

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

In the Matter of the Accusation Against:

**MEDS FOR VETS LLC;
JANICE LEE ERICKSON, MEMBER,**

Original Non-Resident Pharmacy Permit No. NRP 1720,

Respondent

Agency Case No. 7009

OAH No. 2020120660

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order for Public Reprimand 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 18, 2021.

It is so ORDERED on July 19, 2021.

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" clearly visible.

Seung W. Oh, Pharm.D.
Board President

MATTHEW RODRIQUEZ
Acting Attorney General of California
DAVID E. BRICE
Supervising Deputy Attorney General
PATRICIA WEBBER HEIM
Deputy Attorney General
State Bar No. 230889
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Telephone: (916) 210-7519
Facsimile: (916) 327-8643
E-mail: Patricia.Heim@doj.ca.gov
Attorneys for Complainant

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

In the Matter of the Accusation Against:

**MEDS FOR VETS LLC; JANICE LEE
ERICKSON, MEMBER
9550 S. State Street
Sandy, UT 84070**

**Original Non-Resident Pharmacy Permit
No. NRP 1720**

Respondent.

Case No. 7009

OAH No. 2020120660

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER FOR PUBLIC
REPROVAL**

[Bus. & Prof. Code § 495]

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

PARTIES

1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy (Board). She brought this action solely in her official capacity and is represented in this matter by Matthew Rodriguez, Acting Attorney General of the State of California, by Patricia Webber Heim, Deputy Attorney General.

2. Respondent Meds for Vets LLC; Janice Lee Erickson, Member (Respondent) is represented in this proceeding by attorney Tony J. Park, whose address is: 55 Cetus, 1st Floor, Irvine, CA 92618.

JURISDICTION

3. On or about May 3, 2017, the Board issued Original Non-Resident Pharmacy Permit No. NRP 1720 to Respondent. The Original Non-Resident Pharmacy Permit was in full force and effect at all times relevant to the charges brought in Accusation No. 7009 and will expire on May 1, 2021, unless renewed.

4. Accusation No. 7009 was filed before the Board and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on September 28, 2020. Respondent timely filed its Notice of Defense contesting the Accusation. A copy of Accusation No. 7009 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 7009. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order for Public Repeval.

6. Respondent is fully aware of its legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at its own expense; the right to confront and cross-examine the witnesses against them; the right to present evidence and to testify on its own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

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

1 **CULPABILITY**

2 8. Respondent understands and agrees that the charges and allegations in Accusation
3 No. 7009, if proven at a hearing, constitute cause for imposing discipline upon its Original Non-
4 Resident Pharmacy Permit.

5 9. For the purpose of resolving the Accusation without the expense and uncertainty of
6 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
7 basis for the charges in the Accusation, and that Respondent hereby gives up its right to contest
8 those charges.

9 10. Respondent agrees that its Original Non-Resident Pharmacy Permit is subject to
10 discipline and agrees to be bound by the Disciplinary Order below.

11 **CONTINGENCY**

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

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

25 13. This Stipulated Settlement and Disciplinary Order for Public Repeval is intended by
26 the parties to be an integrated writing representing the complete, final, and exclusive embodiment
27 of their agreement. It supersedes any and all prior or contemporaneous agreements,
28 understandings, discussions, negotiations, and commitments (written or oral). This Stipulated

1 Settlement and Disciplinary Order for Public Repeval may not be altered, amended, modified,
2 supplemented, or otherwise changed except by a writing executed by an authorized representative
3 of each of the parties.

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

7 **DISCIPLINARY ORDER**

8 IT IS HEREBY ORDERED that Original Non-Resident Pharmacy Permit No. NRP 1720
9 issued to Respondent Meds for Vets LLC; Janice Lee Erickson, Pharmacist-In-Charge
10 (Respondent) shall be publicly reprovod by the Board of Pharmacy under Business and
11 Professions Code section 495 in resolution of Accusation No. 7009, attached as exhibit A.
12 Respondent is required to report this reprovod as a disciplinary action.

13 **Cost Recovery.** Respondent shall pay \$5,000.00 to the Board for its costs associated with
14 the investigation and enforcement of this matter pursuant to Business and Professions Code
15 Section 125.3. If Respondent fails to pay the Board costs as ordered, Respondent shall not be
16 allowed to renew their Original Non-Resident Pharmacy Permit until Respondent pays costs in
17 full. In addition, the Board may enforce this order for payment of its costs in any appropriate
18 court, in addition to any other rights the Board may have.

19 **Consultant Review of Pharmacy Operations.** Respondent Pharmacy shall retain an
20 independent consultant at its own expense, for one year after the effective date of the decision,
21 who shall be responsible for reviewing pharmacy operations quarterly basis for compliance by
22 Respondent Pharmacy with state and federal laws and regulations governing the practice of
23 pharmacy, and compliance by respondent. During the period of review, the Board or its designee,
24 retains the discretion to reduce or increase the frequency of the inspection of the pharmacist
25 consultant's review.

26 The consultant shall be a licensed pharmacist and not on probation with the Board and
27 whose name shall be submitted to the Board or its designee, for prior approval, within thirty
28 (30) days of the effective date of this decision. At the approval of the Board, or its designee,

Respondent may request approval of virtual consultation. In the alternative, Respondent may request approval for a Utah-based licensed-pharmacist-consultant.

Failure to timely retain, seek approval of, or ensure timely reporting by the consultant shall be considered a violation of this settlement agreement.

Full Compliance. As a resolution of the charges in Accusation No. 7009, this stipulated settlement is contingent upon Respondent's full compliance with all conditions of this Order. If Respondent fails to satisfy any of these conditions, such failure to comply constitutes cause for discipline, including outright revocation, of Respondent's Original Non-Resident Pharmacy Permit No. NRP 1720.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order for Public Reproval and have fully discussed it with my attorney, Tony J. Park, Esq. I understand the stipulation and the effect it will have on my Original Non-Resident Pharmacy Permit. I enter into this Stipulated Settlement and Disciplinary Order for Public Reproval voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: _____

MEDS FOR VETS LLC; JANICE LEE
ERICKSON, MEMBER
Respondent

I have read and fully discussed with Respondent Meds for Vets LLC; Janice Lee Erickson, Member the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order for Public Reproval. I approve its form and content.

DATED: _____

TONY J. PARK, ESQ.
Attorney for Respondent

1 Respondent may request approval of virtual consultation. In the alternative, Respondent may
2 request approval for a Utah-based licensed-pharmacist-consultant.


3 Failure to timely retain, seek approval of, or ensure timely reporting by the consultant shall
4 be considered a violation of this settlement agreement.

5 **Full Compliance.** As a resolution of the charges in Accusation No. 7009, this stipulated
6 settlement is contingent upon Respondent's full compliance with all conditions of this Order. If
7 Respondent fails to satisfy any of these conditions, such failure to comply constitutes cause for
8 discipline, including outright revocation, of Respondent's Original Non-Resident Pharmacy
9 Permit No. NRP 1720.

10 **ACCEPTANCE**

11 I have carefully read the above Stipulated Settlement and Disciplinary Order for Public
12 Reproval and have fully discussed it with my attorney, Tony J. Park, Esq. I understand the
13 stipulation and the effect it will have on my Original Non-Resident Pharmacy Permit. I enter into
14 this Stipulated Settlement and Disciplinary Order for Public Reproval voluntarily, knowingly, and
15 intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

16
17 DATED: 4/26/21


18 MEDS FOR VETS LLC; JANICE LEE
19 ERICKSON, MEMBER
Respondent

20 I have read and fully discussed with Respondent Meds for Vets LLC; Janice Lee Erickson,
21 Member the terms and conditions and other matters contained in the above Stipulated Settlement
22 and Disciplinary Order for Public Reproval. I approve its form and content.

23 DATED: _____

24 TONY J. PARK, ESQ.
25 Attorney for Respondent
26
27
28

1 Respondent may request approval of virtual consultation. In the alternative, Respondent may
2 request approval for a Utah-based licensed-pharmacist-consultant.

3 Failure to timely retain, seek approval of, or ensure timely reporting by the consultant shall
4 be considered a violation of this settlement agreement.

5 **Full Compliance.** As a resolution of the charges in Accusation No. 7009, this stipulated
6 settlement is contingent upon Respondent's full compliance with all conditions of this Order. If
7 Respondent fails to satisfy any of these conditions, such failure to comply constitutes cause for
8 discipline, including outright revocation, of Respondent's Original Non-Resident Pharmacy
9 Permit No. NRP 1720.

10 **ACCEPTANCE**

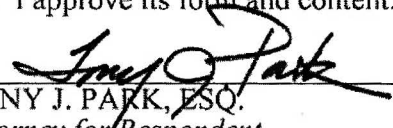
11 I have carefully read the above Stipulated Settlement and Disciplinary Order for Public
12 Repeal and have fully discussed it with my attorney, Tony J. Park, Esq. I understand the
13 stipulation and the effect it will have on my Original Non-Resident Pharmacy Permit. I enter into
14 this Stipulated Settlement and Disciplinary Order for Public Repeal voluntarily, knowingly, and
15 intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

16
17 DATED: _____

18 MEDS FOR VETS LLC; JANICE LEE
19 ERICKSON, MEMBER
Respondent

20 I have read and fully discussed with Respondent Meds for Vets LLC; Janice Lee Erickson,
21 Member the terms and conditions and other matters contained in the above Stipulated Settlement
22 and Disciplinary Order for Public Repeal. I approve its form and content.

23 DATED: 04/28/2021 _____

24 
25 TONY J. PARK, ESQ.
26 Attorney for Respondent
27
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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order for Public Reapproval is hereby respectfully submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

DATED: _____

Respectfully submitted,

MATTHEW RODRIQUEZ
Acting Attorney General of California
DAVID E. BRICE
Supervising Deputy Attorney General

PATRICIA WEBBER HEIM
Deputy Attorney General
Attorneys for Complainant

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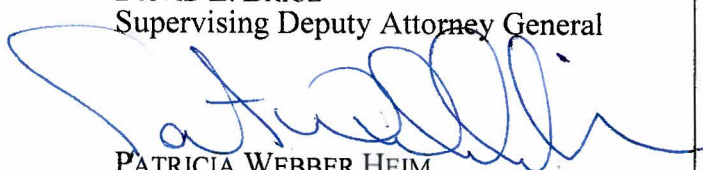
ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order for Public Reapproval is hereby respectfully submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

DATED: 4/29/2021

Respectfully submitted,

ROB BONTA
Attorney General of California
DAVID E. BRICE
Supervising Deputy Attorney General



PATRICIA WEBBER HEIM
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 7009

1 XAVIER BECERRA
Attorney General of California
2 DAVID E. BRICE
Supervising Deputy Attorney General
3 PATRICIA WEBBER HEIM
Deputy Attorney General
4 State Bar No. 230889
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 210-7519
Facsimile: (916) 327-8643
7 E-mail: Patricia.Heim@doj.ca.gov
Attorneys for Complainant

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

13 In the Matter of the Accusation Against:

Case No. 7009

14 **MEDS FOR VETS LLC; JANICE LEE**
15 **ERICKSON, MEMBER**
16 **9550 S. State Street**
17 **Sandy, UT 84070**

ACCUSATION

18 **Original Non-Resident Pharmacy Permit**
19 **No. NRP 1720**

Respondent.

20
21 Complainant alleges:

22 **PARTIES**

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

25 2. On or about May 3, 2017, the Board issued Original Non-Resident Pharmacy Permit
26 Number NRP 1720 to Meds for Vets LLC; Janice Lee Erickson, Member (Respondent). Janice
27 Lee Erickson is and has been the Pharmacist-in-Charge of Meds for Vets LLC since May 3, 2014.
28

1 The Original Non-Resident Pharmacy Permit was in full force and effect at all times relevant to
2 the charges brought herein and will expire on May 1, 2021, unless renewed.

3 **JURISDICTION**

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

7 4. Section 4300 of the Code states, in pertinent part:

8 (a) Every license may be suspended or revoked.

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

11 (1) Suspending judgment.

12 (2) Placing him or her upon probation.

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

14 (4) Revoking his or her license.

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

17 5. Section 4300.1 of the Code states:

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

21 6. Section 4307 of the Code states:

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

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

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

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

10 (c) The provisions of subdivision (a) may be alleged in any pleading filed
11 pursuant to Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of
12 the Government Code. However, no order may be issued in that case except as to a
13 person who is named in the caption, as to whom the pleading alleges the applicability
14 of this section, and where the person has been given notice of the proceeding as
15 required by Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of
16 the Government Code. The authority to proceed as provided by this subdivision shall
17 be in addition to the board's authority to proceed under Section 4339 or any other
18 provision of law.

19 **STATUTORY PROVISIONS**

20 7. Section 4301 of the Code states, in pertinent part:

21 The board shall take action against any holder of a license who is guilty of
22 unprofessional conduct . . . Unprofessional conduct shall include, but is not limited to,
23 any of the following:

24

25 (n) The revocation, suspension, or other discipline by another state of a license
26 to practice pharmacy, operate a pharmacy, or do any other act for which a license is
27 required by this chapter that would be grounds for revocation, suspension, or other
28 discipline under this chapter. Any disciplinary action taken by the board pursuant to
this section shall be coterminous with action taken by another state, except that the
term of any discipline taken by the board may exceed that of another state, consistent
with the board's enforcement guidelines. The evidence of discipline by another state
is conclusive proof of unprofessional conduct.

8. Section 4113 of the Code states, in pertinent part:

(a) Every pharmacy shall designate a pharmacist-in-charge . . .

. . . .

(c) The pharmacist-in-charge shall be responsible for a pharmacy's
compliance with all state and federal laws and regulations pertaining to the practice of
pharmacy.

1 **COST RECOVERY**

2 9. Code section 125.3 states, in pertinent part, that the Board may request the
3 administrative law judge to direct a licensee found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case.

6 **CAUSE FOR DISCIPLINE**

7 **(Out of State Discipline)**

8 10. Respondent is subject to disciplinary action under Code section 4301, subdivision (n),
9 in that Respondent's license to practice or operate a pharmacy has been disciplined by another
10 state, as follows:

11 a. Effective June 11, 2009, pursuant to the Consent Order in the matter entitled *In the*
12 *Matter of Meds for Vets, Respondent*, in Case Number 2009-0062, the Oregon Board of Pharmacy
13 imposed a \$5,000 civil penalty (with \$4,000 stayed pending no further violations of ORS 689.305
14 for three years). Respondent must appropriately register with the Oregon Board prior to shipping
15 prescriptions into Oregon without a nonresident pharmacy license.

16 b. Effective August 6, 2019, pursuant to the Agreed Board Order No. K-17-035 in the
17 matter entitled *In the Matter of Meds for Vets LLC (Pharmacy License #25697)*, the Texas State
18 Board of Pharmacy issued a \$1,000 fine to Respondent for operating without a Texas-licensed
19 pharmacist-in-charge.

20 c. On or about October 21, 2019, pursuant to the Stipulation and Order in the matter
21 entitled *In the Matter of the Licenses of: Meds for Vets, License Nos: 6769850-1703, and*
22 *6769850-8913 to Practice as a Pharmacy and to Dispense Controlled Substances in the State of*
23 *Utah*, the Division of Occupational and Professional Licensing Department of Commerce of the
24 State of Utah (DOPL) placed Respondent on probation for two years, with terms and conditions.
25 Respondent neither admitted nor denied the following, but agreed that DOPL might find the
26 following:

27 i. On or about October 10, 2017, the DOPL conducted Class A, sterile and non-sterile
28 inspections at Respondent's place of business. The inspection noted violations related to uneven

1 staffing ratios for pharmacy technicians and pharmacists, misplaced labels and/or labeling errors,
2 failure to adhere to current good manufacturing practices for sterile and non-sterile compounding,
3 and missing documentation for staff training and sanitation procedures.

4 ii. The terms and conditions of probation included, but were not limited to submission of
5 a Written Practice Plan for DOPL approval, undergo periodic inspections by a DOPL-approved
6 inspector, and pay a \$15,000 fine (with \$7,500 stayed pending successful completion of
7 probation), pursuant to Utah Code Ann. Section 58-17b-504. On or about January 13, 2020,
8 Respondent paid the required \$7,500 portion of the \$15,000 fine.

9 d. Effective December 11, 2019, pursuant to the Consent Order issued in the matter
10 entitled *In the Matter of Jan Erickson d/b/a/ Meds for Vets, Louisiana Pharmacy Permit No 6258*,
11 Case No. 18-0348, by the Louisiana State Board of Pharmacy. Pursuant to La. R.S.
12 37:1241(A)(6), the Louisiana Board suspended Respondent's Pharmacy Permit No. 6258 until
13 October 21, 2021, stayed the suspension, and placed Respondent on probation for two years. The
14 Louisiana Board also assessed Respondent a \$250 fine, as a reciprocal action to the Utah DOPL
15 disciplinary order issued on October 21, 2019.

16 e. Effective February 18, 2020, pursuant to the Consent Order issued in the matter
17 entitled *In the Matter of: Meds for Vets, LLC, Non-Resident Pharmacy Permit Number: 112999*,
18 Case No. 19-L-0151, the Alabama State Board of Pharmacy found that Respondent violated Code
19 of Alabama sections 34-23-22(2) and (13) [via Alabama Board Rule 680-X-2.22(2)(d)], 34-23-
20 34, 34-23-92(12), 20-2-213(e), and 41-22-12. The Alabama Board placed Respondent on
21 probation until October 15, 2021, subject to the same terms and conditions as the Utah Board
22 Stipulation and Order. The discipline was based on the above-referenced disciplinary actions by
23 the Texas and Oregon State Boards of Pharmacy, as well as the Utah DOPL order. The Alabama
24 Board also assessed Respondent a \$10,000 administrative fine.

25 f. Effective March 12, 2020, pursuant to the Order of Mandatory Suspension in the
26 matter entitled *In re: Meds for Vets*, Registration No. 0214-001210, Case No. 202896, the
27 Virginia Department of Health Professions suspended Respondent's license. Pursuant to Virginia
28 Code section 54.1-2409, the Virginia Board suspended Respondent's license as a reciprocal

1 action to Louisiana Board Case Number 18-0348. Respondent's Virginia license remained on
2 suspension as of a July 22, 2020, search of the Virginia Board's website.

3 **OTHER MATTERS**

4 11. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit Number
5 PHY 50426 issued to Meds for Vets LLC; Janice Lee Erickson, Member, Meds for Vets LLC;
6 Janice Lee Erickson, Member shall be prohibited from serving as a manager, administrator,
7 owner, member, officer, director, associate, or partner of a licensee for five years if Original Non-
8 Resident Pharmacy Permit Number NRP 1720 is placed on probation or until Original Non-
9 Resident Pharmacy Permit Number NRP 1720 is reinstated if it is revoked.

10 12. Pursuant to Code section 4307, if discipline is imposed on Original Non-Resident
11 Pharmacy Permit Number NRP 1720 issued to Meds for Vets LLC; Janice Lee Erickson,
12 Member, while Janice Lee Erickson has been a member and had knowledge of or knowingly
13 participated in any conduct for which the licensee was disciplined, Janice Lee Erickson shall be
14 prohibited from serving as a manager, administrator, owner, member, officer, director, associate,
15 or partner of a licensee for five years if Original Non-Resident Pharmacy Permit Number NRP
16 1720 is placed on probation or until Original Non-Resident Pharmacy Permit Number NRP 1720
17 is reinstated if it is revoked.

18 **PRAYER**

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

21 1. Revoking or suspending Original Non-Resident Pharmacy Permit Number NRP 1720,
22 issued to Meds for Vets LLC;

23 2. Prohibiting Meds for Vets LLC; Janice Lee Erickson, Member from serving as a
24 manager, administrator, owner, member, officer, director, associate, or partner of a licensee for
25 five years if Original Non-Resident Pharmacy Permit Number NRP 1720 is placed on probation
26 or until Original Non-Resident Pharmacy Permit Number NRP 1720 is reinstated if Original Non-
27 Resident Pharmacy Permit Number NRP 1720 is revoked;

1 3. Prohibiting Janice Lee Erickson from serving as a manager, administrator, owner,
2 member, officer, director, associate, or partner of a licensee for five years if Original Non-
3 Resident Pharmacy Permit Number NRP 1720 is placed on probation or until Original Non-
4 Resident Pharmacy Permit Number NRP 1720 is reinstated if Original Non-Resident Pharmacy
5 Permit Number NRP 1720 is revoked;

6 4. Ordering Meds for Vets LLC and Janice Lee Erickson to pay the Board of Pharmacy
7 the reasonable costs of the investigation and enforcement of this case, pursuant to Business and
8 Professions Code section 125.3; and,

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

10
11
12 DATED: 9/19/2020

Anne Sodergren

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

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