on 1/2/2012 for 50 hydrocodone/apap 10/325, 12 DS; on 1/9/2012 for 50  
22 hydrocodone/apap 10/325, 12 Day; and on 1/26/2012 for 20 hydrocodone/apap 10/325, 5 DS. In  
23 total, Rx # 663197 filled 8 times for a total of 148 days supply.

24 **THIRD CAUSE FOR DISCIPLINE**

25 (Non-Compliant Transferring of a Controlled Substance Prescription)

26 (Respondents Rite Aid and Chung)

27 64. Respondents Rite Aid Pharmacy and Chung, are subject to discipline under sections  
28 4300 and 4301, subdivision (d) and (o) of the Business and Professions Code, for unprofessional

1 conduct, for violating title 16, section 1717, subdivision (e), in that Respondent Rite Aid  
2 Pharmacy transferred prescriptions for Schedule III, IV or V controlled substances to another for  
3 refill that did not include the requisite information required under Title 21, Code of Federal  
4 Regulations, section 1306.25. The circumstances were as follows:

5 65. On or about Rite Aid Pharmacy #5429, located at 500 S. Broadway in Los Angeles,  
6 CA, 90013 transferred prescriptions from other pharmacies on the following dates and  
7 prescription numbers:

8 a. As to Rx # 491888, dated August 17, 2009, for 120 Norco 7.5/325 for Ms. A.L., a  
9 copy of the prescription was faxed from Rite Aid #5345, Portland Oregon. It did not contain the  
10 identification of the pharmacist transferring the information, the name and address of both  
11 pharmacies, the last dispensing date, the number of refills remaining but not dispensed, nor the  
12 number of refills transferred.

13 b. As to Rx # 550442, dated June 22, 2010, for Ms. A.L. for 120 Hydrocodone/apap  
14 7.5/325, a notation was included that stated transferred Rx # 426595 from 5345 only. It did not  
15 contain the identification of the pharmacist transferring the information, the name and address of  
16 both pharmacies, the last dispensing date, the number of refills remaining but not dispensed, nor  
17 the number of refills transferred.

18 c. As to Rx # 601131, dated February 28, 2011, for Ms. A.L. for 84 Hydrocodone/apap  
19 7.5/325, a notation stated transferred Rx # 426595 from 5345 only. It did not contain the  
20 identification of the pharmacist transferring the information, the name and address of both  
21 pharmacies, the last dispensing date, the number of refills remaining but not dispensed, nor the  
22 number of refills transferred.

23 d. As to Rx # 640471, dated August 26, 2011, for Ms. A.L. for 120 Hydrocodone/apap  
24 7.5/325, a notation stated transferred Rx # 446599 from 5345 only. It did not contain the  
25 identification of the pharmacist transferring the information, the name and address of both  
26 pharmacies, the last dispensing date, the number of refills remaining but not dispensed, nor the  
27 number of refills transferred.

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1 e. As to Rx # 656273, dated October 26, 2011, for Ms. A.L. for 84 Hydrocodone/apap  
2 7.5/325 a notation stated transferred from Rite# 5345 only. It did not contain the identification of  
3 the pharmacist transferring the information, the name and address of both pharmacies, the last  
4 dispensing date, the number of refills remaining but not dispensed, nor the number of refills  
5 transferred.

6 **FOURTH CAUSE FOR DISCIPLINE**

7 (Conduct that Subverts or Attempts to Subvert an Investigation by the Board )

8 (Respondents Rite Aid Pharmacy and Chung)

9 66. Respondents Rite Aid Pharmacy and Chung are subject to disciplinary action under  
10 section Business and Professions Code section 4301 subd. (q) for unprofessional conduct in that  
11 Respondents engaged in conduct that subverts or attempts to subvert an investigation of the  
12 Board. The circumstances are as follows:

13 67. Respondents refused to provide original prescription documents requested by the  
14 Board in writing dated October 18, 2012.

15 **PRAYER**

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

- 18 1. Revoking or suspending Pharmacy Permit Number PHY 42331, issued to Rite Aid  
19 Pharmacy # 5429;
- 20 2. Revoking or suspending Original Pharmacy License Number RPH 40932, issued to  
21 Anne Chon-Yin Chung aka Anne Chung;
- 22 3. Ordering Rite Aid Pharmacy # 5429 to pay the Board of Pharmacy the reasonable  
23 costs of the investigation and enforcement of this case, pursuant to Business and Professions  
24 Code section 125.3;

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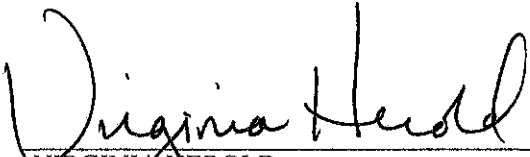
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4. Ordering Anne Chon-Yin Chung to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

5. Taking such other and further action as deemed necessary and proper.

DATED: 3/14/14   
VIRGINIA HEROLD  
Executive Officer  
Board of Pharmacy  
Department of Consumer Affairs  
State of California  
*Complainant*

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