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

In the Matter of the Accusation Against: **TILTON NGUYEN PHARMACEUTICAL INC. DBA OASIS PHARMACY, PAULINE MINH TILTON, PRESIDENT** 15433 W. Sand St., Ste. 102 Victorville, CA 92392 **Pharmacy Permit No. PHY 53859,** **and** **PAULINE MINH TILTON** 15433 W. Sand St., Ste. 102 Victorville, CA 92392 **Pharmacist License No. RPH 47537** Respondents.	Case No. 6608 **DEFAULT DECISION AND ORDER** [Gov. Code, §11520]

FINDINGS OF FACT

1. On or about June 7, 2019, Complainant Anne Sodergren, in her official capacity as the Interim Executive Officer of the Board of Pharmacy, Department of Consumer Affairs, filed Accusation No. 6608 against Tilton Nguyen Pharmaceutical Inc. dba Oasis Pharmacy, Pauline Minh Tilton (Respondent) before the Board of Pharmacy. (Accusation attached as Exhibit A.)

2. On or about December 1, 2015, the Board of Pharmacy issued Pharmacy Permit Number PHY 53859 to Tilton Nguyen Pharmaceutical Inc. doing business as Oasis Pharmacy, with Pauline Minh Tilton as the President, 100% shareholder, Director, Secretary and Treasurer/Chief Financial Officer ("Respondent Pharmacy"). The Pharmacy Permit was in full force and effect at all times relevant to the charges brought herein but was cancelled on October 10, 2019.

3. On or about August 12, 1994, the Board of Pharmacy issued Pharmacist License Number RPH 47537 to Pauline Minh Tilton ("Respondent Tilton"). The Pharmacist License was in full force and effect at all times relevant to the charges brought herein and will expire on June 30, 2020, unless renewed.

4. On or about June 12, 2019, Respondents were served by Certified and First Class Mail copies of the Accusation No. 6608, Statement to Respondent, Notice of Defense, Request for Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6, and 11507.7) at Respondents' address of record which, pursuant to Business and Professions Code section 4100, is required to be reported and maintained with the Board. Respondents' address of record was and is: 15433 W. Sand St., Ste. 102, Victorville, CA 92392.

5. Service of the Accusation was effective as a matter of law under the provisions of Government Code section 11505(c) and/or Business and Professions Code section 124.

6. Government Code section 11506(c) states, in pertinent part:

> (c) The respondent shall be entitled to a hearing on the merits if the respondent files a notice of defense . . . and the notice shall be deemed a specific denial of all parts of the accusation . . . not expressly admitted. Failure to file a notice of defense . . . shall constitute a waiver of respondent's right to a hearing, but the agency in its discretion may nevertheless grant a hearing.

7. The Board takes official notice of its records and the fact that Respondents failed to file a Notice of Defense within fifteen (15) days after service upon them of the Accusation, and therefore waived their right to a hearing on the merits of Accusation No. 6608.

8. California Government Code section 11520(a) states, in pertinent part:

> (a) If the respondent either fails to file a notice of defense . . . or to appear at the hearing, the agency may take action based upon the respondent's express admissions or upon other evidence and affidavits may be used as evidence without any notice to respondent . . . .

9. Pursuant to its authority under Government Code section 11520, the Board finds Respondents are in default. The Board will take action without further hearing and, based on the relevant evidence contained in the Default Decision Investigatory Evidence Packet in this matter, as well as taking official notice of all the investigatory reports, exhibits and statements contained therein on file at the Board's offices regarding the allegations contained in Accusation No. 6608, finds that the charges and allegations in Accusation No. 6608, are separately and severally, found to be true and correct by clear and convincing evidence.

10. The Board finds that the actual costs for Investigation and Enforcement are $15,394.75 as of October 18, 2019.

DETERMINATION OF ISSUES

1. Based on the foregoing findings of fact, Respondent Pharmacy has subjected its Pharmacy Permit No. PHY 53859 to discipline and Respondent Tilton has subjected her Pharmacist License No. RPH 47537 to discipline.

2. The agency has jurisdiction to adjudicate this case by default.

3. The Board of Pharmacy is authorized to revoke Respondent Pharmacy's Pharmacy Permit and Respondent Tilton's Pharmacist License based upon the following violations alleged in the Accusation which are supported by the evidence contained in the Default Decision Investigatory Evidence Packet in this case:

a. Violations of Corresponding Responsibility - Code section 4301, subdivisions (d), (j) and/or (o) and CCR, title 16, section 1761, subdivisions (a) and (b), in conjunction with Code

sections 4036.5 and 4113, Health and Safety Code section 11153, subdivision (a) and Code of Federal Regulations Title 21, section 1306.04, subdivision (a); and

b. Failure to Comply with Requirements for Controlled Substance Program - Code section 4301, subdivisions (d), (j) and/or (o) and CCR, title 16, section 1761, subdivisions (a) and (b), in conjunction with Code sections 4036.5 and 4113, Health and Safety Code sections 11164 and 11162.1, and Code of Federal Regulations Title 21, section 1306.04, subdivision (a).

ORDER

IT IS SO ORDERED that Pharmacy Permit No. PHY 53859, issued to Tilton Nguyen Pharmaceutical Inc. doing business as Oasis Pharmacy, with Pauline Minh Tilton as the President, 100% shareholder, Director, Secretary and Treasurer/Chief Financial Officer, is revoked.

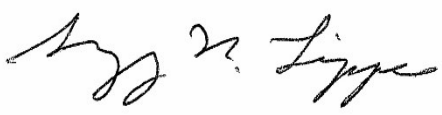
IT IS SO ORDERED that Pharmacist License No. RPH 47537 issued to Respondent Pauline Minh Tilton, is revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondents may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondents. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on January 23, 2020 at 5:00 p.m .

It is so ORDERED on December 24, 2019.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By 

Greg Lippe
Board President

53829737.DOCX
DOJ Matter ID:LA2018603001

Attachment:
Exhibit A: Accusation

Exhibit A

Accusation

(TILTON NGUYEN PHARMACEUTICAL INC. DBA OASIS PHARMACY and PAULINE MINH TILTON)

XAVIER BECERRA
Attorney General of California
LINDA K. SCHNEIDER
Senior Assistant Attorney General
ARMANDO ZAMBRANO
Supervising Deputy Attorney General
State Bar No. 225325
300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 269-6322
Facsimile: (213) 897-2804
Attorneys for Complainant

BEFORE THE
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In the Matter of the Accusation Against: **TILTON NGUYEN PHARMACEUTICAL INC. DBA OASIS PHARMACY, PAULINE MINH TILTON, PRESIDENT** 15433 W. Sand St., Ste. 102 Victorville, CA 92392 **Pharmacy Permit No. PHY 53859,** **and** **PAULINE MINH TILTON** 15433 W. Sand St., Ste. 102 Victorville, CA 92392 **Pharmacist License No. RPH 47537** Respondents.	Case No. 6608 **ACCUSATION**

Complainant alleges:

PARTIES

1. Anne Sodergren ("Complainant") brings this Accusation solely in her official capacity as the Interim Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.

2. On or about December 1, 2015, the Board of Pharmacy issued Pharmacy Permit Number PHY 53859 to Tilton Nguyen Pharmaceutical Inc. doing business as Oasis Pharmacy, with Pauline Minh Tilton as the President, 100% shareholder, Director, Secretary and Treasurer/Chief Financial Officer ("Respondent Pharmacy"). The Pharmacy Permit was in full force and effect at all times relevant to the charges brought herein and will expire on December 1, 2019, unless renewed.

3. On or about August 12, 1994, the Board of Pharmacy issued Pharmacist License Number RPH 47537 to Pauline Minh Tilton ("Respondent Tilton"). The Pharmacist License was in full force and effect at all times relevant to the charges brought herein and will expire on June 30, 2020, unless renewed.

JURISDICTION

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

5. Code section 4300 provides, in pertinent part, that every license issued by the Board is subject to discipline, including suspension or revocation.

6. Code section 4300.1 states:

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

STATUTORY PROVISIONS

7. Code section 4022 of the Code states

"'Dangerous drug' or 'dangerous device' means any drug or device unsafe for self use in humans or animals, and includes the following:

(a) Any drug that bears the legend: 'Caution: federal law prohibits dispensing without prescription,' 'Rx only,' or words of similar import.

(b) Any device that bears the statement: 'Caution: federal law restricts this device to sale by or on the order of a _____,' 'Rx only,' or words of similar import, the blank to be filled in with the designation of the practitioner licensed to use or order use of the device.

(c) Any other drug or device that by federal or state law can be lawfully dispensed only on prescription or furnished pursuant to Section 4006."

8. Code section 4036.5 states that "'Pharmacist-in-charge' means a pharmacist proposed by a pharmacy and approved by the board as the supervisor or manager responsible for ensuring the pharmacy's compliance with all state and federal laws and regulations pertaining to the practice of pharmacy."

9. Code section 4059, subdivision (a), in pertinent part, prohibits furnishing of any dangerous drug or dangerous device except upon the prescription of an authorized prescriber.

10. Code section 4113 states, in pertinent part, that: "(c) The pharmacist-in-charge shall be responsible for a pharmacy's compliance with all state and federal laws and regulations pertaining to the practice of pharmacy."

11. Code section 4301 provides, in pertinent part:

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

. . .

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

. . .

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

. . .

(o) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of or conspiring to violate any provision or term of this chapter or of the applicable

federal and state laws and regulations governing pharmacy, including regulations established by the board or by any other state or federal regulatory agency."

12. Section 4306.5 states:

"Unprofessional conduct for a pharmacist may include any of the following:

(a) Acts or omissions that involve, in whole or in part, the inappropriate exercise of his or her education, training, or experience as a pharmacist, whether or not the act or omission arises in the course of the practice of pharmacy or the ownership, management, administration, or operation of a pharmacy or other entity licensed by the board.

(b) Acts or omissions that involve, in whole or in part, the failure to exercise or implement his or her best professional judgment or corresponding responsibility with regard to the dispensing or furnishing of controlled substances, dangerous drugs, or dangerous devices, or with regard to the provision of services.

(c) Acts or omissions that involve, in whole or in part, the failure to consult appropriate patient, prescription, and other records pertaining to the performance of any pharmacy function.

(d) Acts or omissions that involve, in whole or in part, the failure to fully maintain and retain appropriate patient-specific information pertaining to the performance of any pharmacy function."

13. Section 4307 states, in pertinent part:

"(a) Any person who has been denied a license or whose license has been revoked or is under suspension, or who has failed to renew his or her license while it was under suspension, or who has been a manager, administrator, owner, member, officer, director, associate, or partner of any partnership, corporation, firm, or association whose application for a license has been denied or revoked, is under suspension or has been placed on probation, and while acting as the manager, administrator, owner, member, officer, director, associate, or partner had knowledge of or knowingly participated in any conduct for which the license was denied, revoked, suspended, or placed on probation, shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee as follows:

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(1) Where a probationary license is issued or where an existing license is placed on probation, this prohibition shall remain in effect for a period not to exceed five years.

(2) Where the license is denied or revoked, the prohibition shall continue until the license is issued or reinstated."

14. Health and Safety Code section 11153 states, in pertinent part:

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

15. Health and Safety Code section 11162.1 states:

"(a) The prescription forms for controlled substances shall be printed with the following features:

(1) A latent, repetitive "void" pattern shall be printed across the entire front of the prescription blank; if a prescription is scanned or photocopied, the word "void" shall appear in a pattern across the entire front of the prescription.

(2) A watermark shall be printed on the backside of the prescription blank; the watermark shall consist of the words "California Security Prescription."

(3) A chemical void protection that prevents alteration by chemical washing.

(4) A feature printed in thermochromic ink.

(5) An area of opaque writing so that the writing disappears if the prescription is lightened.

(6) A description of the security features included on each prescription form.

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(7)(A) Six quantity check off boxes shall be printed on the form so that the prescriber may indicate the quantity by checking the applicable box where the following quantities shall appear:

1-24

25-49

50-74

75-100

101-150

151 and over.

(B) In conjunction with the quantity boxes, a space shall be provided to designate the units referenced in the quantity boxes when the drug is not in tablet or capsule form.

(8) Prescription blanks shall contain a statement printed on the bottom of the prescription blank that the "Prescription is void if the number of drugs prescribed is not noted."

(9) The preprinted name, category of licensure, license number, federal controlled substance registration number, and address of the prescribing practitioner.

(10) Check boxes shall be printed on the form so that the prescriber may indicate the number of refills ordered.

(11) The date of origin of the prescription.

(12) A check box indicating the prescriber's order not to substitute.

(13) An identifying number assigned to the approved security printer by the Department of Justice.

(14)(A) A check box by the name of each prescriber when a prescription form lists multiple prescribers.

(B) Each prescriber who signs the prescription form shall identify himself or herself as the prescriber by checking the box by his or her name.

(15) A uniquely serialized number, in a manner prescribed by the Department of Justice.

(b) Each batch of controlled substance prescription forms shall have the lot number printed on the form and each form within that batch shall be numbered sequentially beginning with the numeral one.

. . ."

16. Health and Safety Code section 11164 states in pertinent part:

"Except as provided in Section 11167, no person shall prescribe a controlled substance, nor shall any person fill, compound, or dispense a prescription for a controlled substance, unless it complies with the requirements of this section.

(a) Each prescription for a controlled substance classified in Schedule II, III, IV, or V, except as authorized by subdivision (b), shall be made on a controlled substance prescription form as specified in Section 11162.1 . . . ."

REGULATORY PROVISIONS

17. California Code of Regulations, title 16, section 1761, states:

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

(b) Even after conferring with the prescriber, a pharmacist shall not compound or dispense a controlled substance prescription where the pharmacist knows or has objective reason to know that said prescription was not issued for a legitimate medical purpose."

CODE OF FEDERAL REGULATIONS

18. Code of Federal Regulations, Title 21, section 1306.04, subdivision (a), states:

"A prescription for a controlled substance to be effective must be issued for a legitimate medical purpose by an individual practitioner in the usual course of his professional practice. The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, but a corresponding responsibility rests with the pharmacist who fills the prescription. An order purporting to be a prescription issued not in the usual course of professional treatment or in legitimate and authorized research is not a prescription within the meaning and intent of section 309 of the Act (21 U.S.C. 829) and the person knowingly filling such a purported prescription as well as the person issuing it, shall be subject to the penalties provided for violations of the provisions of law relating to controlled substances."

COST RECOVERY

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

CONTROLLED SUBSTANCES/DANGEROUS DRUGS

20. Oxycodone 30 mg, under the brand name Roxicodone 30 mg, is a dangerous drug pursuant to Business and Professions Code section 4022 and a Schedule II controlled substance pursuant to Health and Safety Code section 11055, subdivision (b)(1)(M). It is used to treat pain.

21. Alprazolam 2 mg, under the brand name Xanax 2 mg, is a dangerous drug pursuant to Business and Professions Code section 4022 and a Schedule IV controlled substance pursuant to Health and Safety Code section 11057, subdivision (d)(1). It is used to treat anxiety.

22. Promethazine with codeine syrup, under the brand name Phenergan with Codeine Syrup, is a dangerous drug pursuant to Business and Professions Code section 4022 and a Schedule V controlled substance pursuant to Health and Safety Code section 11058, subdivision (c)(1). Promethazine with codeine syrup is a prescription cough syrup.

FACTUAL BACKGROUND

23. The Board analyzed Controlled Substance Utilization Review and Evaluation System (CURES) [1] data from Respondent Pharmacy and determined a need for an investigation to evaluate Respondent Pharmacy's controlled substance dispensing practices. The investigation determined Respondent Pharmacy and Respondent Tilton, while acting as pharmacist-in-charge, failed to fulfill their corresponding responsibility in dispensing prescriptions under the prescribing authority of Dr. Kevin M. Smith of Orange, California ("Dr. Smith").

24. The Board's investigation determined that between August 16, 2016 and June 30, 2017, Respondent Pharmacy dispensed 1,026 prescriptions under the prescribing authority of Dr.

[1] The Controlled Substance Utilization Review and Evaluation System (CURES) is California's Prescription Drug Monitoring Program (PDMP) which requires mandatory weekly reporting of dispensed Schedule II-IV (CII-IV) controlled substances prescriptions across the state. It can be used by healthcare professionals to evaluate and determine whether patients are utilizing controlled substances correctly.

Smith in the presence of numerous factors indicating the prescriptions were not written for legitimate medical purposes. Factors of irregularity related to Dr. Smith's prescriptions included the following:

a. Dr. Smith's prescriptions at Respondent Pharmacy included only three commonly abused controlled substances: oxycodone 30 mg, alprazolam 2 mg, and promethazine/codeine syrup.

b. Over 99% of Dr. Smith's prescriptions at Respondent Pharmacy were purchased in cash, without the aid of prescription insurance.

c. Many of Dr. Smith's patients paid a very high price, over $600, for 180 oxycodone 30 mg tablets.

d. Dr. Smith's office was located over 77 miles away from Respondent Pharmacy.

e. Dr. Smith exclusively prescribed the highest strength of immediate release oxycodone and alprazolam.

f. All of Dr. Smith's patients received at least one prescription for oxycodone 30 mg, alprazolam 2 mg, and promethazine/codeine syrup.

g. Respondent Pharmacy processed large numbers of Dr. Smith's prescriptions on the same days and frequently assigned Dr. Smith's prescriptions consecutive prescription numbers. Additionally, many of Dr. Smith's prescriptions were found filed consecutively in Respondent Pharmacy's prescription document files.

h. There were several instances when Dr. Smith prescribed multiple identical sets of prescriptions to a single patient in less than one month.

i. There were instances when Dr. Smith's patients obtained controlled substance prescriptions from Respondent Pharmacy when a previously dispensed supply of medication should not have been exhausted.

j. There were numerous instances when Respondent Pharmacy dispensed promethazine/codeine syrup prescriptions to patients of Dr. Smith more than one month after the prescriptions were written.

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k. At least 27 patients of Dr. Smith received prescriptions for promethazine/codeine syrup in four or more consecutive months, even though promethazine/codeine syrup is indicated for short term use.

l. The drug name codeine was misspelled as "codein" on Dr. Smith's prescriptions.

m. Dr. Smith's prescription documents did not conform to the requirements of Health and Safety Code section 11162.1 in that they lacked a lot number, a batch number, and a "California Security Prescription" watermark.

25. Despite these irregularities, there were no notations or documentation on the prescription documents indicating Respondent Tilton contacted Dr. Smith and attempted to validate the prescriptions or resolve any of the irregularities listed above.

FIRST CAUSE FOR DISCIPLINE

(Violation of Corresponding Responsibility)

26. Respondent Pharmacy and Respondent Tilton are subject to disciplinary action under Code section 4301, subdivisions (d), (j) and/or (o) and CCR, title 16, section 1761, subdivisions (a) and (b), in conjunction with Code sections 4036.5 and 4113, Health and Safety Code section 11153, subdivision (a) and Code of Federal Regulations Title 21, section 1306.04, subdivision (a), in that they violated their corresponding responsibility by excessively furnishing controlled substances and repeatedly failing to resolve irregularities and red flags of illegitimacy for controlled substances prescribed by Dr. Smith. Between August 16, 2016 and June 30, 2017, Respondent Tilton, while acting as pharmacist-in-charge, and Respondent Pharmacy dispensed 1,026 prescriptions under the prescribing authority of Dr. Smith in the presence of numerous objective factors indicating the prescriptions were not written for legitimate medical purposes. Complainant incorporates by reference paragraphs 23 through 25 as though fully set forth herein.

SECOND CAUSE FOR DISCIPLINE

(Failure to Comply with Requirements for Controlled Substance Prescriptions)

27. Respondent Pharmacy and Respondent Tilton are subject to disciplinary action under Code section 4301, subdivisions (d), (j) and/or (o) and CCR, title 16, section 1761, subdivisions (a) and (b), in conjunction with Code sections 4036.5 and 4113, Health and Safety Code sections

11164 and 11162.1, and Code of Federal Regulations Title 21, section 1306.04, subdivision (a), in that Respondent Pharmacy and Respondent Tilton, while acting as pharmacist-in-charge, dispensed at least 1,032 controlled substance prescriptions written on 344 prescription documents that did not conform to the requirements of Health and Safety Code section 11162.1 in that they lacked a lot number, a batch number, and a "California Security Prescription" watermark. Complainant incorporates by reference paragraphs 23 through 25 as though fully set forth herein.

OTHER MATTERS

34. Pursuant to section 4307, if discipline is imposed on Pharmacy Permit Number PHY 53859 to Tilton Nguyen Pharmaceutical Inc. doing business as Oasis Pharmacy, with Pauline Minh Tilton as the President, 100% shareholder, Director, Secretary and Treasurer/Chief Financial Officer, Tilton Nguyen Pharmaceutical Inc. shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 53859 is placed on probation or until Pharmacy Permit Number PHY 53859 is reinstated if the license is revoked.

35. Pursuant to section 4307, if discipline is imposed on Pharmacy Permit Number PHY 53859 issued to Tilton Nguyen Pharmaceutical Inc. doing business as Oasis Pharmacy, with Pauline Minh Tilton as the President, 100% shareholder, Director, Secretary and Treasurer/Chief Financial Officer, while Pauline Minh Tilton has been an officer or owner, and had knowledge of, or knowingly participated in, any conduct for which Tilton Nguyen Pharmaceutical Inc. was disciplined, Pauline Minh Tilton shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 53859 is placed on probation or until Pharmacy Permit Number PHY 53859 is reinstated if the license is revoked.

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PRAYER

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

1. Revoking or suspending Pharmacy Permit Number PHY 53859, issued to Tilton Nguyen Pharmaceutical Inc. doing business as Oasis Pharmacy;

2. Prohibiting Tilton Nguyen Pharmaceutical Inc. from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 53859 is placed on probation or until Pharmacy Permit Number PHY 53859 is reinstated if Pharmacy Permit Number PHY 53859 issued to Tilton Nguyen Pharmaceutical Inc., doing business as Oasis Pharmacy, is revoked;

3. Prohibiting Pauline Minh Tilton from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 53859 is placed on probation or until Pharmacy Permit Number PHY 53859 is reinstated if Pharmacy Permit Number PHY 53859 issued to Tilton Nguyen Pharmaceutical Inc., doing business as Oasis Pharmacy, is revoked;

4. Revoking or suspending Pharmacist License Number RPH 47537 to Pauline Minh Tilton;

5. Ordering Tilton Nguyen Pharmaceutical Inc., doing business as Oasis Pharmacy, and Pauline Minh Tilton 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; and

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

DATED: June 7, 2019

Anne Sodergren

ANNE SODERGREN
Interim Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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