

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

In the Matter of the Statement of Issues Against:

LAWRENCE JARDIN NUNES, Respondent

Pharmacist License Applicant

Agency Case No. 6639

OAH No. 2019120051

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective at 5:00 p.m. on December 9, 2020.

It is so ORDERED on November 9, 2020.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Greg Lippe", is written over the printed name.

By

Greg Lippe
Board President

1 XAVIER BECERRA
Attorney General of California
2 ARMANDO ZAMBRANO
Supervising Deputy Attorney General
3 STEPHANIE J. LEE
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Attorneys for Complainant
7

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

12 In the Matter of the Statement of Issues
Against:

13 **LAWRENCE JARDIN NUNES**

14 **Pharmacist License Applicant**

15 Respondent.
16
17

Case No. 6639

OAH No. 2019120051

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

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

20 **PARTIES**

21 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy
22 (Board). She brought this action solely in her official capacity and is represented in this matter by
23 Xavier Becerra, Attorney General of the State of California, by Stephanie J. Lee, Deputy
24 Attorney General.

25 2. Respondent Lawrence Jardin Nunes (Respondent) is represented in this proceeding by
26 attorney Adam B. Brown, whose address is: 3848 W. Carson Street, Suite 206, Torrance, CA
27 90503.

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1 3. On or about August 31, 2018, Respondent filed an application dated August 27, 2018,
2 with the Board to obtain a Pharmacist License. The Board denied the application on November
3 26, 2018.

4 **JURISDICTION**

5 4. Statement of Issues No. 6639 was filed before the Board, and is currently pending
6 against Respondent. The Statement of Issues and all other statutorily required documents were
7 properly served on Respondent on October 25, 2019.

8 5. A copy of Statement of Issues No. 6639 is attached as Exhibit A and incorporated
9 herein by reference.

10 **ADVISEMENT AND WAIVERS**

11 6. Respondent has carefully read, fully discussed with counsel, and understands the
12 charges and allegations in Statement of Issues No. 6639. Respondent has also carefully read,
13 fully discussed with counsel, and understands the effects of this Stipulated Settlement and
14 Disciplinary Order.

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

21 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
22 every right set forth above.

23 **CULPABILITY**

24 9. Respondent admits the truth of each and every charge and allegation in Statement of
25 Issues No. 6639.

26 10. Respondent agrees that his Pharmacist License is subject to denial and he agrees to be
27 bound by the Board's probationary terms as set forth in the Disciplinary Order below.

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CONTINGENCY

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

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

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

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

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DISCIPLINARY ORDER

IT IS HEREBY ORDERED that upon satisfaction of all statutory and regulatory requirements for issuance of a pharmacist license, a pharmacist license shall be issued to Respondent and immediately revoked; the order of revocation is stayed and Respondent is placed on probation for three (3) years upon the following terms and conditions:

1. Obey All Laws

Respondent shall obey all state and federal laws and regulations.

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

- an arrest or issuance of a criminal complaint for violation of any provision of the Pharmacy Law, state and federal food and drug laws, or state and federal controlled substances laws
- a plea of guilty, or nolo contendere, no contest, or similar, in any state or federal criminal proceeding to any criminal complaint, information or indictment
- a conviction of any crime
- the filing of a disciplinary pleading, issuance of a citation, or initiation of another administrative action filed by any state or federal agency which involves Respondent's license or which is related to the practice of pharmacy or the manufacturing, obtaining, handling, distributing, billing, or charging for any drug, device or controlled substance.

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

2. Report to the Board

Respondent shall report to the Board quarterly, on a schedule as directed by the Board or its designee. The report shall be made either in person or in writing, as directed. Among other requirements, Respondent shall state in each report under penalty of perjury whether there has been compliance with all the terms and conditions of probation.

Failure to submit timely reports in a form as directed shall be considered a violation of probation. Any period(s) of delinquency in submission of reports as directed may be added to the

1 total period of probation. Moreover, if the final probation report is not made as directed,
2 probation shall be automatically extended until such time as the final report is made and accepted
3 by the Board.

4 **3. Interview with the Board**

5 Upon receipt of reasonable prior notice, Respondent shall appear in person for interviews
6 with the Board or its designee, at such intervals and locations as are determined by the Board or
7 its designee. Failure to appear for any scheduled interview without prior notification to Board
8 staff, or failure to appear for two (2) or more scheduled interviews with the Board or its designee
9 during the period of probation, shall be considered a violation of probation.

10 **4. Cooperate with Board Staff**

11 Respondent shall timely cooperate with the Board's inspection program and with the
12 Board's monitoring and investigation of Respondent's compliance with the terms and conditions
13 of his probation, including but not limited to: timely responses to requests for information by
14 Board staff; timely compliance with directives from Board staff regarding requirements of any
15 term or condition of probation; and timely completion of documentation pertaining to a term or
16 condition of probation. Failure to timely cooperate shall be considered a violation of probation.

17 **5. Continuing Education**

18 Respondent shall provide evidence of efforts to maintain skill and knowledge as a
19 pharmacist as directed by the Board or its designee.

20 **6. Reporting of Employment and Notice to Employers**

21 During the period of probation, Respondent shall notify all present and prospective
22 employers of the decision in Case number 6639 and the terms, conditions and restrictions
23 imposed on Respondent by the decision, as follows:

24 Within thirty (30) days of the effective date of this decision, and within ten (10) days of
25 undertaking any new employment, Respondent shall report to the Board in writing the name,
26 physical address, and mailing address of each of his employer(s), and the name(s) and telephone
27 number(s) of all of his direct supervisor(s), as well as any pharmacist(s)-in-charge, designated
28 representative(s)-in-charge, responsible manager, or other compliance supervisor(s) and the work

1 schedule, if known. Respondent shall also include the reason(s) for leaving the prior
2 employment. Respondent shall sign and return to the Board a written consent authorizing the
3 Board or its designee to communicate with all of Respondent's employer(s) and supervisor(s),
4 and authorizing those employer(s) or supervisor(s) to communicate with the Board or its
5 designee, concerning Respondent's work status, performance, and monitoring. Failure to comply
6 with the requirements or deadlines of this condition shall be considered a violation of probation.

7 Within thirty (30) days of the effective date of this decision, and within fifteen (15) days of
8 Respondent undertaking any new employment, Respondent shall cause (a) his direct supervisor,
9 (b) his pharmacist-in-charge, designated representative-in-charge, responsible manager, or other
10 compliance supervisor, and (c) the owner or owner representative of his employer, to report to the
11 Board in writing acknowledging that the listed individual(s) has/have read the decision in Case
12 number 6639, and terms and conditions imposed thereby. If one person serves in more than one
13 role described in (a), (b), or (c), the acknowledgment shall so state. It shall be the Respondent's
14 responsibility to ensure that these acknowledgment(s) are timely submitted to the Board. In the
15 event of a change in the person(s) serving the role(s) described in (a), (b), or (c) during the term
16 of probation, Respondent shall cause the person(s) taking over the role(s) to report to the Board in
17 writing within fifteen (15) days of the change acknowledging that he or she has read the decision
18 in Case number 6639, and the terms and conditions imposed thereby.

19 If Respondent works for or is employed by or through an employment service, Respondent
20 must notify the person(s) described in (a), (b), and (c) above at every entity licensed by the Board
21 of the decision in Case number 6639, and the terms and conditions imposed thereby in advance of
22 Respondent commencing work at such licensed entity. A record of this notification must be
23 provided to the Board upon request.

24 Furthermore, within thirty (30) days of the effective date of this decision, and within fifteen
25 (15) days of Respondent undertaking any new employment by or through an employment service,
26 Respondent shall cause the person(s) described in (a), (b), and (c) above at the employment
27 service to report to the Board in writing acknowledging that he or she has read the decision in
28 Case number 6639, and the terms and conditions imposed thereby. It shall be Respondent's

responsibility to ensure that these acknowledgment(s) are timely submitted to the Board.

Failure to timely notify present or prospective employer(s) or failure to cause the identified person(s) with that/those employer(s) to submit timely written acknowledgments to the Board shall be considered a violation of probation.

"Employment" within the meaning of this provision includes any full-time, part-time, temporary, relief, or employment/management service position as a pharmacist, or any position for which a pharmacist is a requirement or criterion for employment, whether the Respondent is an employee, independent contractor or volunteer.

7. Notification of Change(s) in Name, Address(es), or Phone Number(s)

Respondent shall further notify the Board in writing within ten (10) days of any change in name, residence address, mailing address, e-mail address or phone number.

Failure to timely notify the Board of any change in employer, name, address, or phone number shall be considered a violation of probation.

8. Restrictions on Supervision and Oversight of Licensed Facilities

During the period of probation, Respondent shall not supervise any intern pharmacist, be the pharmacist-in-charge, designated representative-in-charge, responsible manager or other compliance supervisor of any entity licensed by the Board, nor serve as a consultant. Assumption of any such unauthorized supervision responsibilities shall be considered a violation of probation.

9. Probation Monitoring Costs

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

10. Status of License

Respondent shall, at all times while on probation, maintain an active, current Pharmacist License with the Board, including any period during which suspension or probation is tolled. Failure to maintain an active, current Pharmacist License shall be considered a violation of probation.

1 If Respondent's Pharmacist License expires or is cancelled by operation of law or otherwise
2 at any time during the period of probation, including any extensions thereof due to tolling or
3 otherwise, upon renewal or reapplication Respondent's license shall be subject to all terms and
4 conditions of this probation not previously satisfied.

5 **11. License Surrender While on Probation/Suspension**

6 Following the effective date of this decision, should Respondent cease practice due to
7 retirement or health, or be otherwise unable to satisfy the terms and conditions of probation,
8 Respondent may relinquish his license, including any indicia of licensure issued by the Board,
9 along with a request to surrender the license. The Board or its designee shall have the discretion
10 whether to accept the surrender or take any other action it deems appropriate and reasonable.
11 Upon formal acceptance of the surrender of the license, Respondent will no longer be subject to
12 the terms and conditions of probation. This surrender constitutes a record of discipline and shall
13 become a part of the Respondent's license history with the Board.

14 Upon acceptance of the surrender, Respondent shall relinquish his pocket and/or wall
15 license, including any indicia of licensure not previously provided to the Board within ten (10)
16 days of notification by the Board that the surrender is accepted if not already provided.
17 Respondent may not reapply for any license from the Board for three (3) years from the effective
18 date of the surrender. Respondent shall meet all requirements applicable to the license sought as
19 of the date the application for that license is submitted to the Board, including any outstanding
20 costs.

21 **12. Practice Requirement – Extension of Probation**

22 Except during periods of suspension, Respondent shall, at all times while on probation, be
23 employed as a pharmacist in California for a minimum of eighty (80) hours per calendar month.
24 Any month during which this minimum is not met shall extend the period of probation by one
25 month. During any such period of insufficient employment, Respondent must nonetheless
26 comply with all terms and conditions of probation, unless Respondent receives a waiver in
27 writing from the Board or its designee.

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1 If Respondent does not practice as a pharmacist in California for the minimum number of
2 hours in any calendar month, for any reason (including vacation), Respondent shall notify the
3 Board in writing within ten (10) days of the conclusion of that calendar month. This notification
4 shall include at least: the date(s), location(s), and hours of last practice; the reason(s) for the
5 interruption or reduction in practice; and the anticipated date(s) on which Respondent will resume
6 practice at the required level. Respondent shall further notify the Board in writing within ten (10)
7 days following the next calendar month during which Respondent practices as a pharmacist in
8 California for the minimum of hours. Any failure to timely provide such notification(s) shall be
9 considered a violation of probation.

10 It is a violation of probation for Respondent's probation to be extended pursuant to the
11 provisions of this condition for a total period, counting consecutive and non-consecutive months,
12 exceeding thirty-six (36) months. The Board or its designee may post a notice of the extended
13 probation period on its website.

14 **13. Violation of Probation**

15 If Respondent has not complied with any term or condition of probation, the Board shall
16 have continuing jurisdiction over Respondent, and the Board shall provide notice to Respondent
17 that probation shall automatically be extended, until all terms and conditions have been satisfied
18 or the Board has taken other action as deemed appropriate to treat the failure to comply as a
19 violation of probation, to terminate probation, and to impose the penalty that was stayed. The
20 Board or its designee may post a notice of the extended probation period on its website.

21 If Respondent violates probation in any respect, the Board, after giving Respondent notice
22 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that
23 was stayed. If a petition to revoke probation or an accusation is filed against Respondent during
24 probation, or the preparation of an accusation or petition to revoke probation is requested from
25 the Office of the Attorney General, the Board shall have continuing jurisdiction and the period of
26 probation shall be automatically extended until the petition to revoke probation or accusation is
27 heard and decided.

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1 **14. Completion of Probation**

2 Upon written notice by the Board or its designee indicating successful completion of
3 probation, Respondent's license will be fully restored.

4 **15. Ethics Course**

5 Within sixty (60) calendar days of the effective date of this decision, Respondent shall
6 enroll in a course in ethics, at Respondent's expense, approved in advance by the Board or its
7 designee that complies with Title 16 California Code of Regulations section 1773.5. Respondent
8 shall provide proof of enrollment upon request. Within five (5) days of completion, Respondent
9 shall submit a copy of the certificate of completion to the Board or its designee. Failure to timely
10 enroll in an approved ethics course, to initiate the course during the first year of probation, to
11 successfully complete it before the end of the second year of probation, or to timely submit proof
12 of completion to the Board or its designee, shall be considered a violation of probation.

13 **16. No Ownership or Management of Licensed Premises**

14 Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager,
15 administrator, member, officer, director, trustee, associate, or partner of any business, firm,
16 partnership, or corporation currently or hereinafter licensed by the Board. Respondent shall sell
17 or transfer any legal or beneficial interest in any entity licensed by the Board within ninety (90)
18 days following the effective date of this decision and shall immediately thereafter provide written
19 proof thereof to the Board. Failure to timely divest any legal or beneficial interest(s) or provide
20 documentation thereof shall be considered a violation of probation.

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DATED:

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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Adam B. Brown. I understand the stipulation and the effect it will have on my Pharmacist License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

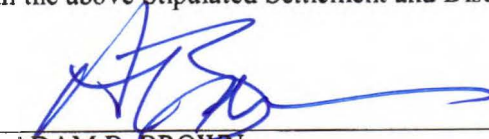
DATED: 9/21/2020



LAWRENCE JARDIN NUNES
Respondent

I have read and fully discussed with Respondent Lawrence Jardin Nunes the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 9-21-20



ADAM B. BROWN
Attorney for Respondent

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ENDORSEMENT

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

DATED: _____

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
ARMANDO ZAMBRANO
Supervising Deputy Attorney General

STEPHANIE J. LEE
Deputy Attorney General
Attorneys for Complainant

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ENDORSEMENT

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

DATED: 9/22/2020

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
ARMANDO ZAMBRANO
Supervising Deputy Attorney General



STEPHANIE J. LEE
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Statement of Issues No. 6639

1 XAVIER BECERRA
Attorney General of California
2 ARMANDO ZAMBRANO
Supervising Deputy Attorney General
3 STEPHANIE J. LEE
Deputy Attorney General
4 State Bar No. 279733
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
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6 Facsimile: (213) 897-2804
Attorneys for Complainant
7

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

12 In the Matter of the Statement of Issues
13 Against:

Case No. 6639

14 **LAWRENCE JARDIN NUNES**
15 **Pharmacist License Applicant**

STATEMENT OF ISSUES

16 Respondent.
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18 **PARTIES**

19 1. Anne Sodergren (Complainant) brings this Statement of Issues solely in her official
20 capacity as the Interim Executive Officer of the Board of Pharmacy (Board), Department of
21 Consumer Affairs.

22 2. On or about August 31, 2018, the Board of Pharmacy, Department of Consumer
23 Affairs received an application for a/an Pharmacist License from Lawrence Jardin Nunes
24 (Respondent). On or about August 27, 2018, Respondent certified under penalty of perjury to the
25 truthfulness of all statements, answers, and representations in the application. The Board denied
26 the application on November 26, 2018.

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1 **JURISDICTION**

2 3. This Statement of Issues is brought before the Board under the authority of the
3 following laws. All section references are to the Business and Professions Code (Code) unless
4 otherwise indicated.

5 **STATUTORY PROVISIONS**

6 4. Section 123 of the Code states, in pertinent part:

7 It is a misdemeanor for any person to engage in any conduct which subverts or
8 attempts to subvert any licensing examination or the administration of an examination,
including, but not limited to:

9 (a) Conduct which violates the security of the examination materials; removing
10 from the examination room any examination materials without authorization; the
11 unauthorized reproduction by any means of any portion of the actual licensing examination;
12 aiding by any means the unauthorized reproduction of any portion of the actual licensing
13 examination; paying or using professional or paid examination-takers for the purpose of
14 reconstructing any portion of the licensing examination; obtaining examination questions or
15 other examination material, except by specific authorization either before, during, or after
16 an examination; or using or purporting to use any examination questions or materials which
were improperly removed or taken from any examination for the purpose of instructing or
preparing any applicant for examination; or selling, distributing, buying, receiving, or
having unauthorized possession of any portion of a future, current, or previously
administered licensing examination.

17 5. Section 480 of the Code states, in pertinent part:

18 (a) A board may deny a license regulated by this code on the grounds that
19 the applicant has one of the following:

20 . . .

21 (2) Done any act involving dishonesty, fraud, or deceit with the
22 intent to substantially benefit himself or herself or another, or substantially
injure another.

23 (3)(A) Done any act that if done by a licentiate of the business or
24 profession in question, would be grounds for suspension or revocation of
license.

25 (B) The board may deny a license pursuant to this subdivision
26 only if the crime or act is substantially related to the qualifications,
27 functions, or duties of the business or profession for which application is
28 made.

6. Section 496 of the Code states: “A board may deny, suspend, revoke, or otherwise restrict a license on the ground that an applicant or licensee has violated Section 123 pertaining to the subversion of licensing examinations.”

7. Section 4301 of the Code states, 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:

• • •

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

REGULATORY PROVISIONS

8. California Code of Regulations, title 16, section 1770, states:

For the purpose of denial, suspension, or revocation of a personal or facility license pursuant to Division 1.5 (commencing with Section 475) of the Business and Professions Code, a crime or act shall be considered substantially related to the qualifications, functions or duties of a licensee or registrant if to a substantial degree it evidences present or potential unfitness of a licensee or registrant to perform the functions authorized by his license or registration in a manner consistent with the public health, safety, or welfare.

9. California Code of Regulations, title 16, section 1723.1, states:

Examination questions are confidential. Any applicant for any license issued by the board who removes all or part of any qualifying examination from the examination room or area, or who conveys or exposes all or part of any qualifying examination to any other person may be disqualified as a candidate for a license. The applicant shall not be approved to take the examination for three years from the date of the incident and shall surrender his or her intern license until again eligible to take the examination. The applicant may not be issued a pharmacy technician license until the applicant is again eligible to take the examination.

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1 **SECOND CAUSE FOR DENIAL OF APPLICATION**

2 **(Acts Warranting Suspension or Revocation of Licensure)**

3 16. Respondent's application is subject to denial under Code sections 480(a)(3)(A) and
4 4301(f), in conjunction with California Code of Regulations title 16, section 1770, in that
5 Respondent committed acts which if done by a licensed pharmacist, would be grounds for
6 suspension or revocation of his license. Specifically, Respondent committed acts involving moral
7 turpitude, dishonest, fraud, deceit, or corruption. Complainant refers to and by this reference
8 incorporates the allegations set forth above in paragraphs 10 through 14, as though set forth fully
9 herein.

10 **THIRD CAUSE FOR DENIAL OF APPLICATION**

11 **(Examination Subversion)**

12 17. Respondent's application is subject to denial under Code section 496 and 123, in
13 conjunction with California Code of Regulations title 16, section 1723.1, in that Respondent
14 subverted or attempted to subvert a licensing examination or the administration of an
15 examination. Complainant refers to and by this reference incorporates the allegations set forth
16 above in paragraphs 10 through 14, as though set forth fully herein.

17 **PRAYER**

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

- 20 1. Denying the application of Lawrence Jardin Nunes for a Pharmacist License;
21 2. Taking such other and further action as deemed necessary and proper.

22
23 DATED: October 18, 2019



24 ANNE SODERGREN
25 Interim Executive Officer
26 Board of Pharmacy
27 Department of Consumer Affairs
28 State of California
 Complainant

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