

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

**In the Matter of the First Amended Accusation Against:**

**CENTURY BEVERLY HILLS PHARMACY, INC., DBA,  
CENTURY BEVERLY HILLS PHARMACY, JOSEPH AMIN CEO/PRES**

**Pharmacy Permit No. PHY 43361**

**and**

**DAVOOD BEHDADNIA,**

**Pharmacist License No. RPH 45285,**

**Respondents.**

**Agency Case No. 7131**

**OAH No. 2022040191**

## DECISION AND ORDER

The attached Stipulated Surrender of License 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 April 28, 2023.

It is so ORDERED on March 29, 2023.

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 written in a cursive style with a large initial "S" and "O".

Seung W. Oh, Pharm.D.  
Board President

1 ROB BONTA  
Attorney General of California  
2 NANCY A. KAISER  
Supervising Deputy Attorney General  
3 KEVIN J. RIGLEY  
Deputy Attorney General  
4 State Bar No. 131800  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6301  
6 Facsimile: (916) 731-2126  
*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 First Amended Accusation  
Against:

Case No. 7131

OAH No. 2022040191

13 **CENTURY BEVERLY HILLS**  
14 **PHARMACY INC. DBA CENTURY**  
15 **BEVERLY HILLS PHARMACY, JOSEPH**  
16 **AMIN CEO/PRES**  
17 **412 S. San Vincente Blvd**  
18 **Los Angeles, CA 90048**

**STIPULATED SURRENDER OF**  
**LICENSE AND ORDER AS TO**  
**CENTURY BEVERLY HILLS INC. DBA**  
**CENTURY BEVERLY HILLS**  
**PHARMACY ONLY**

19 **Pharmacy Permit No. PHY 43361,**

20 **and**

21 **DAVOOD BEHDADNIA**  
22 **5101 Topeka Drive**  
23 **Tarzana, CA 91356**

24 **Pharmacist License No. RPH 45285**

25 Respondents.

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

28 **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

1 Rob Bonta, Attorney General of the State of California, by Kevin J. Rigley, Deputy Attorney  
2 General.

3 2. Century Beverly Hills Pharmacy Inc. dba Century Beverly Hills Pharmacy, with  
4 Joseph Amin as 51% Shareholder, CEO and President, and Davood Behdadnia as 49%  
5 Shareholder, Secretary, and Treasurer (Respondent) is represented in this proceeding by attorney  
6 Herbert L. Weinberg, Fenton Law Group, LLP, 1990 S Bundy Drive Suite 777, Los Angeles, CA  
7 90025.

8 3. On or about December 22, 1997, the Board issued Pharmacy Permit Number PHY  
9 43361 to Century Beverly Hills Pharmacy, Inc., doing business as Century Beverly Hills  
10 Pharmacy, with Joseph Amin as 51% Shareholder, CEO, and President, and Davood Behdadnia  
11 as 49% Shareholder, Secretary, and Treasurer (Respondent). The Pharmacy Permit was in full  
12 force and effect at all times relevant to the charges brought herein and will expire on December 1,  
13 2023, unless renewed.

#### 14 **JURISDICTION**

15 4. The First Amended Accusation No. 7131 was filed before the Board, and is currently  
16 pending against Respondent. The Accusation and all other statutorily required documents were  
17 properly served on Respondent on October 28, 2021. The First Amended Accusation and all  
18 other statutorily required documents were properly served on Respondent on May 5, 2022.  
19 Respondent timely filed its Notice of Defense contesting the Accusation. A copy of the First  
20 Amended Accusation No. 7131 (hereinafter referred to as the "Accusation") is attached as Exhibit  
21 A and incorporated by reference.

#### 22 **ADVISEMENT AND WAIVERS**

23 5. Respondent has carefully read, fully discussed with counsel, and understands the  
24 charges and allegations in Accusation No. 7131. Respondent also has carefully read, fully  
25 discussed with counsel, and understands the effects of this Stipulated Surrender of License and  
26 Order.

27 6. Respondent is fully aware of its legal rights in this matter, including the right to a  
28 hearing on the charges and allegations in the Accusation; the right to confront and cross-examine

1 the witnesses against them; the right to present evidence and to testify on its own behalf; the right  
2 to the issuance of subpoenas to compel the attendance of witnesses and the production of  
3 documents; the right to reconsideration and court review of an adverse decision; and all other  
4 rights accorded by the California Administrative Procedure Act and other applicable laws.

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

7 **CULPABILITY**

8 8. Respondent admits the truth of each and every charge and allegation in Accusation  
9 No. 7131, agrees that cause exists for discipline and hereby surrenders its Pharmacy Permit No.  
10 PHY 43361 for the Board's formal acceptance.

11 9. Respondent understands that by signing this stipulation it enables the Board to issue  
12 an order accepting the surrender of its Pharmacy Permit without further process.

13 **CONTINGENCY**

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

23 11. The parties understand and agree that Portable Document Format (PDF) and facsimile  
24 copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures  
25 thereto, shall have the same force and effect as the originals.

26 12. This Stipulated Surrender of License and Order is intended by the parties to be an  
27 integrated writing representing the complete, final, and exclusive embodiment of their agreement.  
28 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,

1 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order  
2 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing  
3 executed by an authorized representative of each of the parties.

4 13. 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 Order:

6 **ORDER**

7 IT IS HEREBY ORDERED that Pharmacy Permit No. PHY 43361, issued to Respondent  
8 Century Beverly Hills Pharmacy Inc. dba Century Beverly Hills Pharmacy, Joseph Amin,  
9 CEO/President (Respondent), is surrendered and accepted by the Board. Respondent and Joseph  
10 Amin understands and agrees that for purposes of Business and Professions Code section 4307,  
11 this surrender shall be construed the same as revocation.

12 1. The surrender of Respondent's Pharmacy Permit and the acceptance of the  
13 surrendered license by the Board shall constitute the imposition of discipline against Respondent.  
14 This stipulation constitutes a record of the discipline and shall become a part of Respondent's  
15 license history with the Board.

16 2. Respondent shall lose all rights and privileges as a pharmacy in California as of the  
17 effective date of the Board's Decision and Order.

18 3. Respondent shall cause to be delivered to the Board its pocket license and, if one was  
19 issued, its wall certificate on or before the effective date of the Decision and Order.

20 4. If Respondent or Joseph Amin ever applies for a pharmacy permit or petitions for  
21 reinstatement in the State of California, the Board shall treat it as a new application for licensure.  
22 Respondent must comply with all the laws, regulations and procedures for licensure in effect at  
23 the time the application or petition is filed, and all of the charges and allegations contained in  
24 Accusation No. 7131 shall be deemed to be true, correct and admitted by Respondent when the  
25 Board determines whether to grant or deny the application or petition. Respondent is required to  
26 report this surrender as disciplinary action. Respondent may not apply for any license, permit, or  
27 registration from the Board for three years from the effective date of this decision.

28 ///

1 5. Respondent or Joseph Amin shall be jointly and severally liable for paying the agency  
2 its costs of investigation and enforcement in the amount of \$14,926.35 prior to issuance of a new  
3 or reinstated pharmacy permit.

4 6. If Respondent or Joseph Amin should ever apply or reapply for a new license or  
5 certification, or petition for reinstatement of a license, by any other health care licensing agency  
6 in the State of California, all of the charges and allegations contained in Accusation, No. 7131  
7 shall be deemed to be true, correct, and admitted by Respondent and Joseph Amin for the purpose  
8 of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

9 **ACCEPTANCE**

10 I have carefully read the above Stipulated Surrender of License and Order and have fully  
11 discussed it with my attorney. I understand the stipulation and the effect it will have on my  
12 Pharmacy Permit. I enter into this Stipulated Surrender of License and Order voluntarily,  
13 knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of  
14 Pharmacy.

15  
16 DATED: \_\_\_\_\_

\_\_\_\_\_  
CENTURY BEVERLY HILLS PHARMACY  
INC. DBA CENTURY BEVERLY HILLS  
PHARMACY, JOSEPH AMIN  
CEO/President  
By: Joseph Amin, CEO/President  
*Respondent*

20 I have read and fully discussed with Respondent Century Beverly Hills Pharmacy Inc. dba  
21 Century Beverly Hills Pharmacy, Joseph Amin CEO/President the terms and conditions and other  
22 matters contained in this Stipulated Surrender of License and Order. I approve its form and  
23 content.

24 DATED: \_\_\_\_\_

\_\_\_\_\_  
HERBERT L. WEINBERG  
*Attorney for Respondent*

1 5. Respondent or Joseph Amin shall be jointly and severally liable for paying the agency  
2 its costs of investigation and enforcement in the amount of \$14,926.35 prior to issuance of a new  
3 or reinstated pharmacy permit.

4 6. If Respondent or Joseph Amin should ever apply or reapply for a new license or  
5 certification, or petition for reinstatement of a license, by any other health care licensing agency  
6 in the State of California, all of the charges and allegations contained in Accusation, No. 7131  
7 shall be deemed to be true, correct, and admitted by Respondent and Joseph Amin for the purpose  
8 of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

9 ACCEPTANCE

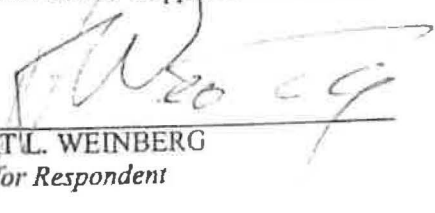
10 I have carefully read the above Stipulated Surrender of License and Order and have fully  
11 discussed it with my attorney. I understand the stipulation and the effect it will have on my  
12 Pharmacy Permit. I enter into this Stipulated Surrender of License and Order voluntarily,  
13 knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of  
14 Pharmacy.

15  
16 DATED: 

Feb 5/2023 CENTURY BEVERLY HILLS PHARMACY  
INC. DBA CENTURY BEVERLY HILLS  
PHARMACY, JOSEPH AMIN  
CEO/President  
By: Joseph Amin, CEO/President  
Respondent

17  
18  
19  
20  
21 I have read and fully discussed with Respondent Century Beverly Hills Pharmacy Inc. dba  
22 Century Beverly Hills Pharmacy, Joseph Amin CEO/President the terms and conditions and other  
23 matters contained in this Stipulated Surrender of License and Order. I approve its form and  
24 content.

25 DATED: 2/3/2023

  
HERBERT L. WEINBERG  
Attorney for Respondent




**ENDORSEMENT**

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

DATED: February 3, 2023

Respectfully submitted,

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

  
KEVIN J. RIGLEY  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**First Amended Accusation No. 7131**

1 ROB BONTA  
Attorney General of California  
2 NANCY A. KAISER  
Supervising Deputy Attorney General  
3 KEVIN J. RIGLEY  
Deputy Attorney General  
4 State Bar No. 131800  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6301  
6 Facsimile: (916) 731-2126  
*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 First Amended Accusation  
Against:

Case No. 7131

13 **CENTURY BEVERLY HILLS PHARMACY**  
14 **INC., DBA CENTURY BEVERLY HILLS**  
15 **PHARMACY; JOSEPH AMIN, 51%**  
16 **SHAREHOLDER, CEO, AND PRESIDENT;**  
17 **DAVOOD BEHDADNIA, 49% SHAREHOLDER,**  
**SECRETARY, AND TREASURER**  
412 S. San Vincente Boulevard  
Los Angeles, CA 90048

**FIRST AMENDED ACCUSATION**

18 Pharmacy Permit No. PHY 43361,

19 **and**

20 **DAVOOD BEHDADNIA**  
18663 Ventura Boulevard, Suite 110  
21 Tarzana, CA 91356

22 Pharmacist License No. RPH 45285

23 Respondents.  
24

25 **PARTIES**

26 1. Anne Sodergren (Complainant) brings this First Amended Accusation solely in her  
27 official capacity as the Executive Officer of the Board of Pharmacy (Board), Department of  
28 Consumer Affairs.

1           2.     On or about December 22, 1997, the Board issued Pharmacy Permit Number PHY  
2 43361 to Century Beverly Hills Pharmacy, Inc., doing business as Century Beverly Hills  
3 Pharmacy, with Joseph Amin as 51% Shareholder, CEO, and President, and Davood Behdadnia  
4 as 49% Shareholder, Secretary, and Treasurer (Respondent Pharmacy). The Pharmacy Permit  
5 was in full force and effect at all times relevant to the charges brought herein and will expire on  
6 December 1, 2022, unless renewed.

7           **Davood Behdadnia (Pharmacist-in-Charge from June 30, 1999 – present)**

8           3.     On or about April 14, 1992, the Board issued Pharmacist License Number RPH  
9 45285 to Davood Behdadnia (Respondent Behdadnia). The Pharmacist License was in full force  
10 and effect at all times relevant to the charges brought herein and will expire on August 31, 2023,  
11 unless renewed.

12                                   **JURISDICTION AND STATUTORY PROVISIONS**

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

16           5.     Section 118, subdivision (b), of the Code provides that the suspension/expiration/  
17 surrender/cancellation of a license shall not deprive the board of jurisdiction to proceed with a  
18 disciplinary action during the period within which the license may be renewed, restored, reissued  
19 or reinstated.

20           6.     Section 4300 of the Code states, in pertinent part:

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

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

24                           (1) Suspending judgment.

25                           (2) Placing him or her upon probation.

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

27                           (4) Revoking his or her license.

28

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

3 (c) The board may refuse a license to any applicant guilty of unprofessional  
4 conduct. The board may, in its sole discretion, issue a probationary license to any  
5 applicant for a license who is guilty of unprofessional conduct and who has met all  
6 other requirements for licensure. The board may issue the license subject to any  
7 terms or conditions not contrary to public policy, including, but not limited to, the  
8 following:

9 (1) Medical or psychiatric evaluation.

10 (2) Continuing medical or psychiatric treatment.

11 (3) Restriction of type or circumstances of practice.

12 (4) Continuing participation in a board-approved rehabilitation program.

13 (5) Abstention from the use of alcohol or drugs.

14 (6) Random fluid testing for alcohol or drugs.

15 (7) Compliance with laws and regulations governing the practice of pharmacy.

16 (d) The board may initiate disciplinary proceedings to revoke or suspend any  
17 probationary certificate of licensure for any violation of the terms and conditions of  
18 probation. Upon satisfactory completion of probation, the board shall convert the  
19 probationary certificate to a regular certificate, free of conditions.

20 (e) The proceedings under this article shall be conducted in accordance with  
21 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the  
22 Government Code, and the board shall have all the powers granted therein. The  
23 action shall be final, except that the propriety of the action is subject to review by the  
24 superior court pursuant to Section 1094.5 of the Code of Civil Procedure.

25 7. Section 4300.1 of the Code states:

26 The expiration, cancellation, forfeiture, or suspension of a board-issued license  
27 by operation of law or by order or decision of the board or a court of law, the  
28 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.

8. Section 4307 of the Code states:

(a) Any person who has been denied a license or whose license has been revoked or is  
under suspension, or who has failed to renew his or her license while it was under  
suspension, or who has been a manager, administrator, owner, member, officer,  
director, associate, partner, or any other person with management or control of any  
partnership, corporation, trust, firm, or association whose application for a license has

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28

1 been denied or revoked, is under suspension or has been placed on probation, and  
2 while acting as the manager, administrator, owner, member, officer, director,  
3 associate, partner, or any other person with management or control had knowledge of  
4 or knowingly participated in any conduct for which the license was denied, revoked,  
5 suspended, or placed on probation, shall be prohibited from serving as a manager,  
6 administrator, owner, member, officer, director, associate, partner, or in any other  
7 position with management or control of a licensee as follows:

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

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

12 (b) "Manager, administrator, owner, member, officer, director, associate, or partner,"  
13 as used in this section and Section 4308, may refer to a pharmacist or to any other  
14 person who serves in that capacity in or for a licensee.

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

#### 24 **STATUTORY AUTHORITY**

25 9. Section 4081 of the Code states, in pertinent part:

26 "(a) All records of manufacture and of sale, acquisition, receipt, shipment, or disposition of  
27 dangerous drugs or dangerous devices shall be at all times during business hours open to  
28 inspection by authorized officers of the law, and shall be preserved for at least three years from  
the date of making. A current inventory shall be kept by every manufacturer, wholesaler, third-  
party logistics provider, pharmacy, veterinary food-animal drug retailer, outsourcing facility,  
physician, dentist, podiatrist, veterinarian, laboratory, licensed correctional clinic, as defined in  
Section 4187, clinic, hospital, institution, or establishment holding a currently valid and  
unrevoked certificate, license, permit, registration, or exemption under Division 2 (commencing  
with Section 1200) of the Health and Safety Code or under Part 4 (commencing with Section  
16000) of Division 9 of the Welfare and Institutions Code who maintains a stock of dangerous  
drugs or dangerous devices."

///

1           10. Section 4105 of the Code states, in pertinent part:

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

5           . . . .

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

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

9           “(a) Every pharmacy shall designate a pharmacist-in-charge and, within 30 days thereof,  
10 shall notify the board in writing of the identity and license number of that pharmacist and the date  
11 he or she was designated.

12           “(b) The proposed pharmacist-in-charge shall be subject to approval by the board. The  
13 board shall not issue or renew a pharmacy license without identification of an approved  
14 pharmacist-in-charge for the pharmacy.

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

17           12. Section 4301 of the Code states, in pertinent part:

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

21           . . . .

22           “(c) Gross negligence.

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

25           . . . .

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

28           . . . .

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

1 or of the applicable federal and state laws and regulations governing pharmacy,  
2 including regulations established by the board or by any other state or federal  
regulatory agency.

3 13. Section 4306.5 of the Code states:

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

5 (a) Acts or omissions that involve, in whole or in part, the inappropriate exercise of  
6 his or her education, training, or experience as a pharmacist, whether or not the act or  
7 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.

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

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

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

15 14. Section 4022 of the Code states:

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

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

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

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

25 15. Section 4332 of the Code states:

26 Any person who fails, neglects, or refuses to maintain the records required by Section 4081  
27 or who, when called upon by an authorized officer or a member of the board, fails, neglects, or  
28



1 refuses to produce or provide the records within a reasonable time, or who willfully produces or  
2 furnishes records that are false, is guilty of a misdemeanor.

3 16. Health and Safety Code section 11152 states:

4 “No person shall write, issue, fill, compound, or dispense a prescription that does not  
5 conform to this division.”

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

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

14 18. Health and Safety Code section 11162.1 states, in pertinent part:

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

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

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

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

23 “(4) A feature printed in thermochromic ink.

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

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

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

28 “1–24

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- “25–49
- “50–74
- “75–100
- “101–150
- “151 and over.

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

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

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

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

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

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

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

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

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

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

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

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1           19. Health and Safety Code section 11164 states, in pertinent part:

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

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

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

14           “(2) The prescription shall also contain the address of the person for whom the controlled  
15 substance is prescribed. If the prescriber does not specify this address on the prescription, the  
16 pharmacist filling the prescription or an employee acting under the direction of the pharmacist  
17 shall write or type the address on the prescription or maintain this information in a readily  
18 retrievable form in the pharmacy.

19           “(b) (1) Notwithstanding paragraph (1) of subdivision (a) of Section 11162.1, any  
20 controlled substance classified in Schedule III, IV, or V may be dispensed upon an oral or  
21 electronically transmitted prescription, which shall be produced in hard copy form and signed and  
22 dated by the pharmacist filling the prescription or by any other person expressly authorized by  
23 provisions of the Business and Professions Code. Any person who transmits, maintains, or  
24 receives any electronically transmitted prescription shall ensure the security, integrity, authority,  
25 and confidentiality of the prescription.

26           “(2) The date of issue of the prescription and all the information required for a written  
27 prescription by subdivision (a) shall be included in the written record of the prescription; the  
28 pharmacist need not include the address, telephone number, license classification, or federal  
registry number of the prescriber or the address of the patient on the hard copy, if that information  
is readily retrievable in the pharmacy.

“(3) Pursuant to an authorization of the prescriber, any agent of the prescriber on behalf of  
the prescriber may orally or electronically transmit a prescription for a controlled substance  
classified in Schedule III, IV, or V, if in these cases the written record of the prescription required  
by this subdivision specifies the name of the agent of the prescriber transmitting the prescription.”

23           20. Health and Safety Code section 11165 states, in pertinent part:

24           . . . .

25           “(d) For each prescription for a Schedule II, Schedule III, or Schedule IV controlled  
26 substance, as defined in the controlled substances schedules in federal law and regulations,  
27 specifically Sections 1308.12, 1308.13, and 1308.14, and respectively, of Title 21 of the  
28 Code of Federal Regulations, the dispensing pharmacy, clinic, or other dispenser shall

1 report the following information to the Department of Justice as soon as reasonably  
2 possible, but not more than seven days after the date a controlled substance is dispensed, in  
3 a format specified by the Department of Justice:

4 “(1) Full name, address, and, if available, telephone number of the ultimate user or research  
5 subject, or contact information as determined by the Secretary of the United States  
6 Department of Health and Human Services, and the gender, and date of birth of the ultimate  
7 user.

8 “(2) The prescriber’s category of licensure, license number, national provider  
9 identifier (NPI) number, the federal controlled substance registration number, and the state  
10 medical license number of any prescriber using the federal controlled substance registration  
11 number of a government-exempt facility, if provided.

12 “(3) Pharmacy prescription number, license number, NPI number, and federal  
13 controlled substance registration number.

14 “(4) National Drug Code (NDC) number of the controlled substance dispensed.

15 “(5) Quantity of the controlled substance dispensed.

16 “(6) International Statistical Classification of Diseases, 9th revision (ICD-9) or 10th  
17 revision (ICD-10) Code, if available.

18 “(7) Number of refills ordered.

19 “(8) Whether the drug was dispensed as a refill of a prescription or as a first-time  
20 request.

21 “(9) Date of origin of the prescription.

22 “(10) Date of dispensing of the prescription.

23 “(11) The serial number for the corresponding prescription form, if applicable.”

24 21. Health and Safety Code section 11165.2 states, in pertinent part:

25 “(a) The Department of Justice may conduct audits of the CURES Prescription  
26 Drug Monitoring Program system and its users.

27 . . . .

28

1 “(g) Nothing in this section shall be deemed to prevent the department from  
2 serving and prosecuting an accusation to suspend or revoke a subscriber if grounds  
for that suspension or revocation exist.”

3 22. Health and Safety Code section 11165.4 states, in pertinent part:

4 “(a) (1) (A) (i) A health care practitioner authorized to prescribe, order, administer, or  
5 furnish a controlled substance shall consult the CURES database to review a patient's controlled  
6 substance history before prescribing a Schedule II, Schedule III, or Schedule IV controlled  
7 substance to the patient for the first time and at least once every four months thereafter if the  
8 substance remains part of the treatment of the patient.”

9 23. Health and Safety Code section 11165.6 states:

10 A prescriber shall be allowed to access the CURES database for a list of patients for whom  
11 that prescriber is listed as a prescriber in the CURES database.

12 **REGULATORY PROVISIONS**

13 24. Code of Federal Regulations Title 21, Part 1306, Section 04 (21 CFR 1306.04)  
14 states, in pertinent part:

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

25 25. California Code of Regulations, title 16, section 1707 states, in pertinent part:

26 “(a) Labels on drug containers dispensed to patients in California shall conform to the  
27 following format:

28 . . . .

1 “(D) The condition or purpose for which the drug was prescribed if the condition or  
2 purpose is indicated on the prescription.”

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

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

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

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

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

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

#### 18 COST RECOVERY

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

#### 25 DRUG CLASSIFICATIONS

26 29. **Roxicodone**, sold under the generic name **oxycodone**, is a Schedule II controlled  
27 substance pursuant to Health and Safety Code section 11055, subdivision (b)(1)(M) and a  
28 dangerous drug pursuant to Code section 4022.

29 30. **Hydrocodone-acetaminophen 10/325**, sold under the brand name **norco** is a  
30 Schedule II controlled is substance pursuant to Health and Safety Code section 11055,  
31 subdivision (b)(1)(I)(ii), and a dangerous drug pursuant to Code section 4022.

1           31. **Soma**, sold under the generic name **carisoprodol**, is a Schedule IV controlled  
2 substance pursuant to Title 21, Code of Federal Regulations, section 1308.14, subdivision (c)(7),  
3 and a dangerous drug pursuant to Business and Professions Code section 4022.

4           32. **Xanax**, sold under the generic name **alprazolam**, is a Schedule IV controlled  
5 substance under Health and Safety Code section 11057, subdivision (d)(1), and a dangerous drug  
6 under Business and Professions Code Section 4022.

7                           **BOARD INVESTIGATION REPORT DATED FEBRUARY 5, 2021**

8           33. This is a corresponding responsibility case. The Board received information that  
9 numerous controlled substance prescriptions were dispensed by Respondent Pharmacy from a  
10 prescriber whose prescriptions apparently exhibited “red flags” of abuse. An investigation  
11 confirmed Respondents’ pattern of dispensing controlled substance prescriptions with  
12 irregularities. Respondent Pharmacy and its pharmacists failed to fulfill their corresponding  
13 responsibility to only dispense medically legitimate controlled substance prescriptions by failing  
14 to address and resolve red flags of abuse and illegitimacy. These acts and omissions constituted  
15 unprofessional conduct and were in violation of pharmacy law.

16           34. Since the last inspection of Respondent Pharmacy recently occurred on December 4,  
17 2019, due to Covid-19, no inspection was completed for this investigation. A board inspector  
18 reviewed Respondent Pharmacy’s CURES information and found patterns of prescriptions  
19 dispensed with red flags of illegitimacy, including high doses of commonly sought after and  
20 frequently abused controlled substances from specific prescribers.

21           35. On August 3, 2020, the board inspector emailed a request for records to Respondent  
22 Behdadnia, PIC of Respondent Pharmacy. In order to obtain the most complete information, the  
23 board inspector specifically requested “any and all records, notes, or related documentation  
24 related to requested listed prescriptions” be provided.

25           36. After being granted a ten-day extension, Respondent Pharmacy subsequently supplied  
26 records to the board inspector which were incomplete on several occasions. Upon working with  
27 their software vendor, Respondent Pharmacy ultimately provided records which seemed complete  
28 and were used for this investigation, which included the following:

- 1 • Dispensing records for the period July 31, 2017 through July 31, 2020
- 2 • Original prescription documents

3 37. The Controlled Substance Utilization Review and Evaluation System (CURES)  
4 program was initiated in 1997 and required mandatory monthly pharmacy reporting of dispensed  
5 schedule II controlled substances. The program was amended in January 2005 to include  
6 mandatory weekly reporting of schedule II-IV medications. The data is collected statewide and  
7 its main goal is to improve healthcare providers' ability to combat prescription drug abuse.

8 38. The component of CURES which is accessible to pharmacists and prescribers is  
9 called the Prescription Drug Monitoring Program (PDMP). Registration for access to the PDMP  
10 has been available since February 2009; however, all practitioners licensed to prescribe or  
11 dispense scheduled medications were required by law to sign up by July 1, 2016. The data has  
12 been utilized by healthcare professionals such as prescribers and pharmacists to aid in  
13 determining whether patients are utilizing their controlled substances safely and appropriately,  
14 ensuring they are not obtaining medical care from multiple prescribers, frequenting multiple  
15 pharmacies, obtaining early refills of controlled substances, travelling far distances to prescribers  
16 or pharmacies, consistently paying cash for their controlled substance prescriptions or attempting  
17 to fill high dose opioids or benzodiazepines when they are naive to either medication.

18 39. According to Health and Safety Code Section 11165.4(a)(1)(A)(i), which became  
19 effective on October 2, 2018, a health care practitioner authorized to prescribe, order, administer,  
20 or furnish a controlled substance shall consult the CURES database to review a patient's  
21 controlled substance history before prescribing a Schedule II, Schedule III, or Schedule IV  
22 controlled substance to the patient for the first time and at least once every four months thereafter  
23 if the substance remains part of the treatment of the patient. It is imperative pharmacists not only  
24 consult CURES but that they also utilize their education and training to appropriately scrutinize  
25 the reports.

26 40. After comparing prescriptions dispensed by Respondent Pharmacy with those  
27 reported to CURES, the board inspector determined that there were 204 controlled substances  
28 prescriptions that were dispensed, but never reported to CURES, totaling 12,284 dosage units.



1           41. Oxycodone 30 mg was the most common drug not reported to CURES by  
2 Respondent Pharmacy, which amounted to 39 prescriptions totaling 3,640 tablets.

3           42. Checking CURES prior to dispensing some controlled substance prescriptions,  
4 especially high dose opioids like oxycodone 30 mg, has become standard in pharmacy practice.  
5 Reasonable and prudent pharmacists, who review patients' medication records for potential drug  
6 therapy problems, as is required, would have noticed data was missing, or incorrect, in CURES  
7 reports. Without these records, healthcare professionals did not have access to CURES  
8 information from Respondent Pharmacy with which to make informed decisions regarding the  
9 prescribing and dispensing of controlled substances. Supplying controlled substances to patients  
10 who duplicate medications can directly harm patients or other persons.

11           43. Respondent Behdadnia, as the PIC at Respondent Pharmacy, responded to an email  
12 request by the board inspector that was sent in an effort to identify pharmacists in Respondent  
13 Pharmacy dispensing records. Since several initials in the records were not for pharmacists, and  
14 only one controlled substance prescription was noted as being verified by another pharmacist, the  
15 board inspector determined that Respondent Behdadnia was directly responsible for all  
16 prescriptions dispensed by Respondent Pharmacy in connection with this investigation.

17           44. Additionally, the board inspector determined that Respondent Pharmacy's own  
18 controlled substance policy gave guidance which was consistent with corresponding  
19 responsibility laws by noting:

20           "Controlled substance prescriptions are valid only if all required information is included  
21 and medication being prescribed is for a valid medical reason by an individual with authority to  
22 prescribe it."

23           45. Respondent Behdadnia, as PIC of Respondent Pharmacy, had the responsibility to  
24 ensure compliance with all state and federal laws governing pharmacy, including corresponding  
25 responsibility. Respondent Behdadnia has been a California licensed pharmacist since 1992 and,  
26 with his education, training, and experience, the principles of corresponding responsibility should  
27 have been very well known to him. This knowledge is expected to be the standard, not just with  
28

1 Respondent Behdadnia as the PIC of Respondent Pharmacy, but also with all pharmacists who  
2 work at Respondent Pharmacy.

3 46. In accordance with the laws and regulations governing the practice of pharmacy,  
4 physicians and pharmacists have corresponding responsibility when writing and dispensing  
5 controlled substance prescriptions. The following factors are some that have been determined to  
6 constitute red flags that should give a pharmacy and pharmacist inquiry notice of a potential  
7 problem with prescriptions for drugs of common abuse and invoke in them a duty of inquiry:

- 8 • Irregularities on the face of the prescription itself
- 9 • Nervous patient demeanor
- 10 • Age or presentation of patient (e.g. youthful patients seeking chronic pain  
11 medications)
- 12 • Multiple patients at the same address
- 13 • Cash payments
- 14 • Requests for early refills of prescriptions
- 15 • Prescriptions written for an unusually large quantity of drugs
- 16 • Prescriptions written for potentially duplicative drugs
- 17 • The same combinations of drugs prescribed for multiple patients
- 18 • Initial prescriptions written for strong opiates (e.g. OxyContin 80 mg)
- 19 • Long distances traveled from the patient's home, to the prescriber's office or  
20 pharmacy
- 21 • Irregularities in the prescriber's qualifications in relation to the medication(s)  
22 prescribed
- 23 • Prescriptions that are written outside of the prescriber's medical specialty
- 24 • Prescriptions for medications with no logical connection to diagnosis or treatment

25 **Oxycodone**

26 47. Oxycodone information included in the drug labeling (available on the FDA website)  
27 and is defined as an opioid used for pain. The recommended starting dose for patients not  
28 currently on opioid therapy is 5 to 15 mg every four to six hours as needed. As an opioid, it is a

1 classic example of a central nervous system (CNS) depressant. Oxycodone is available in 5, 10,  
2 15, 20, and 30 mg immediate release tablets. Patients are not meant to initiate treatment with this  
3 drug, or with any other opioids, at the highest dosage. This is standard knowledge in the practice  
4 of pharmacy. The common street value for oxycodone is one dollar per milligram, or \$30 for  
5 one (1) oxycodone 30 mg tablet.

6 48. Upon reviewing the particular records analyzed for July 31, 2017 through July 31,  
7 2020, the board inspector determined that Respondent Pharmacy dispensed a very high number of  
8 prescriptions for oxycodone 30 mg. It is unusual for a pharmacy to have oxycodone 30 mg, the  
9 highest strength available of immediate release tablets, as one of its most common drugs  
10 dispensed. Lower strengths of oxycodone are usually more represented in the usual course of  
11 professional practice. Additionally, it is irregular for Respondent Pharmacy to not have  
12 hydrocodone/APAP as one of its most commonly dispensed drugs, since such is by far the most  
13 commonly dispensed controlled substance in the country.

14 49. In furtherance of this investigation, the board inspector determined that the dispensing  
15 of oxycodone 30 mg prescriptions by respondents Pharmacy and Behdadnia stood out as a group  
16 as having the following irregularities:

- 17 • Higher percentage (over 96 percent) of oxycodone 30 mg compared to other lower  
18 strengths
- 19 • Large number of oxycodone 30 mg compared to other lower strengths

20 50. The board inspector reviewed some of the top prescribers of oxycodone 30 mg  
21 dispensed by respondents Pharmacy and Behdadnia during the query period, including the  
22 following: Bhasker Venkateswaralu, M.D. (reported to CURES as “Todd Hang, D.O.” –  
23 Respondent Pharmacy’s records on the backtag of the prescriptions listed Dr. Venkateswaralu's  
24 name, but Dr. Hang's DEA number); Dean Weiss, M.D.; and Amir Friedman, M.D. The board  
25 inspector evaluated these three prescribers' patterns of dispensing (along with a few others) by  
26 Respondents Pharmacy and Behdadnia.

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28 ///

1                   **Todd Hang, D.O./Bhasker Venkateswaralu, M.D.**

2                   51. Todd Hang, D.O. is licensed by the Osteopathic Medical Board of California as a  
3 physician and surgeon. Primary areas of practice are listed as family medicine and occupational  
4 medicine. Dr. Hang is noted as being in practice with Bhasker Venkateswaralu, M.D. on  
5 prescription documents presented to Respondent Pharmacy. The address for these prescribers is  
6 seven to ten miles from Respondent Pharmacy. The phone number preprinted on the prescription  
7 documents did not match online searches for either prescriber. The board has supplied  
8 information to pharmacists to not rely on the preprinted numbers for any verification, since they  
9 could be phony.

10                  52. The signature on these prescription documents was a wavy scribble, which gave no  
11 indication as to which prescriber signed the prescriptions. Respondent Pharmacy records on the  
12 backtag of the prescriptions listed Dr. Venkateswaralu's name, but Dr. Hang's DEA number. This  
13 seemed to have caused a conflict in the CURES and pharmacy records.

14                  53. All but one controlled substance prescribed by Dr. Hang or Dr. Venkateswaralu and  
15 dispensed by Respondents Pharmacy and Behdadnia were for oxycodone 30 mg (the highest  
16 strength immediate release tablet available).

17                  54. Eight of the 19 patients were documented as having more than one diagnosis on  
18 different dates, and 12 of the 19 were documented as having the very specific diagnosis of a right  
19 shoulder rotator cuff tear or rupture. This uniformity of diagnoses was a factor of irregularity and  
20 a red flag of illegitimacy. Additionally, several of these prescriptions were dispensed many days  
21 after being written, which could have been irregular as having no logical connection to diagnosis  
22 or treatment. Oxycodone is a potent pain medication reserved for the more severe types of acute  
23 and chronic pain. It would be irregular for many patients treated for pain to not be dispensed the  
24 medication they supposedly needed in a timely manner. Irregularities such as these require more  
25 extensive validation and resolution.

26                  55. All of the over 120 prescription documents reviewed in connection with Dr. Hang/Dr.  
27 Venkateswaralu were missing at least the following features required for controlled substance  
28 prescription security forms:

1           1.    A watermark printed on the backside of the prescription blank, which read:  
2 "California Security Prescription."

3           a.    The watermark printed on the backside of the prescription documents read  
4 "DocuGard", while a box on the back of the prescription documents indicated that a "reflective  
5 watermark on the back visible when viewed at an angle under light California Security  
6 Prescription" should be present.

7           b.    Nothing other than DocuGard was seen when viewed with a black light, rubbed  
8 with a coin, or viewed at an angle to light.

9           2.    No lot number

10          3.    No California security printer number

11          56.   The patterns presented with the controlled substances dispensed by Respondent  
12 Pharmacy, per prescriptions from Dr. Hang/Dr. Venkateswaralu, presented at least the following  
13 factors of irregularity, and contrasted with legitimate dispensing of controlled substances:

14           •    Over 120 controlled substance prescription forms were invalid

15           •    All but one of the prescriptions were for oxycodone 30 mg, the highest strength  
16 available

17           •    Cash payment for all controlled substance prescriptions

18           •    Uniformity of treatment for multiple patients receiving similar or identical controlled  
19 substances

20           •    Uniformity of diagnoses, with 12 of 19 patients noted as having the same specific  
21 right shoulder diagnosis

22           •    Some patients receiving identical prescriptions on the same days

23           •    Three sets of patients with the same addresses:

24           •    Dwight C and Samuel D

25           •    Charles B and Markia W

26           •    Fredrick H and Steven H

27           •    At least 12 of the 19 patients were not tolerant to opioids, and started or restarted on  
28 high oxycodone doses

1 • Many patients treated for pain were not dispensed the medication they supposedly  
2 needed in a timely manner

3 57. There was no indication all of these irregularities were attempted to be resolved by  
4 Respondents Pharmacy and/or Behdadnia.

5 **Dean Weiss, M.D.**

6 58. Dean Weiss, M.D. is licensed by the California Medical Board as a physician and  
7 surgeon. Primary areas of practice are listed as general medicine and pain management.  
8 Prescription documents from Dr. Weiss presented to Respondent Pharmacy listed addresses for  
9 Dr. Weiss at least 15 miles east of Respondent Pharmacy in Monterey Park, CA, and at least six  
10 (6) miles east in Los Angeles. Considering the well-known congested traffic conditions in the  
11 Los Angeles metropolitan area, this can be a red flag of illegitimacy for patients to travel these  
12 distances to a pharmacy, after passing by many other pharmacies much closer to their homes.

13 59. The board inspector determined that the patterns presented with the controlled  
14 substances dispensed, per prescriptions from Dr. Weiss, by respondents Pharmacy and Behdadnia  
15 presented at least the following factors of irregularity, and contrasted with legitimate prescribing  
16 and dispensing of controlled substances:

17 • Only two controlled substances prescribed by Dr. Weiss were dispensed by  
18 Respondents Pharmacy and Behdadnia: oxycodone 30 mg (132 prescriptions/12,270 tabs), and  
19 carisoprodol 350 mg (9 prescriptions/205 tabs)

20 • Over 93 percent of the prescriptions were for oxycodone 30 mg, the highest strength  
21 available

22 • No lower strengths of oxycodone were dispensed

23 • Uniformity of treatment for multiple patients receiving similar or identical controlled  
24 substances

25 • Some patients receiving similar or identical prescriptions on the same days

26 60. There was no indication all of these irregularities were attempted to be resolved by  
27 respondents Pharmacy and Behdadnia. The Board Inspector further determined that Respondent  
28 Behdadnia, as PIC of Respondent Pharmacy, failed in the care and treatment of most of these

1 patients by repeatedly dispensing oxycodone 30 mg to patients whose risk of harm was increased  
2 by the other medications used in their treatment.

3 **Amir Friedman, M.D.**

4 61. Amir Friedman, M.D. is licensed by the California Medical Board as a physician and  
5 surgeon. A primary area of his practice is listed as pain management. Prescription documents  
6 presented to Respondent Pharmacy listed a main address for Dr. Friedman in Encino - at least 16  
7 miles from Respondent Pharmacy. Considering the well-known congested traffic conditions in  
8 the Los Angeles metropolitan area, this is a red flag of illegitimacy for patients to travel these  
9 distances to a pharmacy, after passing by many other pharmacies much closer to their homes.

10 62. The board inspector determined that according to CURES records, the only controlled  
11 substance prescribed by Dr. Friedman and dispensed by Respondent Pharmacy during the query  
12 period (87 prescriptions) was oxycodone 30 mg.

13 63. At least 80 of the prescription documents reviewed in connection with Dr. Friedman's  
14 prescriptions were missing at least the following features required for controlled substance  
15 prescription security forms:

16 1. A watermark printed on the backside of the prescription blank, which read:  
17 "California Security Prescription."

18 a. The watermark printed on the backside of the prescription documents read  
19 "DocuGard", while a box on the back of the prescription documents indicated that a "reflective  
20 watermark on the back visible when viewed at an angle under light California Security  
21 Prescription" should be present.

22 b. Nothing other than DocuGard was seen when viewed with a black light, rubbed  
23 with a coin, or viewed at an angle to light.

24 2. No lot number

25 3. No California security printer number

26 64. The board inspector further determined that many of these prescription documents  
27 reviewed in connection with Dr. Friedman had the same diagnosis codes noted for the patients  
28 involved. In this regard, in February and March 2019 there was an influx of 14 patients who were

1 dispensed identical oxycodone 30 mg prescriptions, and 12 of the 14 had the exact same  
2 diagnosis, “ICD M75.101”, which is defined as *an unspecified rotator cuff tear or rupture of the*  
3 *right shoulder, not specified as traumatic.*

4 65. California Code of Regulations section 1707.5 states in pertinent subdivisions that  
5 labels on drug containers dispensed to patients in California must include the condition or  
6 purpose for which the drug was prescribed if the condition or purpose is indicated on the  
7 prescription. Respondent Pharmacy did not include this information on the prescription labels as  
8 required. Any reasonably prudent pharmacist would not have ignored the irregularity of multiple  
9 patients seeking medical treatment from a particular prescriber - all with the exact very specific  
10 diagnosis and being prescribed the exact same controlled substance, dose, and quantity – and each  
11 filling their prescriptions at the same pharmacy 16 miles away, often on the same days.

12 66. The patterns presented with the controlled substances dispensed, per prescriptions  
13 from Dr. Friedman, by Respondent Pharmacy presented at least the following factors of  
14 irregularity, and contrasted with legitimate prescribing and dispensing of controlled substances:

- 15 • At least 80 prescription documents in 2019 were written on invalid forms
- 16 • All of the prescriptions were for oxycodone 30 mg, the highest strength available
- 17 • Cash payment for all controlled substance prescriptions on and after 02/12/2019
- 18 • Uniformity of treatment for multiple patients receiving similar or identical controlled  
19 substances
- 20 • Vast majority of patients with the exact same specific diagnosis
- 21 • Some patients receiving identical prescriptions on the same days
- 22 • Two sets of two different patients with the same addresses dispensed identical  
23 oxycodone 30 prescriptions, and on the same days

24 67. There was no indication all of these irregularities were attempted to be resolved by  
25 Respondents Pharmacy and Behdadnia.

26 ///

27 ///

28 ///



1                   **Invalid prescriptions from other prescribers**

2                   68. In addition to the previously listed invalid prescriptions above, the follow prescription  
3 documents reviewed in connection with this investigation were also irregular and missing  
4 required security features:

- 5                   a. A prescription from Dr. Silverstein for alprazolam 2 mg – 60 tabs (RX #374247).
- 6                   b. A prescription from Dr. Quini for oxycodone 30 mg – 120 tabs (RX #344472).
- 7                   c. A prescription from Dr. Ruiz-Villalpando for oxycodone 30 mg – 120 tabs (RX  
8 #346734). Other irregularities with this prescription included an out of area prescriber, 80 miles  
9 from the pharmacy, the prescriber's city on the prescription misspelled as Parris instead of Perris,  
10 cash payment, and a high opioid starting dose.
- 11                  d. A prescription from Dr. O’Byrne for oxycodone 30 mg – 120 tabs (RX #348126).  
12 Other irregularities with this prescription included an out of area prescriber, 50 miles from the  
13 pharmacy, cash payment, and a high opioid starting dose.

14                  69. None of the above prescriptions had indication all of these irregularities were  
15 attempted to be resolved by Respondents Pharmacy and Behdadnia.

16                   **High opioid starting doses**

17                  70. As a result of this investigation, the Board Inspector further determined that there  
18 were 45 instances in which respondents Pharmacy and Behdadnia dispensed oxycodone 30 mg,  
19 and other opioids, to at least 30 different patients at dosages which were at least twice the  
20 recommended dose. In several instances the CURES reports showed the patients had not received  
21 an opioid over a time, and in an amount, which would have made appropriate dosing patients,  
22 who were not opioid tolerant, with these high doses.

23                  71. As a result of this investigation, the Board Inspector further determined that at least  
24 30 patients were dispensed unusually high doses - at least twice the recommended safe dose of  
25 oxycodone - and without any documentation of effective intervention by a pharmacist on 45  
26 different occasions. In order to start, or restart patients on at least twice the safe recommended  
27 dose of oxycodone, as was done in these situations, the pharmacist would need to independently  
28 determine the patients would not be harmed in order to fulfill their corresponding responsibility.

1 There was no evidence this was done by Respondents Pharmacy and/or Behdadnia with these  
2 patients, despite the fact that all information needed to determine the unusually high doses was  
3 included with the prescriptions at the time of dispensing and would have been apparent if  
4 effectively reviewed. A review of the subject pharmacy records found none of these high doses  
5 were addressed by respondents Pharmacy and/or Behdadnia prior to dispensing.

6 72. Respondents Pharmacy and Behdadnia did not overcome the extensive applicable  
7 dosing guidelines by simply calling for verification, and sometimes writing down a diagnosis  
8 code. These prescriptions had unresolved red flags of illegitimacy including, invalid prescription  
9 documents, high starting doses, drug interactions, and multiple patients prescribed the same  
10 medication and dose. Even if the prescriber had told Respondents Pharmacy and/or Behdadnia  
11 that the prescription was "verified", it would not have been sufficient to overcome the established  
12 risks determined by years of clinical research in thousands of different patients.

13 73. Respondents Pharmacy and Behdadnia had objective information these prescribers  
14 were not issuing controlled substance prescriptions in the usual course of professional practice,  
15 based on all of the patterns of red flags of illegitimacy, including using invalid prescription forms,  
16 excessively high doses, dangerous drug interactions, and the failure by these prescribers to  
17 effectively evaluate patients' CURES data as required by law before prescribing high opioid  
18 doses.

19 74. As a result of this investigation, the board inspector further determined that  
20 Respondents Pharmacy and Behdadnia failed to review the readily available patient and  
21 prescription records which would supply necessary information to use their best professional  
22 judgment in making appropriate dispensing decisions. CURES reports run by the pharmacy and  
23 placed into pharmacy records are included in the type of records which pharmacists would be  
24 required to review. Reasonable and prudent pharmacists would have been convinced many of  
25 prescriptions for oxycodone 30 mg were not issued in the usual course of professional practice.  
26 This would especially be the case after recognizing certain prescribers were issuing high dose  
27 opioid prescriptions to patients not tolerant to their effects. They were exactly as would be  
28 expected for illegitimate prescriptions and are the type seen from "Pill Mills," a term used to

1 describe a doctor, clinic, or pharmacy that is prescribing or dispensing powerful narcotics  
2 inappropriately or for non-medical reasons.

3 75. As a result of this investigation, the Board inspector further determined that  
4 Respondents Pharmacy and Behdadnia failed to fulfill their corresponding responsibility by  
5 repeatedly failing to resolve irregularities and red flags, and dispensing over 34,000 tablets of  
6 controlled substances.

7 76. As a result of this investigation, the Board inspector further determined that  
8 Respondent Behdadnia, as PIC of Respondent Pharmacy failed to exercise of his education,  
9 training, or experience and best professional judgment as a pharmacist by:

- 10 • Dispensing, or allowing to be dispensed, controlled substance prescriptions and  
11 ignoring, or not being aware of, objective signs of irregularity and abuse.
- 12 • Dispensing, or allowing to be dispensed, controlled substance prescriptions without  
13 ensuring they were issued for a legitimate medical purpose and in the usual course of professional  
14 practice.
- 15 • Failing to consult appropriate patient, prescription, and other records to prevent the  
16 dispensing of illegitimate prescriptions.
- 17 • Failing to review pertinent patient records such as CURES reports.
- 18 • Failing to ensure records of the dispensing pharmacist's identity were maintained.

19 **FIRST CAUSE FOR DISCIPLINE**

20 **(Violation of Corresponding Responsibility to Verify Prescriptions)**

21 77. Respondent Pharmacy is subject to disciplinary action under Code sections 4301,  
22 subdivisions (j) and (o), and 4306.5, Health and Safety Code sections 11152 and 11153,  
23 subdivision (a), Code of Federal Regulations Title 21, Part 1306, Section 04, and California Code  
24 of Regulations, title 16, section 1761, subdivisions (a) and (b). Complainant hereby incorporates  
25 paragraphs 33-76 above as though set forth in full herein.

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1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Gross Negligence)**

3 78. Respondent Pharmacy is subject to disciplinary action under Code section 4301,  
4 subdivision (c). Complainant hereby incorporates paragraphs 33-76 above as though set forth in  
5 full herein.

6 **THIRD CAUSE FOR DISCIPLINE**

7 **(Unprofessional Conduct - Clearly Excessive Furnishing of Controlled Substances)**

8 79. Respondent Pharmacy is subject to disciplinary action under Code section 4301,  
9 subdivision (d), in violation of Health and Safety Code sections 11152 and 11153, subdivision  
10 (a). Complainant hereby incorporates paragraphs 33-76 above as though set forth in full herein.

11 **FOURTH CAUSE FOR DISCIPLINE**

12 **(Unprofessional Conduct)**

13 80. Respondent Pharmacy is subject to disciplinary action under Code sections 4301,  
14 subdivisions (j) and/or (o). Complainant hereby incorporates paragraphs 33-76 above as though  
15 set forth in full herein.

16 **FIFTH CAUSE FOR DISCIPLINE**

17 **(Reporting Controlled Substance Prescriptions to CURES)**

18 81. Respondent Pharmacy is subject to disciplinary action under Code section 4301,  
19 subdivisions (j) and (o), for violating Health and Safety Code section 11165, subdivision (d), in  
20 that between July 31, 2017 and July 31, 2020, it failed to report at least 204 controlled substance  
21 prescriptions (12,284 dosage units), which included 39 controlled substance prescriptions for  
22 oxycodone 30 mg (3,640 units), to the Department of Justice. Complainant hereby incorporates  
23 paragraphs 33-76 above as though set forth in full herein.

24 **SIXTH CAUSE FOR DISCIPLINE**

25 **(Violation of Corresponding Responsibility to Verify Prescriptions)**

26 82. Respondent Behdadnia is subject to disciplinary action under Code sections 4113,  
27 4301, subdivisions (j) and (o), and 4306.5, Health and Safety Code sections 11152 and 11153  
28 subdivision (a), Code of Federal Regulations Title 21, Part 1306, Section 04, and California Code

1 of Regulations, title 16, section 1761, subdivisions (a) and (b). Complainant hereby incorporates  
2 paragraphs 33-76 above as though set forth in full herein.

3 **SEVENTH CAUSE FOR DISCIPLINE**

4 **(Unprofessional Conduct – Gross Negligence)**

5 83. Respondent Behdadnia is subject to disciplinary action under Code sections 4113 and  
6 4301, subdivision (c). Complainant hereby incorporates paragraphs 33-76 above as though set  
7 forth in full herein.

8 **EIGHTH CAUSE FOR DISCIPLINE**

9 **(Unprofessional Conduct - Clearly Excessive Furnishing of Controlled Substances)**

10 84. Respondent Behdadnia is subject to disciplinary action under Code sections 4113 and  
11 4301, subdivision (d), in violation of Health and Safety Code sections 11152 and 11153,  
12 subdivision (a). Complainant hereby incorporates paragraphs 33-76 above as though set forth in  
13 full herein.

14 **NINTH CAUSE FOR DISCIPLINE**

15 **(Unprofessional Conduct)**

16 85. Respondent Behdadnia is subject to disciplinary action under Code section 4301,  
17 subdivisions (j) and/or (o). Complainant hereby incorporates paragraphs 33-76 above as though  
18 set forth in full herein.

19 **TENTH CAUSE FOR DISCIPLINE**

20 **(Reporting Controlled Substance Prescriptions to CURES)**

21 86. Respondent Behdadnia is subject to disciplinary action under Code section 4301,  
22 subdivisions (j) and (o), for violating Health and Safety Code section 11165, subdivision (d), in  
23 that between July 31, 2017 and July 31, 2020, as PIC of Respondent Pharmacy, he failed to report  
24 at least 204 controlled substance prescriptions (12,284 dosage units), which included 39  
25 controlled substance prescriptions for oxycodone 30 mg (3,640 units), to the Department of  
26 Justice. Complainant hereby incorporates paragraphs 33-76 above as though set forth in full  
27 herein.

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1 **BOARD INVESTIGATION REPORT DATED JUNE 17, 2021**

2 87. On September 17, 2018, the Board received a complaint regarding some alleged  
3 questionable practices on the part of Respondents. In response, a Board investigation was  
4 conducted, which included an on-site inspection of Respondent Pharmacy, and an audit of all  
5 sales, returns and/or destruction of oxycodone (Oxycontin) HCL 30 mg; hydromorphone 4 mg  
6 (Dilaudid); hydrocodone/acetaminophen 7.5 mg/300 mg (Vicodin); morphine sulfate 15 mg (MS  
7 Contin), from September 17, 2017 through December 4, 2019. Thereafter, a Board Inspector  
8 made the following findings and determinations in connection with this investigation, as reflected  
9 in her Investigation Report dated June 17, 2021:

10 a. From September 17, 2017 through December 4, 2019, Respondent Pharmacy, while  
11 Respondent Behdadnia was serving as the Pharmacist-in-Charge of Respondent Pharmacy, failed  
12 to maintain the required records of acquisition and disposition to account for an inventory  
13 overage of oxycodone 30 mg totaling 22,257 tablets. In addition, no records of acquisition were  
14 available for various drug samples. Failure to have records of acquisition and disposition for  
15 dangerous drugs is a violation of Business and Professions Code, sections 4081, subdivision (a),  
16 and 4105 subdivisions (a) and (c).

17 **ELEVENTH CAUSE FOR DISCIPLINE**

18 **(Failure to Maintain Required Records)**

19 88. Respondent Pharmacy is subject to disciplinary action under Code sections 4301,  
20 subdivisions (j) and (o), and 4081, subdivision (a), in that for the period of September 17, 2017  
21 through December 4, 2019, Respondent Pharmacy failed to maintain the required records of  
22 acquisition and disposition to account for an inventory overage of oxycodone 30 mg totaling  
23 22,257 tablets. In addition, no records of acquisition were available for various drug samples.  
24 Complainant hereby incorporates paragraph 87 above as though set forth in full herein.

25 **TWELFTH CAUSE FOR DISCIPLINE**

26 **(Failure to Retain Records of Dangerous Drugs on Licensed Premises)**

27 89. Respondent Pharmacy is subject to disciplinary action under Code sections 4301,  
28 subdivisions (j) and (o), and 4105 subdivisions (a) and (c), in that for the period of September 17,

1 2017 through December 4, 2019, Respondent Pharmacy failed to retain the required records of  
2 acquisition and disposition on the licensed pharmacy premise to account for an inventory overage  
3 of oxycodone 30 mg totaling 22,257 tablets. In addition, no records of acquisition were available  
4 for various drug samples. Complainant hereby incorporates paragraph 87 above as though set  
5 forth in full herein.

6 **THIRTEENTH CAUSE FOR DISCIPLINE**

7 **(Failure to Maintain Required Records)**

8 90. Respondent Behdadnia is subject to disciplinary action under Code sections 4301,  
9 subdivisions (j) and (o), 4113, and 4081, subdivision (a), in that for the period of September 17,  
10 2017 through December 4, 2019, Respondent Behdadnia, as the Pharmacist-in-Charge of  
11 Respondent Pharmacy, failed to maintain the required records of acquisition and disposition to  
12 account for an inventory overage of oxycodone 30 mg totaling 22,257 tablets. In addition, no  
13 records of acquisition were available for various drug samples. Complainant hereby incorporates  
14 paragraph 87 above as though set forth in full herein.

15 **FOURTEENTH CAUSE FOR DISCIPLINE**

16 **(Failure to Retain Records of Dangerous Drugs and Devices on Licensed Premises)**

17 91. Respondent Behdadnia is subject to disciplinary action under Code sections 4301,  
18 subdivisions (j) and (o), 4113, and 4105 subdivisions (a) and (c), in that for the period of  
19 September 17, 2017 through December 4, 2019, Respondent Behdadnia, as the Pharmacist-in-  
20 Charge of Respondent Pharmacy, failed to retain the required records of acquisition and  
21 disposition on the licensed pharmacy premise to account for an inventory overage of oxycodone  
22 30 mg totaling 22,257 tablets. In addition, no records of acquisition were available for various  
23 drug samples. Complainant hereby incorporates paragraph 87 above as though set forth in full  
24 herein.

25 **OTHER MATTERS**

26 92. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit  
27 Number PHY 43361 issued to Century Beverly Hills Pharmacy, Inc., doing business as Century  
28 Beverly Hills Pharmacy, with Joseph Amin as 51% Shareholder, CEO, and President, and

1 Davood Behdadnia as 49% Shareholder, Secretary, then Century Beverly Hills Pharmacy, Inc.,  
2 doing business as Century Beverly Hills Pharmacy, with Joseph Amin as 51% Shareholder,  
3 CEO, and President, and Davood Behdadnia as 49% Shareholder, Secretary, shall be prohibited  
4 from serving as a manager, administrator, owner, member, officer, director, associate, or partner  
5 of a licensee for five years if Pharmacy Permit Number PHY 43361 is placed on probation or  
6 until Pharmacy Permit Number PHY 43361 is reinstated if it is revoked.

7 93. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit  
8 Number PHY 43361 issued to Century Beverly Hills Pharmacy, Inc., doing business as Century  
9 Beverly Hills Pharmacy, with Joseph Amin as 51% Shareholder, CEO, and President, and  
10 Davood Behdadnia as 49% Shareholder, Secretary, while Joseph Amin was serving as a  
11 manager, administrator, owner, member, officer, director, associate, partner, or in any other  
12 position with management or control, and had knowledge of or knowingly participated in any  
13 conduct for which the licensee was disciplined, Joseph Amin shall be prohibited from serving as  
14 a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for  
15 five years if Pharmacy Permit Number PHY 43361 is placed on probation or until Pharmacy  
16 Permit Number PHY 43361 is reinstated if it is revoked.

17 94. Pursuant to Code section 4307, if discipline is imposed on Pharmacist License  
18 Number RPH No. 45285 issued to Davood Behdadnia, Davood Behdadnia shall be prohibited  
19 from serving as a manager, administrator, owner, member, officer, director, associate, or partner  
20 of a licensee for five years if Pharmacist License Number RPH 45285 is placed on probation or  
21 until Pharmacist License Number RPH 45285 is reinstated if it is revoked.

22 95. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit  
23 Number PHY 43361 issued to Century Beverly Hills Pharmacy, Inc., doing business as Century  
24 Beverly Hills Pharmacy, with Joseph Amin as 51% Shareholder, CEO, and President, and  
25 Davood Behdadnia as 49% Shareholder, Secretary, while Davood Behdadnia was serving as a  
26 manager, administrator, owner, member, officer, director, associate, partner, or in any other  
27 position with management or control, and had knowledge of or knowingly participated in any  
28 conduct for which the licensee was disciplined, Davood Behdadnia shall be prohibited from



1 serving as a manager, administrator, owner, member, officer, director, associate, or partner of a  
2 licensee for five years if Pharmacy Permit Number PHY 43361 is placed on probation or until  
3 Pharmacy Permit Number PHY 43361 is reinstated if it is revoked.

4 **PRAYER**

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

7 1. Revoking or suspending Pharmacy Permit Number PHY 43361, issued to Century  
8 Beverly Hills Pharmacy, Inc., doing business as Century Beverly Hills Pharmacy, with Joseph  
9 Amin as 51% Shareholder, CEO, and President, and Davood Behdadnia as 49% Shareholder,  
10 Secretary;

11 2. Prohibiting Century Beverly Hills Pharmacy, Inc., doing business as Century Beverly  
12 Hills Pharmacy, with Joseph Amin as 51% Shareholder, CEO, and President, and Davood  
13 Behdadnia as 49% Shareholder, Secretary, from serving as a manager, administrator, owner,  
14 member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit  
15 Number PHY 43361, issued to Century Beverly Hills Pharmacy, Inc., doing business as Century  
16 Beverly Hills Pharmacy, with Joseph Amin as 51% Shareholder, CEO, and President, and  
17 Davood Behdadnia as 49% Shareholder, Secretary, is placed on probation or revoked;

18 3. Revoking or suspending Pharmacist License Number 45285 issued to Davood  
19 Behdadnia;

20 4. Prohibiting Davood Behdadnia from serving as a manager, administrator, owner,  
21 member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit  
22 Number PHY 43361, issued to Century Beverly Hills Pharmacy, Inc., doing business as Century  
23 Beverly Hills Pharmacy, with Joseph Amin as 51% Shareholder, CEO, and President, and  
24 Davood Behdadnia as 49% Shareholder, Secretary, is placed on probation or revoked;

25 5. Prohibiting Davood Behdadnia from serving as a manager, administrator, owner,  
26 member, officer, director, associate, or partner of a licensee for five years if Pharmacist License  
27 Number RPH 45285 issued to Davood Behdadnia is placed on probation or revoked;

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6. Ordering respondents Pharmacy and Behdadnia 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,

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

DATED: 5/5/2022

Signature on File \_\_\_\_\_

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