

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

In the Matter of the Accusation Against:

**WOODLAND HILLS RX PHARMACY CORP. DBA WOODLAND HILLS
RX PHARMACY,
SHAHAB SAJADI AKA SHAHABODDIN SAJADI, CEO/PRES,
KAMBIZ AHADI AKA KAMBIZ AHADIMOGHADDAM, SECRETARY,**

Pharmacy Permit No. PHY 55843;

SHAHAB SAJADI,

Pharmacist License No. RPH 72295;

and

KAMBIZ AHADI,

Pharmacist License No. RPH 72851

Respondents.

Agency Case No. 6989

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 August 4, 2022.

It is so ORDERED on July 5, 2022.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By

A handwritten signature in black ink, appearing to read "Seung W. Oh". The signature is fluid and cursive, with the first name "Seung" and last name "Oh" being clearly legible.

Seung W. Oh, Pharm.D.
Board President

1 ROB BONTA
Attorney General of California
2 NANCY A. KAISER
Supervising Deputy Attorney General
3 LANGSTON M. EDWARDS
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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 Accusation Against:

13 **WOODLAND HILLS RX PHARMACY**
14 **CORP. DBA WOODLAND HILLS RX**
15 **PHARMACY, SHAHAB SAJADI AKA**
16 **SHAHABODDIN SAJADI, CEO/PRES**
17 **KAMBIZ AHADI AKA KAMBIZ**
18 **AHADIMOGHADDAM, SECRETARY**
19 **20011 Ventura Boulevard, Suite 1006**
20 **Woodland Hills, CA 91364**

21 **Pharmacy Permit No. PHY 55843,**

22 **SHAHAB SAJADI**
23 **7406 Jason Avenue**
24 **West Hills, CA 91307**

25 **Pharmacist License No. RPH 72295,**

26 **and**

27 **KAMBIZ AHADI**
28 **2211 W. Magnolia Blvd. #115**
Burbank, CA 91506

Pharmacist License No. RPH 72851

Respondents.

Case No. 6989

OAH No. 2021070470

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER AS TO
SHAHAB SAJADI

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

3 **PARTIES**

4 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy
5 (Board). She brought this action solely in her official capacity and is represented in this matter by
6 Rob Bonta, Attorney General of the State of California, by Langston M. Edwards, Deputy
7 Attorney General.

8 2. Woodland Hills Rx Pharmacy Corp. dba Woodland Hills Rx Pharmacy (Respondent
9 Woodland Hills), Shahab Sajadi aka Shahaboddin Sajadi (Respondent Sajadi), CEO/President
10 and Kambiz Ahadi aka Kambiz Ahadimoghaddam, Secretary (Respondent Kambiz) are
11 represented in this proceeding by Armond Marcarian, whose address is: 21650 Oxnard Street,
12 Suite 1980, Woodland Hills, CA 91367-7853.

13 3. On or about November 3, 2017, the Board of Pharmacy issued Pharmacy Permit
14 Number PHY 55843 to Woodland Hills Rx Pharmacy Corp. dba Woodland Hills Rx Pharmacy,
15 Shahab Sajadi aka Shahaboddin Sajadi, CEO/Pres, 50% Shareholder and Kambiz
16 Ahadimoghaddam aka Kambiz Ahadi, Secretary, 50% Shareholder, Treasurer/CEO and Director.
17 The Pharmacy Permit was in full force and effect at all times relevant to the charges brought in
18 Accusation No. 6989 and expired on April 1, 2022, pursuant to Discontinuance of Business.

19 4. On or about March 3, 2015, the Board of Pharmacy issued Pharmacist License
20 Number RPH 72295 to Shahab Sajadi (Respondent or Respondent Sajadi). The Pharmacist
21 License was in full force and effect at all times relevant to the charges brought in Accusation No.
22 6989 and will expire on September 30, 2022, unless renewed.

23 5. On or about July 29, 2015, the Board of Pharmacy issued Pharmacist License
24 Number RPH 72851 to Kambiz Ahadimoghaddam (Respondent Kambiz). The Pharmacist
25 License was in full force and effect at all times relevant to the charges brought in Accusation No.
26 6989 and will expire on September 30, 2024, unless renewed.

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1 **JURISDICTION**

2 1. Accusation No. 6989 was filed before the Board, and is currently pending against
3 Respondent. The Accusation and all other statutorily required documents were properly served
4 on Respondent on March 18, 2021. Respondent timely filed a Notice of Defense contesting the
5 Accusation.

6 2. A copy of Accusation No. 6989 is attached as exhibit A and incorporated in
7 Accusation No. 6989 by reference.

8 **ADVISEMENT AND WAIVERS**

9 3. Respondent has carefully read, fully discussed with counsel, and understands the
10 charges and allegations in Accusation No. 6989. Respondent has also carefully read, fully
11 discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary
12 Order.

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

19 5. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
20 every right set forth above.

21 **CULPABILITY**

22 6. Respondent understands and agrees that the charges and allegations in Accusation
23 No. 6989, if proven at a hearing, constitute cause for imposing discipline upon his Original
24 Pharmacist License.

25 7. For the purpose of resolving the Accusation without the expense and uncertainty of
26 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
27 basis for the charges in the Accusation, and that Respondent hereby gives up his right to contest
28 those charges.

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

CONTINGENCY

9. 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.

10. 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.

11. 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.

12. 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 Pharmacist License No. RPH 72295 issued to Respondent Shahab Sajadi is revoked. However, the revocation is stayed and Respondent is placed on probation for five (5) years on 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 total period of probation. Moreover, if the final probation report is not made as directed,

1 probation shall be automatically extended until such time as the final report is made and accepted
2 by the board.

3 **3. Interview with the Board**

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

9 **4. Cooperate with Board Staff**

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

16 **5. Continuing Education**

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

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

20 During the period of probation, respondent shall notify all present and prospective
21 employers of the decision in case number 6989 and the terms, conditions and restrictions imposed
22 on respondent by the decision, as follows:

23 Within thirty (30) days of the effective date of this decision, and within ten (10) days of
24 undertaking any new employment, respondent shall report to the board in writing the name,
25 physical address, and mailing address of each of employer(s), and the name(s) and telephone
26 number(s) of all of direct supervisor(s), as well as any pharmacist(s)-in-charge, designated
27 representative(s)-in-charge, responsible manager, or other compliance supervisor(s) and the work
28 schedule, if known. Respondent shall also include the reason(s) for leaving the prior

1 employment. Respondent shall sign and return to the board a written consent authorizing the
2 board or its designee to communicate with all of respondent's employer(s) and supervisor(s), and
3 authorizing those employer(s) or supervisor(s) to communicate with the board or its designee,
4 concerning respondent's work status, performance, and monitoring. Failure to comply with the
5 requirements or deadlines of this condition shall be considered a violation of probation.

6 Within thirty (30) days of the effective date of this decision, and within fifteen (15) days of
7 respondent undertaking any new employment, respondent shall cause (a) direct supervisor, (b)
8 pharmacist-in-charge, designated representative-in-charge, responsible manager, or other
9 compliance supervisor, and (c) the owner or owner representative of employer, to report to the
10 board in writing acknowledging that the listed individual(s) has read the decision in case number
11 6989, and terms and conditions imposed thereby. If one person serves in more than one role
12 described in (a), (b), or (c), the acknowledgment shall so state. It shall be the respondent's
13 responsibility to ensure that these acknowledgment(s) are timely submitted to the board. In the
14 event of a change in the person(s) serving the role(s) described in (a), (b), or (c) during the term
15 of probation, respondent shall cause the person(s) taking over the role(s) to report to the board in
16 writing within fifteen (15) days of the change acknowledging that he or she has read the decision
17 in case number 6989, and the terms and conditions imposed thereby.

18 If respondent works for or is employed by or through an employment service, respondent
19 must notify the person(s) described in (a), (b), and (c) above at every entity licensed by the board
20 of the decision in case number 6989, and the terms and conditions imposed thereby in advance of
21 respondent commencing work at such licensed entity. A record of this notification must be
22 provided to the board upon request.

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

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

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

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

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

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

13 **8. Restrictions on Supervision and Oversight of Licensed Facilities**

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

18 **9. Reimbursement of Board Costs**

19 As a condition precedent to successful completion of probation, respondent shall pay to the
20 board its costs of investigation and prosecution in the amount of \$5,000.00. Respondent shall be
21 permitted to pay these costs in a payment plan approved by the board or its designee, so long as
22 full payment is completed no later than one (1) year prior to the end date of probation. There shall
23 be no deviation from this schedule absent prior written approval by the board or its designee.
24 Failure to pay costs by the deadline(s) as directed shall be considered a violation of probation.

25 **10. Probation Monitoring Costs**

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

3 **11. Status of License**

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

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

12 **12. License Surrender While on Probation/Suspension**

13 Following the effective date of this decision, should respondent cease practice due to
14 retirement or health, or be otherwise unable to satisfy the terms and conditions of probation,
15 respondent may relinquish his Original Pharmacist License, including any indicia of licensure
16 issued by the board, along with a request to surrender the license. The board or its designee shall
17 have the discretion whether to accept the surrender or take any other action it deems appropriate
18 and reasonable. Upon formal acceptance of the surrender of the license, respondent will no
19 longer be subject to the terms and conditions of probation. This surrender constitutes a record of
20 discipline and shall become a part of the respondent's license history with the board.

21 Upon acceptance of the surrender, respondent shall relinquish pocket and/or wall license,
22 including any indicia of licensure not previously provided to the board within ten (10) days of
23 notification by the board that the surrender is accepted if not already provided. Respondent may
24 not reapply for any license from the board for three (3) years from the effective date of the
25 surrender. Respondent shall meet all requirements applicable to the license sought as of the date
26 the application for that license is submitted to the board, including any outstanding costs.

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13. Practice Requirement – Extension of Probation

Except during periods of suspension, respondent shall, at all times while on probation, be employed as a Registered Pharmacist in California for a minimum of 100 hours per calendar month. Any month during which this minimum is not met shall extend the period of probation by one month. During any such period of insufficient employment, respondent must nonetheless comply with all terms and conditions of probation, unless respondent receives a waiver in writing from the board or its designee.

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

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

14. Violation of Probation

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

1 If respondent violates probation in any respect, the board, after giving respondent notice
2 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that
3 was stayed. If a petition to revoke probation or an accusation is filed against respondent during
4 probation, or the preparation of an accusation or petition to revoke probation is requested from
5 the Office of the Attorney General, the board shall have continuing jurisdiction and the period of
6 probation shall be automatically extended until the petition to revoke probation or accusation is
7 heard and decided, and the charges and allegations in Accusation No. 6989 shall be deemed true
8 and correct.

9 **15. Completion of Probation**

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

12 **16. Remedial Education**

13 Within 60 days of the effective date of this decision, respondent shall submit to the board or
14 its designee, for prior approval, an appropriate program of remedial education related to
15 prescription drug abuse / corresponding responsibility. The program of remedial education shall
16 consist of at least 10 hours per year (50% in-person or live webinar), which shall be completed by
17 the end of each year of probation at respondent's own expense. Respondent must also complete
18 the Board's PDA training within the first year of probation. All remedial education shall be in
19 addition to, and shall not be credited toward, continuing education (CE) courses used for license
20 renewal purposes for pharmacists.

21 Failure to timely submit for approval or complete the approved remedial education shall be
22 considered a violation of probation. The period of probation will be automatically extended until
23 such remedial education is successfully completed and written proof, in a form acceptable to the
24 board, is provided to the board or its designee.

25 Following the completion of each course, the board or its designee may require the
26 respondent, at his own expense, to take an approved examination to test the respondent's
27 knowledge of the course. If the respondent does not achieve a passing score on the examination
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that course shall not count towards satisfaction of this term. Respondent shall take another course approved by the board in the same subject area.

17. No Ownership or Management of Licensed Premises

Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager, administrator, member, officer, director, trustee, associate, or partner of any business, firm, partnership, or corporation currently or in Accusation No. 6989 after licensed by the board. Respondent shall sell or transfer any legal or beneficial interest in any entity licensed by the board within ninety (90) days following the effective date of this decision and shall immediately thereafter provide written proof thereof to the board. Failure to timely divest any legal or beneficial interest(s) or provide documentation thereof shall be considered a violation of probation.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Armond Marcarian. I understand the stipulation and the effect it will have on my Original 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: _____

SHAHAB SAJADI
Respondent

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

DATED: _____

ARMOND MARCARIAN
Attorney for Respondent

1 that course shall not count towards satisfaction of this term. Respondent shall take another course
2 approved by the board in the same subject area.

3 **17. No Ownership or Management of Licensed Premises**

4 Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager,
5 administrator, member, officer, director, trustee, associate, or partner of any business, firm,
6 partnership, or corporation currently or in Accusation No. 6989 after licensed by the board.
7 Respondent shall sell or transfer any legal or beneficial interest in any entity licensed by the board
8 within ninety (90) days following the effective date of this decision and shall immediately
9 thereafter provide written proof thereof to the board. Failure to timely divest any legal or
10 beneficial interest(s) or provide documentation thereof shall be considered a violation of
11 probation.

12 **ACCEPTANCE**

13 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
14 discussed it with my attorney, Armond Marcarian. I understand the stipulation and the effect it
15 will have on my Original Pharmacist License. I enter into this Stipulated Settlement and
16 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
17 Decision and Order of the Board of Pharmacy.

18
19 DATED: 04/15/2022

20 SHAHAB SAJADI
21 *Respondent*

22 I have read and fully discussed with Respondent Shahab Sajadi the terms and conditions
23 and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve
24 its form and content.

25 DATED: April 15, 2022

26 Armond Marcarian
27 *ARMOND MARCARIAN*
28 *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,

ROB BONTA
Attorney General of California
NANCY A. KAISER
Supervising Deputy Attorney General

LANGSTON M. EDWARDS
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: April 15, 2022

Respectfully submitted,

ROB BONTA
Attorney General of California
NANCY A. KAISER
Supervising Deputy Attorney General

Langston M. Edwards

LANGSTON M. EDWARDS
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 6989

XAVIER BECERRA
Attorney General of California
ARMANDO ZAMBRANO
Supervising Deputy Attorney General
LANGSTON M. EDWARDS
Deputy Attorney General
State Bar No. 237926
300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 269-6371
Facsimile: (213) 897-2804
Attorneys for Complainant

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

In the Matter of the Accusation Against:

Case No. 6989

**WOODLAND HILLS RX PHARMACY
CORP. DBA WOODLAND HILLS RX
PHARMACY, SHAHAB SAJADI AKA
SHAHABODDIN SAJADI, CEO/PRES
KAMBIZ AHADI AKA KAMBIZ
AHADIMOGHADDAM, SECRETARY
20011 Ventura Boulevard, Suite 1006
Woodland Hills, CA 91364**

ACCUSATION

Pharmacy Permit No. PHY 55843,

**SHAHAB SAJADI
7406 Jason Avenue
West Hills, CA 91307**

Pharmacist License No. RPH 72295,

and

**KAMBIZ AHADI
2211 W. Magnolia Blvd. #115
Burbank, CA 91506**

Pharmacist License No. RPH 72851

Respondents.

1 **PARTIES**

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

4 2. On or about November 3, 2017, the Board of Pharmacy issued Pharmacy Permit
5 Number PHY 55843 to Woodland Hills Rx Pharmacy Corp. dba Woodland Hills Rx Pharmacy,
6 Shahab Sajadi aka Shahaboddin Sajadi, CEO/Pres, Kambiz Ahadimoghaddam aka Kambiz
7 Ahadi, Secretary (Respondent Woodland Hills). The Pharmacy Permit was in full force and
8 effect at all times relevant to the charges brought herein and will expire on November 1, 2021,
9 unless renewed.

10 3. On or about March 3, 2015, the Board of Pharmacy issued Pharmacist License
11 Number RPH 72295 to Shahab Sajadi (Respondent Sajadi). The Pharmacist License was in full
12 force and effect at all times relevant to the charges brought herein and will expire on May 31,
13 2022, unless renewed.

14 4. On or about July 29, 2015, the Board of Pharmacy issued Pharmacist License
15 Number RPH 72851 to Kambiz Ahadimoghaddam (Respondent Kambiz). The Pharmacist
16 License was in full force and effect at all times relevant to the charges brought herein and will
17 expire on September 30, 2022, unless renewed.

18
19 **JURISDICTION**

20 5. Section 118, subdivision (b), of the Code provides that the suspension/expiration/
21 surrender/cancellation of a license shall not deprive the Board/Registrar/Director of jurisdiction to
22 proceed with a disciplinary action during the period within which the license may be renewed,
23 restored, reissued or reinstated.

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

27 6. Section 4300 of the Code states:

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

1 (b) The board shall discipline the holder of any license issued by the board,
2 whose default has been entered or whose case has been heard by the board and found
3 guilty, by any of the following methods:

4 (1) Suspending judgment.

5 (2) Placing him or her upon probation.

6 (3) Suspending his or her right to practice for a period not exceeding one year.

7 (4) Revoking his or her license.

8 (5) Taking any other action in relation to disciplining him or her as the board in
9 its discretion may deem proper.

10 7. Section 4307, subdivision (a), of the Code states:

11 (a) Any person who has been denied a license or whose license has been
12 revoked or is under suspension, or who has failed to renew his or her license
13 while it was under suspension, or who has been a manager, administrator, owner,
14 member, officer, director, associate, partner, or any other person with
15 management or control of any partnership, corporation, trust, firm, or association
16 whose application for a license has been denied or revoked, is under suspension or
17 has been placed on probation, and while acting as the manager, administrator,
18 owner, member, officer, director, associate, partner, or any other person with
19 management or control had knowledge of or knowingly participated in any
20 conduct for which the license was denied, revoked, suspended, or placed on
21 probation, shall be prohibited from serving as a manager, administrator, owner,
22 member, officer, director, associate, partner, or in any other position with
23 management or control of a licensee as follows:

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

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

(b) Manager, administrator, owner, member, officer, director, associate,
partner, or any other person with management or control of a license as used in
this section and Section 4308, may refer to a pharmacist or to any other person
who serves in such capacity in or for a licensee.

(c) The provisions of subdivision (a) may be alleged in any pleading filed
pursuant to Chapter 5 (commencing with Section 11500) of Part 1 of Division 3
of the Government Code. However, no order may be issued in that case except as
to a person who is named in the caption, as to whom the pleading alleges the
applicability of this section, and where the person has been given notice of the
proceeding as required by Chapter 5 (commencing with Section 11500) of Part 1
of Division 3 of the Government Code. The authority to proceed as provided by
this subdivision shall be in addition to the board's authority to proceed under

Section 4339 or any other provision of law.”

STATUTORY PROVISIONS

8. Section 4070 subdivision (a) of the Code states, in pertinent part, that except as provided in Section 4019 and subdivision (b), an oral or an electronic data transmission prescription as defined in subdivision (c) of Section 4040 shall as soon as practicable be reduced to writing by the pharmacist and shall be filled by, or under the direction of, the pharmacist. The pharmacist need not reduce to writing the address, telephone number, license classification, federal registry number of the prescriber or the address of the patient or patients if the information is readily retrievable in the pharmacy.

9. Section 4040 subdivision (c) of the Codes states in pertinent part that “electronic transmission prescription” includes both image and data prescriptions. “Electronic image transmission prescription” means any prescription order for which a facsimile of the order is received by a pharmacy from a licensed prescriber. “Electronic data transmission prescription” means any prescription order, other than an electronic image transmission prescription, that is electronically transmitted from a licensed prescriber to a pharmacy.

10. Section 4301 of the Code states:

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:

...

(c) Gross negligence.

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

11. Section 4306.5 of the Code states, in pertinent part:

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.

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

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

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

11 12. Section 11152 of the Health and Safety Code states, “[n]o person shall write, issue,
12 fill, compound, or dispense a prescription that does not conform to this division.”

13 13. Section 11153 of the Health and Safety Code states, in pertinent part:

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

26 14. Section 11162.1 of the Health and Safety Code states, in pertinent part:¹

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

(1) The 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.

¹ Effective March 11, 2019, Health and Safety Code section 11162.1 was amended. The
language stated in this Accusation was in effect at all times relevant to the charges brought herein.

1 (4) A feature printed in thermochromic ink.

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

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

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

7 1–24

8 25–49

9 50–74

10 75–100

11 101–150

12 151 and over.

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

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

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

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

21 (11) The date of origin of the prescription.

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

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

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

26 (B) Each prescriber who signs the prescription form shall identify themselves as
27 the prescriber by checking the box by the prescriber’s name.

1 (15) A uniquely serialized number, in a manner prescribed by the Department of
Justice in accordance with Section 11162.2.

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

5 15. Section 11164 of the Health and Safety Code states, in pertinent part:²

6 [N]o person shall prescribe a controlled substance, nor shall any person fill,
7 compound, or dispense a prescription for a controlled substance, unless it complies
with the requirements of this section.

8 (a) Each prescription for a controlled substance classified in Schedule II, III, IV, or
9 V, except as authorized by subdivision (b), shall be made on a controlled substance
10 prescription form as specified in Section 11162.1 and shall meet the following
requirements:

11 (1) The prescription shall be signed and dated by the prescriber in ink and shall
12 contain the prescriber's address and telephone number; the name of the ultimate
13 user or research subject, or contact information as determined by the Secretary of
14 the United States Department of Health and Human Services; refill information,
15 such as the number of refills ordered and whether the prescription is a first-time
request or a refill; and the name, quantity, strength, and directions for use of the
controlled substance prescribed.

16 **REGULATORY PROVISIONS**

17 16. California Code of Regulations, Title 16, section 1716 states that pharmacists shall
18 not deviate from the requirements of a prescription except upon the prior consent of the prescriber
19 or to select the drug product in accordance with Section 4073 of the Business and Professions
20 Code. Nothing in this regulation is intended to prohibit a pharmacist from exercising commonly
21 accepted pharmaceutical practice in the compounding or dispensing of a prescription.

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

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

27 _____
28 ² Effective March 11, 2019, Health and Safety Code section 11164 was amended. The
language stated in this Accusation was in effect at all times relevant to the charges brought herein.

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

4 18. Code of Federal Regulations, Title 21, Part 1306, Section 04 (21 CFR 1306.04)
5 states:

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

14 **COST RECOVERY**

15 19. Business and Professions Code section 125.3 provides, in pertinent part, that the
16 Board may request the administrative law judge to direct a licentiate found to have committed a
17 violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the
18 investigation and enforcement of the case, with failure of the licentiate to comply subjecting the
19 license to not being renewed or reinstated. If a case settles, recovery of investigation and
20 enforcement costs may be included in a stipulated settlement.

22 **CONTROLLED SUBSTANCES**

23 20. Alprazolam is a Schedule IV controlled substance pursuant to Health and Safety Code
24 section 11057(d)(1) and a dangerous drug pursuant to Code section 4022, and is sold under the
25 brand name Xanax.

26 21. Hydrocodone/acetaminophen (APAP) is a Schedule II controlled substance as
27 designated by Code of Federal Regulations, title 21, section 1308.12, subdivision (b)(1)(vi),
28

1 Health and Safety Code section 11055(I)(i), a dangerous drug pursuant to Code section 4022, and
2 is sold under the brand name Norco.

3 22. Oxycodone is a Schedule II controlled substance as designated by Health and Safety
4 Code section 11055, subdivision (b)(1)(M), and is sold under the brand name
5 Percolone/Roxicodone.

6 23. Promethazine/Codeine syrup is a Schedule V controlled substance as designated by
7 Health and Safety Code section 11058, subdivision (c)(1), and is sold under the brand name
8 Phenergan with Codeine Syrup.

9 24. Section 4022 of the Code states:

10 “Dangerous drug” or “dangerous device” means any drug or device unsafe for self-
11 use in humans or animals, and includes the following:

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

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

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

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Woodland Hills Rx Pharmacy

FIRST CAUSE FOR DISCIPLINE

(Deviation from Prescription)

25. Respondent Woodland Hills Rx Pharmacy (Respondent Woodland Hills) is subject to disciplinary action under Cal. Code of Regs. Title 16, section 1716 in that Respondent Woodland Hills deviated from the requirements of a prescription. The circumstances are that on 9/8/18, Respondent Woodland Hills dispensed the following prescription:

Date	Number	Drug Prescribed	Drug Dispensed	Qty
9/8/18	505800	Oxycodone 15 mg	Oxycodone 30 mg	60

26. There was no notation on this prescription documenting any contacts with the prescriber. This prescription was dispensed in error with a deviation from the prescriber's order without documented prior consent.

SECOND CAUSE FOR DISCIPLINE

(Failure to Document Verbal Orders)

27. Respondent Woodland Hills is subject to disciplinary action under Code section 4070 in that Respondent failed to document an oral or electronic data transmission prescription. The circumstances are that during the time period between 1/19/18 and 8/4/18, Respondent dispensed the following prescriptions:

Date	Rx Number	Patient	Drug	Qty	Prescriber
01/19/18	500215	T.S.	alprazolam 2 mg	60	Yi, Young
02/01/18	500394	T.S.	promethazine/codeine	240	Yi, Young
02/13/18	500555	W.H.	promethazine/codeine	240	Yi, Young
03/15/18	501157	B.P.	promethazine/codeine	240	Lim, Duck
03/17/18	501206	T.S.	alprazolam 2 mg	60	Yi, Young
03/17/18	501207	T.S.	promethazine/codeine	240	Yi, Young
03/17/18	501208	M.S.	promethazine/codeine	240	Lim, Duck

1	03/20/18	501294	J.K.	promethazine/codeine	240	Lim, Duck
2	03/23/18	501388	T.S.	carisoprodol 350 mg	60	Yi, Young
3	03/23/18	501392	A.M	promethazine/codeine	240	Lim, Duck
4	03/24/18	501408	S.B.	alprazolam 2 mg	60	Yi, Young
5	03/24/18	501414	S.S.	promethazine/codeine	240	Yi, Young
6	03/26/18	501421	E.E.	promethazine/codeine	240	Lim, Duck
7	03/29/18	501495	J.K.	promethazine/codeine	240	Lim, Duck
8	04/04/18	501596	S.T.	promethazine/codeine	240	Lim, Duck
9	04/17/18	501889	R.M.	promethazine/codeine	240	Yi, Young
10	04/26/18	502099	S.S.	promethazine/codeine	240	Yi, Young
11	05/01/18	502236	S.B.	promethazine/codeine	240	Yi, Young
12	05/01/18	502245	T.S.	carisoprodol 350 mg	60	Yi, Young
13	05/02/18	502260	B.N.	promethazine/codeine	240	Yi, Young
14	05/07/18	502358	G.S.	promethazine/codeine	240	Yi, Young
15	05/08/18	502389	M.F.	promethazine/codeine	240	Yi, Young
16	05/08/18	502390	C.W.	promethazine/codeine	240	Yi, Young
17	05/09/18	502432	P.G.	promethazine/codeine	240	Yi, Young
18	05/15/18	502551	D.M.	promethazine/codeine	240	Yi, Young
19	05/15/18	502565	L.C.	promethazine/codeine	240	Yi, Young
20	05/16/18	502606	B.N.	promethazine/codeine	240	Yi, Young
21	05/18/18	502648	T.S.	promethazine/codeine	240	Yi, Young
22	05/21/18	502705	C.H.	promethazine/codeine	240	Yi, Young
23	06/04/18	503027	M.W.	promethazine/codeine	240	Yi, Young
24	06/04/18	503028	M.F.	promethazine/codeine	240	Yi, Young
25	06/08/18	503195	T.S.	promethazine/codeine	240	Yi, Young
26	06/09/18	503199	D.M.	promethazine/codeine	240	Yi, Young
27	06/11/18	503222	T.T.	promethazine/codeine	240	Yi, Young

06/11/18	503223	T.S.	alprazolam 2 mg	60	Yi, Young
07/16/18	504136	S.S.	alprazolam 2 mg	90	Yi, Young
07/19/18	504239	T.S.	alprazolam 2 mg	60	Yi, Young
08/04/18	504712	S.S.	alprazolam 2 mg	60	Yi, Young

28. The 38 prescriptions were not written on valid controlled substances forms. Respondent Woodland Hills admitted that they failed to document verbal orders for these prescriptions.

THIRD CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Failure to Comply with Security Form Requirements)

29. Respondent Woodland Hills is subject to disciplinary action under Code section 4301, subdivision (c) in conjunction with Health and Safety Code sections 11152 and 11164 in that Respondent failed to ensure that controlled substances were dispensed in accordance with security form requirements as required.

30. Specifically, the prescriptions identified in paragraph 27, above, were not written on the proper controlled substance security forms and were missing nearly all required security features.

FOURTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Failure to Comply with Corresponding Responsibility)

31. Respondent Woodland Hills is subject to disciplinary action under Code sections 4301, subdivision (c) and 4306.5, subdivisions (a) – (b) in conjunction with Cal. Code of Regs. Title 16, section 1761, Health and Safety Code sections 11153 and Code of Fed. Regs. Title 21, Part 1306, Section 04 in that Respondent failed to comply with its corresponding responsibility.

32. Specifically, the prescriptions identified in paragraph 27, above, all demonstrated the following irregularities:

- All were paid by the patients without the benefit of insurance;

- All of the Alprazolam 2mg prescriptions constitute the highest strength available and not a starting dose;
- All patients lived out of the area from the pharmacy, and most lived in the opposite direction;
- Both prescribers were located out of the area;
- Prescription (RX) 501414 was dispensed over three (3) months after it was written on 12/21/17;
- RX 502432 was prepared with an illegible date;
- Controlled substance prescriptions continued to be written on invalid forms for six months.

33. In addition, during the time period between 11/3/17 – 2/24/20 (relevant time period), Respondent Woodland Hills dispensed controlled substances after ignoring and or failing to recognize objective factors which were irregular from medically legitimate prescriptions. The objective facts based on the data retrieved for the relevant time period include the following:

- Oxycodone 30 mg, the highest strength, was the third most commonly dispensed drug;
- Oxycodone 30 mg accounted for almost 80 percent of all oxycodone prescriptions;
- Out of area prescribers of oxycodone 30 mg;
- Out of area patients dispensed oxycodone 30 mg;
- New patients dispensed oxycodone 30 mg;
- Uniformity of treatment for large percentage of patients;
- Cash payments for controlled substances beyond usual percentage seen with non-controlled substances;
- Over 190 instances of dispensing interacting drugs together, promethazine/codeine with hydrocodone/APAP from one prescriber;
- Similar or identical prescriptions for controlled substances dispensed to multiple patients with the following irregularities:

- On the same days

- With high doses of oxycodone 30 mg;
- Or promethazine/codeine with hydrocodone/APAP, which has a boxed warning drug interaction;
- From out of area prescribers;
- To out of area patients;
- Failure to follow pharmacy's own policy and procedure which would have identified all red flags and irregularities;
- Initial prescriptions written for unusually high doses of oxycodone;
- Prescriptions switched from lower does controlled substances to higher at 238 – 1700% percent increases for the following prescriptions:

Date	Rx No.		Date	Rx No.		Date	Rx No.		Date	Rx No.
2/24/18	500761		8/2/18	504640		3/1/19	513527		4/3/19	515019
2/24/18	500760		8/13/18	504946		3/4/19	513584		4/3/19	515017
2/27/18	501798		8/22/18	505262		3/5/19	513682		4/4/19	515187
4/5/18	501626		9/1/18	505585		3/7/19	513768		4/16/19	515768
4/10/18	501727		9/1/18	505584		3/8/19	513825		4/16/19	515767
4/13/18	501836		9/8/18	505800		3/12/19	514033		4/17/19	515838
4/17/18	501890		9/8/18	505798		3/12/19	514040		5/3/19	516621
4/20/18	501986		9/9/18	505845		3/14/19	514151		5/14/19	517098
5/1/18	502269		9/11/18	505945		3/15/19	514214		8/8/19	521647
5/4/18	502329		10/15/18	507180		3/15/19	514229		10/14/19	525750
5/22/18	502751		10/29/18	507749		3/19/19	514408		10/25/19	526451
5/23/18	502794		11/5/18	508084		3/19/19	514406		11/12/19	527719
6/27/18	503585		11/7/18	508253		3/21/19	514504		11/25/19	528507
7/5/18	503787		11/16/18	508637		3/25/19	514673			
7/7/18	503861		11/19/18	508744		3/27/19	514803			
8/1/18	504609		11/19/18	508746		4/2/19	515008			

34. Respondent Woodland Hills failed to fulfill their corresponding responsibility by repeatedly failing to resolve patterns of irregularities and red flags, and dispensing over 98,000 doses of controlled substances.

35. Respondent Woodland Hills operated in a manner that was a gross deviation from the standard of safe pharmacy practice, and which could cause harm to patients or other persons in violation of pharmacy law.

FIFTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Excessive Furnishing of Controlled Substances)

36. Respondent Woodland Hills is subject to disciplinary action under Code section 4301, subdivision (d) in that Respondent excessively furnished controlled substances. Complainant incorporates paragraphs 27, 31 – 33 above, as if fully set forth herein.

Shahab Sajadi

SIXTH CAUSE FOR DISCIPLINE

(Deviation from Prescription)

37. Respondent Shahab Sajadi (Respondent Sajadi) is subject to disciplinary action under Cal. Code of Regs. Title 16, section 1716 in that Respondent Sajadi deviated from the requirements of a prescription. Complainant incorporates paragraphs 25 and 26 above, as if fully set forth herein.

SEVENTH CAUSE FOR DISCIPLINE

(Failure to Document Verbal Orders)

38. Respondent Sajadi is subject to disciplinary action under Code section 4070 in that Respondent failed to document an oral or electronic data transmission prescription. Complainant incorporates paragraphs 27 and 28 above, as if fully set forth herein.

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1 **EIGHTH CAUSE FOR DISCIPLINE**

2 (Unprofessional Conduct – Failure to Comply with Security Form Requirements)

3 39. Respondent Sajadi is subject to disciplinary action under Code section 4301,
4 subdivision (c) in conjunction with Health and Safety Code sections 11152 and 11164 in that
5 Respondent failed to ensure that controlled substances were dispensed in accordance with
6 security form requirements as required. Complainant incorporates paragraphs 27, 29 and 30
7 above, as if fully set forth herein.

8 **NINTH CAUSE FOR DISCIPLINE**

9 (Unprofessional Conduct – Failure to Comply with Corresponding Responsibility)

10 40. Respondent Sajadi is subject to disciplinary action under Code sections 4301,
11 subdivision (c) and 4306.5, subdivisions (a) – (b) in conjunction with Cal. Code of Regs. Title 16,
12 section 1761, Health and Safety Code sections 11153 and Code of Fed. Regs. Title 21, Part 1306,
13 Section 04 in that Respondent failed to comply with its corresponding responsibility.
14 Complainant incorporates paragraphs 27, 31 – 33 above, as if fully set forth herein.

15 41. Respondent Sajadi owned, managed and operated Respondent Woodland Hills in an
16 unprofessional manner with the inappropriate exercise of his education, training or experience
17 and best professional judgment as a pharmacist by:

- 18 • Dispensing or allowing to be dispensed, controlled substance prescriptions and
19 ignoring or not being aware of, objective signs of irregularity and abuse;
20 • Dispensing or allowing to be dispensed, controlled substance prescriptions without
21 ensuring they were issued for a legitimate medical purpose and in the usual course
22 of professional practice;
23 • Failing to consult appropriate patient, prescription, and other records to prevent the
24 dispensing of illegitimate prescriptions;
25 • Failing to ensure compliance with pharmacy laws and regulations.

26 42. Respondent Sajadi failed to fulfill his corresponding responsibility by repeatedly
27 failing to resolve patterns of irregularities and red flags, and dispensing over 98,000 doses of
28 controlled substances.

43. Respondent Sajadi operated in a manner that was a gross deviation from the standard of safe pharmacy practice, and which could cause harm to patients or other persons in violation of pharmacy law.

TENTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Failure to Consult Records)

44. Respondent Sajadi is subject to disciplinary action under Code sections 4301, subdivision (c) and 4306.5, subdivision (c) in that Respondent failed to consult the appropriate patient, prescription, and other records pertaining to the performance of a pharmacy function. Complainant incorporates paragraph 41 above, as if fully set forth herein.

ELEVENTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Failure to Maintain Patient-Specific Records)

45. Respondent Sajadi is subject to disciplinary action under Code sections 4301, subdivision (c) and 4306.5, subdivision (d) in that Respondent failed to fully maintain and retain appropriate patient-specific information pertaining to the performance of a pharmacy function. Complainant incorporates paragraph 41 above, as if fully set forth herein.

TWELFTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Excessive Furnishing of Controlled Substances)

46. Respondent Sajadi is subject to disciplinary action under Code section 4301, subdivision (d) in in that Respondent excessively furnished controlled substances. Complainant incorporates paragraphs 27, 31 – 33 above, as if fully set forth herein.

Kambiz Ahadimoghaddam

THIRTEENTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Failure to Comply with Security Form Requirements)

47. Respondent Kambiz Ahadimoghaddam (Respondent Kambiz) is subject to disciplinary action under Code section 4301, subdivision (c) in conjunction with Health and Safety Code sections 11152 and 11164 in that Respondent failed to ensure that controlled

1 substances were dispensed in accordance with security form requirements as required.

2 Complainant incorporates paragraphs 27, 29 and 30 above, as if fully set forth herein.

3 **FOURTEENTH CAUSE FOR DISCIPLINE**

4 (Unprofessional Conduct – Failure to Comply with Corresponding Responsibility)

5 48. Respondent Kambiz is subject to disciplinary action under Code sections 4301,
6 subdivision (c) and 4306.5, subdivisions (a) – (b) in conjunction with Cal. Code of Regs. Title 16,
7 section 1761, Health and Safety Code sections 11153 and Code of Fed. Regs. Title 21, Part 1306,
8 Section 04 in that Respondent failed to comply with its corresponding responsibility.

9 Complainant incorporates paragraphs 27, 31 – 33 above, as if fully set forth herein.

10 49. Respondent Kambiz owned, managed and operated Respondent Woodland Hills in an
11 unprofessional manner with the inappropriate exercise of his education, training or experience
12 and best professional judgment as a pharmacist by:

- 13 • Dispensing or allowing to be dispensed, controlled substance prescriptions and
14 ignoring or not being aware of, objective signs of irregularity and abuse;
- 15 • Dispensing or allowing to be dispensed, controlled substance prescriptions without
16 ensuring they were issued for a legitimate medical purpose and in the usual course
17 of professional practice;
- 18 • Failing to consult appropriate patient, prescription, and other records to prevent the
19 dispensing of illegitimate prescriptions;
- 20 • Failing to ensure compliance with pharmacy laws and regulations.

21 50. Respondent Kambiz failed to fulfill his corresponding responsibility by repeatedly
22 failing to resolve patterns of irregularities and red flags, and dispensing over 98,000 doses of
23 controlled substances.

24 51. Respondent Kambiz operated in a manner that was a gross deviation from the
25 standard of safe pharmacy practice, and which could cause harm to patients or other persons in
26 violation of pharmacy law.

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1 **FIFTEENTH CAUSE FOR DISCIPLINE**

2 (Unprofessional Conduct – Failure to Consult Records)

3 52. Respondent Kambiz is subject to disciplinary action under Code sections 4301,
4 subdivision (c) and 4306.5, subdivision (c) in that Respondent failed to consult the appropriate
5 patient, prescription, and other records pertaining to the performance of a pharmacy function.
6 Complainant incorporates paragraph 49 above, as if fully set forth herein.

7 **SIXTEENTH CAUSE FOR DISCIPLINE**

8 (Unprofessional Conduct – Failure to Maintain Patient-Specific Records)

9 53. Respondent Kambiz is subject to disciplinary action under Code sections 4301,
10 subdivision (c) and 4306.5, subdivision (d) in that Respondent failed to fully maintain and retain
11 appropriate patient-specific information pertaining to the performance of a pharmacy function.
12 Complainant incorporates paragraph 49 above, as if fully set forth herein.

13 **SEVENTEENTH CAUSE FOR DISCIPLINE**

14 (Unprofessional Conduct – Excessive Furnishing of Controlled Substances)

15 54. Respondent Kambiz is subject to disciplinary action under Code section 4301,
16 subdivision (d) in in that Respondent excessively furnished controlled substances. Complainant
17 incorporates paragraphs 27, 31 – 33 above, as if fully set forth herein.

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19 **OTHER MATTERS**

20 55. Pursuant to Code section 4307, if Pharmacy Permit Number PHY 55843 issued to
21 Woodland Hills Rx Pharmacy Corp. dba Woodland Hills Rx Pharmacy is suspended, revoked, or
22 placed on probation, and Shahab Sajadi, while acting as the manager, administrator, owner,
23 member, officer, director, associate, or partner, had knowledge of or knowingly participated in
24 any conduct for which Pharmacy Permit Number PHY 55843 was revoked, suspended, or placed
25 on probation, Shahab Sajadi shall be prohibited from serving as a manager, administrator, owner,
26 member, officer, director, associate, or partner of a licensee of the Board.

27 56. Pursuant to Code section 4307, if Pharmacy Permit Number PHY 55843 issued to
28 Woodland Hills Rx Pharmacy Corp. dba Woodland Hills Rx Pharmacy is suspended, revoked, or

1 placed on probation, and Kambiz Ahadimoghaddam, while acting as the manager, administrator,
2 owner, member, officer, director, associate, or partner, had knowledge of or knowingly
3 participated in any conduct for which Pharmacy Permit Number PHY 55843 was revoked,
4 suspended, or placed on probation, Kambiz Ahadimoghaddam shall be prohibited from serving as
5 a manager, administrator, owner, member, officer, director, associate, or partner of a licensee of
6 the Board.

7 57. Pursuant to Code section 4307, if Pharmacist License Number RPH 72295 issued to
8 Shahab Sajadi is suspended or revoked, he shall be prohibited from serving as a manager,
9 administrator, owner, member, officer, director, associate, or partner of a licensee.

10 58. Pursuant to Code section 4307, if Pharmacist License Number RPH 72851 issued to
11 Kambiz Ahadimoghaddam is suspended or revoked, he shall be prohibited from serving as a
12 manager, administrator, owner, member, officer, director, associate, or partner of a licensee.

13 PRAYER

14
15 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
16 and that following the hearing, the Board of Pharmacy issue a decision:

17 1. Revoking or suspending Pharmacy Permit Number PHY 55843, issued to Woodland
18 Hills Rx Pharmacy Corp. dba Woodland Hills Pharmacy Rx, Shahab Sajadi, CEO/Pres;

19 2. Prohibiting Woodland Hills Rx Pharmacy Corp. dba Woodland Hills Pharmacy Rx
20 from serving as a manager, administrator, owner, member, officer, director, associate, or partner
21 of a licensee for five years if Pharmacy Permit No. PHY 55843 is placed on probation or until
22 Pharmacy Permit No. PHY 55843 is reinstated if Pharmacy Permit No. PHY 55843 issued to
23 Woodland Hills Rx Pharmacy Corp. dba Woodland Hills Pharmacy Rx is revoked;

24 3 Revoking or suspending Pharmacist License No. RPH 72295, issued to Shahab Sajadi
25 aka Shahaboddin Sajadi;

26 4. Prohibiting Shahab Sajadi aka Shahaboddin Sajadi, CEO/President from serving as a
27 manager, administrator, owner, member, officer, director, associate, or partner of a licensee for
28 five years if Pharmacist License No. RPH 72295 is placed on probation or until Pharmacist

License No. PHY 72295 is reinstated if Pharmacist License No. PHY 72295 issued to Shahab Sajad aka Shahaboddin Sajadi is revoked;

5 Revoking or suspending Pharmacist License Number RPH 72851, issued to Kambiz Ahadimoghaddam aka Kambiz Ahmadi;

6 Prohibiting Kambiz Ahadimoghaddam aka Kambiz Ahmadi, secretary, from serving
as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee
for five years if Pharmacist License No. RPH 72851 is placed on probation or until Pharmacist
License No. PHY 72851 is reinstated if Pharmacist License No. PHY 72851 issued to Kambiz
Ahadimoghaddam aka Kambiz Ahmadi is revoked;

7. Ordering Woodland Hills Rx Pharmacy Corp. dba Woodland Hills Pharmacy Rx,
Shahab Sajad aka Shahaboddin Sajadi and Kambiz Ahadimoghaddam aka Kambiz Ahmadi 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,

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

DATED: 1/13/2021

Signature on File

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

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