

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

**In the Matter of the Petitions for Early Termination of
Probation of:**

**ARDEN MEDICAL PHARMACY,
Pharmacy Permit No. PHY 53636;**

and

**KAMBIZ FARZAMDOOST,
Pharmacist License No. RPH 48839,**

Petitioners.

Agency Case No. 7229

OAH No. 2025110808

DECISION AND ORDER

On February 13, 2026, the Board of Pharmacy, Department of Consumer Affairs, adopted the attached Decision as its own. The Petition for Early Termination of Probation filed by Arden Medical Pharmacy is GRANTED. The Petition for Early Termination of Probation filed by Kambiz Farzamdoost is DENIED.

This Decision shall become effective at 5:00 p.m. on April 1, 2026.

It is so ORDERED on March 2, 2026.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By



Seung W. Oh, Pharm.D.
Board President

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

**In the Matter of the Petitions for Early Termination of
Probation of:**

**ARDEN MEDICAL PHARMACY and KAMBIZ FARZAMDOOST,
Petitioners**

Agency Case No. 7229

OAH No. 2025110808

PROPOSED DECISION

This matter was heard by videoconference before a quorum of the Disciplinary Petition Committee of the California State Board of Pharmacy (Board) in Sacramento, California, on December 3, 2025. Jennevee H. de Guzman, Administrative Law Judge, Office of Administrative Hearings, presided.¹

¹ After hearing, the Committee deliberated in closed session. Judge de Guzman drafted this Proposed Decision in accordance with the Committee's instructions, and she played no role in deciding the substance (outcome) of this matter.

Kristina T. Jarvis, Deputy Attorney General, appeared pursuant to Government Code section 11522.

Petitioner Kambiz Farzamdoost represented Arden Medical Pharmacy and himself (petitioners, collectively).

Evidence was received, the record closed, and the matter submitted for decision on December 3, 2025.

FACTUAL FINDINGS

Background and Procedural History

1. On August 15, 1996, the Board issued petitioner Kambiz Farzamdoost (petitioner Farzamdoost) Pharmacist License No. RPH 48839. The pharmacist license will expire on July 31, 2026, unless renewed. On September 29, 2015, the Board issued petitioner Arden Medical Pharmacy (Arden Medical) Pharmacy License No. PHY 53636. The pharmacy license will expire on September 1, 2026, unless renewed. Petitioner Farzamdoost has been Arden Medical's president, sole shareholder, chief executive officer, director, secretary, treasurer/financial officer, and pharmacist in charge (PIC) since September 29, 2015.

2. On June 30, 2022, the Board's Executive Officer signed and thereafter filed an Accusation against petitioners. The Accusation alleged cause to discipline petitioners' licenses for failing to exercise corresponding responsibility. The Accusation also alleged cause to discipline petitioner Farzamdoost's license for unprofessional conduct.

3. The causes for discipline arose from a Board inspector's 2021 review of Arden Medical's electronic data for prescriptions dispensed from February 2017 through February 2021. Based on the Board inspector's review, the Accusation alleged petitioners dispensed prescriptions for controlled substances that exhibited objective factors of irregularity indicating they were not written for legitimate medical purposes.

4. Specifically, the Accusation alleged that (1) prescriptions for Oxycodone, a strong opioid, were dispensed as an initial treatment, at a concerning dosage, to patients who appeared opioid naïve or non-tolerant; (2) petitioner Farzamdoost accessed CURES data but did not utilize it to evaluate the appropriateness of dosage for the patients according to recommendations and guidelines available and accessible to pharmacists; (3) eight patients who appeared to be Benzodiazepine naïve were dispensed the highest dosage of Alprazolam as an initial treatment ; (4) nearly every prescription was paid in cash; (5) at least three patients had addresses greater than 20 miles away from Arden Medical; and (6) the prescriptions were provided by the same three prescribers whose prescribing profiles showed patterns of irregularities.

5. Effective July 5, 2023, Arden Medical entered into a Stipulated Settlement and Disciplinary Order with the Board admitting the truth of each allegation in the Accusation. The pharmacy license was revoked, the revocation stayed, and the pharmacy license placed on probation for five years under various terms and conditions. Probation conditions included submitting quarterly reports, paying the Board \$17,837, jointly with petitioner Farzamdoost, in investigation and prosecution costs, paying probation monitoring costs, notifying all pharmacy employees of the probation terms and conditions, providing signed and dated statements from its owners stating they have read and are familiar with state and federal pharmacy laws and regulations, and retaining an independent consultant.

6. Effective July 7, 2023, petitioner Farzamdoost entered into a Stipulated Settlement and Disciplinary Order with the Board admitting the truth of each allegation in the Accusation. Petitioner Farzamdoost's license was revoked, the revocation stayed, and his license placed on probation for five years under various terms and conditions. Probation conditions included submitting quarterly reports, restricting petitioner Farzamdoost's supervision and oversight of licensed facilities, paying the Board \$17,837, jointly with Arden Medical, in investigation and prosecution costs, paying probation monitoring costs, and completing six hours of remedial education per year of probation and an ethics course before the end of the second year of probation.

Conduct on Probation

7. Arden Medical's probation started on July 5, 2023, and is anticipated to terminate in July 2028. As of hearing, Arden Medical has fully complied with all probation conditions.

8. Petitioner Farzamdoost's probation started on July 7, 2023, and is anticipated to terminate in July 2028. As of hearing, he has fully complied with all probation conditions.

Petitions for Early Termination of Probation

9. On August 19, 2025, the Board received Arden Medical's and petitioner Farzamdoost's respective Petition for Early Termination of Probation (Petitions). Petitioners submitted documentary evidence in support of the Petitions, including proof of continuing education and letters of support. Petitioner Farzamdoost also testified at the hearing.

PETITIONER FARZAMDOOST'S TESTIMONY

10. Prior to purchasing Arden Medical, petitioner worked for a corporate pharmacy. In this setting, petitioner Farzamdoost explained the corporation screened prescriptions for red flags, while its pharmacists focused on filling as many prescriptions as possible. Petitioner Farzamdoost explained corporations promote this culture by basing bonuses on the number of filled prescriptions. Consequently, he explained he lacked experience screening for red flags when he purchased Arden Medical Pharmacy.

11. Prior to his discipline, petitioner Farzamdoost described himself as a "trustful" and "overconfident" pharmacy owner and PIC who lacked "stern oversight" over pharmacy operations. He stated the disciplinary process has been the most difficult and humbling, yet important, experience of his life. Petitioner Farzamdoost acknowledged his lapse of judgment and leadership resulted in "significant failures" as a pharmacy owner and PIC. He stated he takes full responsibility for his actions. After reflecting on his actions, Petitioner Farzamdoost stated he realized compliance and accountability are components of a leadership mindset. He credits his education courses for his understanding of the "bigger picture in preventing harm" and that corresponding responsibility is a moral obligation. Petitioner Farzamdoost stated he is a changed pharmacist as a result of his discipline, and it has caused him to "become a better human being."

12. Petitioner Farzamdoost explained he has made significant changes to his dispensing operations with the guidance of Arden Medical's independent consultant. He explained he intends to retain the consultant on a yearly basis even after probation is terminated to ensure "everything is correct." Petitioner Farzamdoost stated he has built a more structured and rigorous dispensing procedure, which includes CURES

reviews, payment method analytics, and clinical appropriateness determinations. He stated everything is “double checked” for patient safety. As an example, petitioner Farzamdoost shared an incident from earlier this year involving a pediatric antibiotic prescription. He stated he noticed the dosage appeared “really high” and double checked the patient’s age, weight, and diagnosis. Petitioner Farzamdoost spoke to the prescriber’s staff, and they discovered an error. The erroneous dosage could have resulted in a seizure.

13. Petitioner Farzamdoost explained maintaining relationships with pharmacy benefit managers (PBMs) is financially critical for small pharmacies. He explained Arden Medical is scheduled for recredentialing with CVS and is concerned about the outcome due to Arden Medical’s and his probation status.

LETTERS OF SUPPORT

14. Petitioners submitted four letters of support, all of which were verified by Board staff. These include letters of support by Board-licensed pharmacists Greg LeGore and Robert Hartooni and private citizens Dr. David Boghossian and Dr. Vigen Khojayan.

15. Mr. LeGore and Mr. Hartooni have known petitioner Farzamdoost on a professional and personal level for over two decades. Mr. LeGore represented he is aware of the circumstances underlying petitioner Farzamdoost’s discipline, but has no knowledge of the imposed discipline. He described petitioner Farzamdoost as a “role model” who prioritizes patient care and is dedicated to the profession. Mr. LeGore believes petitioner Farzamdoost upholds the standards of corresponding responsibility. Mr. Hartooni represented he is aware of petitioner Farzamdoost’s

discipline. He described petitioner Farzamdoost as a responsible and compassionate pharmacist.

16. Dr. Boghossian and Dr. Khojayan know petitioner Farzamdoost on a professional level. They are each unaware of the Board-imposed discipline against him. Since 2015, Dr. Boghossian has observed petitioner Farzamdoost's professionalism and integrity. He recalled an instance when he asked petitioner Farzamdoost to fill his wife's prescription but did not have the prescription on hand. Petitioner Farzamdoost declined to fill the prescription despite having known Dr. Boghossian for decades. Dr. Khojayan believes petitioner Farzamdoost is an asset to the community because of his "honesty, integrity, and overall character."

Analysis

17. When considering a petition for early termination of probation, the Board may consider the following relevant factors: petitioner's activities since the disciplinary action was taken; the offense for which the petitioner was disciplined; and petitioner's documented rehabilitative efforts. (Bus. & Prof. Code, § 4309, subd. (d).) In its deliberations, the Committee considered the relevant factors set forth in Business and Professions Code section 4309, subdivision (d).

18. The Committee granted Arden Medical's petition and denied petitioner Farzamdoost's petition. The Committee reasoned that petitioner Farzamdoost's underlying misconduct was extremely serious. The opioid epidemic has been a long-standing problem in this country. Petitioner Farzamdoost's blatant disregard of numerous red flags amounted to egregious conduct, and additional monitoring is required to ensure public safety. The Committee, however, recognized petitioner Farzamdoost is on the path towards rehabilitation. He expressed insight regarding his

actions and has changed the pharmacy's internal procedures to guard against dispensing improper prescriptions. The Committee determined this evidence sufficiently demonstrated Arden Medical's rehabilitation. Consequently, the Committee agreed the most effective way to continue monitoring petitioner Farzamdoost's progress towards rehabilitation and ensure public safety, while allowing Arden Medical to continue serving its community, is to grant Arden Medical's petition and deny petitioner Farzamdoost's petition.

LEGAL CONCLUSIONS

1. A licensee on probation for a period of three years or more may petition for early termination of probation after at least two years have elapsed from the effective date of the decision ordering disciplinary action. (Bus. & Prof. Code, § 4309, subd. (a)(2).) Here, more than two years have elapsed since Arden Medical and petitioner Farzamdoost were placed on probation. Thus, the Petitions are timely.

2. "The petition shall state any facts required by the board, and the petition shall be accompanied by two or more verified recommendations from holders of licenses issued by the board to which the petition is addressed, and two or more recommendations from citizens, each having personal knowledge of the disciplinary penalty imposed by the board and the activities of the petitioner since the disciplinary penalty was imposed." (Bus. & Prof. Code, § 4309, subd. (b).) Here, petitioners have offered at least two verified recommendations from Board licensees and citizens that meet the above-mentioned criteria. Thus, the Petitions may be considered on their merits.


3. Petitioners bear the burden of proving sufficient rehabilitation to support their requests for early termination of probation. (See *Flanzer v. Bd. of Dental Examiners* (1990) 220 Cal.App.3d 1392, 1398, citing *Housman v. Bd. of Medical Examiners* (1948) 84 Cal.App.2d 308, 315.) The standard of proof is clear and convincing evidence to a reasonable certainty. (*Hippard v. State Bar* (1989) 49 Cal.3d 1084, 1091–1092; *Feinstein v. State Bar* (1952) 39 Cal.2d 541.) “Clear and convincing evidence requires a finding of high probability. The evidence must be so clear as to leave no substantial doubt. It must be sufficiently strong to command the unhesitating assent of every reasonable mind.” (*In re David C.* (1984) 152 Cal.App.3d 1189, 1208.)

4. As set forth in Factual Finding 18, Arden Medical has provided clear and convincing evidence of sufficient and meaningful rehabilitation. Petitioner Farzamdoost, however, failed to meet his burden given the severity of his actions and necessity for additional monitoring. Consequently, protection of public health, safety, and welfare requires continued monitoring of petitioner Farzamdoost.

ORDER

Arden Medical Pharmacy’s Petition for Early Termination of Probation is GRANTED. Petitioner Kambiz Farzamdoost’s Petition for Early Termination of Probation is DENIED.

DATE: December 29, 2025


Jennevee H. de Guzman (Dec 29, 2025 11:50:14 PST)

JENNEVEE H. DE GUZMAN

Administrative Law Judge

Office of Administrative Hearings

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

In the Matter of the Accusation Against:

**ARDEN DRUGS INC. DBA ARDEN MEDICAL PHARMACY,
KAMBIZ FARZAMDOOST**

Pharmacy Permit No. PHY 53636,

and

KAMBIZ FARZAMDOOST,

Pharmacist License No. PHY 48839

Respondents.

Agency Case No. 7229

OAH No. 2022100250

DECISION AND ORDER

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

This Decision shall become effective at 5:00 p.m. on July 7, 2023.

It is so ORDERED on June 7, 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, sweeping initial "S".

Seung W. Oh, Pharm.D.
Board President

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

12
13 In the Matter of the Accusation Against:

14 **ARDEN DRUGS INC. DBA**
ARDEN MEDICAL PHARMACY,
15 **KAMBIZ FARZAMDOOST**
435 Arden Avenue, Suite 110
16 Glendale, CA 91203-1130

17 **Pharmacy Permit No. PHY 53636**

18 **and**

19 **KAMBIZ FARZAMDOOST**
18034 Medley Dr.
20 Encino, CA 91316

21 **Pharmacist License No. RPH 48839**

22 Respondents.

Case No. 7229

OAH No. 2022100250

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER AS TO
PHARMACIST KAMBIZ
FARZAMDOOST, PHARMACIST
LICENSE NO. RPH 48839 ONLY**

23
24 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
25 entitled proceedings that the following matters are true:

26 **PARTIES**

27 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy
28 (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 Sheronda L. Edwards, Deputy
2 Attorney General.

3 2. Respondent Kambiz Farzamdoost is represented in this proceeding by attorney
4 Herbert L. Weinberg, Esq., whose address is: 1990 South Bundy Drive, Suite 777, Los Angeles,
5 California 90025.

6 3. On or about August 15, 1996, the Board issued Pharmacy License No. RPH 48839 to
7 Respondent Pharmacist-in-Charge Kambiz Farzamdoost (Respondent). The Pharmacist License
8 was in full force and effect at all times relevant to the charges brought in Accusation No. 7229,
9 and will expire on July 31, 2024, unless renewed. Respondent is and has been the Pharmacist-in-
10 Charge, Chief Executive Officer, President, 100 percent Shareholder, Treasurer, Chief Financial
11 Officer, and Secretary of Arden Drugs Inc. dba Arden Medical Pharmacy since September 29,
12 2015.

13 **JURISDICTION**

14 4. Accusation No. 7229 was filed before the Board and is currently pending against
15 Respondent. The Accusation and all other statutorily required documents were properly served on
16 Respondent on July 1, 2022. Respondent timely filed its Notice of Defense contesting the
17 Accusation.

18 5. A copy of Accusation No. 7229 is attached as Exhibit A and incorporated herein by
19 reference.

20 **ADVISEMENT AND WAIVERS**

21 6. Respondent has carefully read, fully discussed with counsel, and understands the
22 charges and allegations in Accusation No. 7229. Respondent has also carefully read, fully
23 discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary
24 Order.

25 7. Respondent is fully aware of his legal rights in this matter, including the right to a
26 hearing on the charges and allegations in the Accusation; the right to confront and cross-examine
27 the witnesses against him; the right to present evidence and to testify on his own behalf; the right
28 to the issuance of subpoenas to compel the attendance of witnesses and the production of

1 documents; the right to reconsideration and court review of an adverse decision; and all other
2 rights accorded by the California Administrative Procedure Act and other applicable laws.

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

5 **CULPABILITY**

6 9. Respondent admits the truth of each and every charge and allegation in Accusation
7 No. 7229.

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

10 **CONTINGENCY**

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

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

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

1 Failure to submit timely reports in a form as directed shall be considered a violation of
2 probation. Any period(s) of delinquency in submission of reports as directed may be added to the
3 total period of probation. Moreover, if the final probation report is not made as directed,
4 probation shall be automatically extended until such time as the final report is made and accepted
5 by the Board.

6 **3. Interview with the Board**

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

12 **4. Cooperate with Board Staff**

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

19 **5. Continuing Education**

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

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

23 During the period of probation, Respondent shall notify all present and prospective
24 employers of the Decision in case number 7229 and the terms, conditions, and restrictions
25 imposed on Respondent by the Decision, as follows:

26 Within thirty (30) days of the effective date of this Decision, and within ten (10) days of
27 undertaking any new employment, Respondent shall report to the Board in writing the name,
28 physical address, and mailing address of each of his employer(s), and the name(s) and telephone

1 number(s) of all of his direct supervisor(s), as well as any pharmacist(s)-in-charge, designated
2 representative(s)-in-charge, responsible manager, or other compliance supervisor(s) and the work
3 schedule, if known. Respondent shall also include the reason(s) for leaving the prior employment.
4 Respondent shall sign and return to the Board a written consent authorizing the Board or its
5 designee to communicate with all of Respondent's employer(s) and supervisor(s), and authorizing
6 those employer(s) or supervisor(s) to communicate with the Board or its designee, concerning
7 Respondent's work status, performance, and monitoring. Failure to comply with the requirements
8 or deadlines of this condition shall be considered a violation of probation.

9 Within thirty (30) days of the effective date of this Decision, and within fifteen (15) days of
10 Respondent undertaking any new employment, Respondent shall cause (a) his direct supervisor,
11 (b) his pharmacist-in-charge, designated representative-in-charge, responsible manager, or other
12 compliance supervisor, and (c) the owner or owner representative of his employer, to report to the
13 Board in writing acknowledging that the listed individual(s) has/have read the Decision in case
14 number 7229, and terms and conditions imposed thereby. If one person serves in more than one
15 role described in (a), (b), or (c), the acknowledgment shall so state. It shall be the Respondent's
16 responsibility to ensure that these acknowledgment(s) are timely submitted to the Board. In the
17 event of a change in the person(s) serving the role(s) described in (a), (b), or (c) during the term
18 of probation, Respondent shall cause the person(s) taking over the role(s) to report to the Board in
19 writing within fifteen (15) days of the change acknowledging that he or she has read the Decision
20 in case number 7229, and the terms and conditions imposed thereby.

21 If Respondent works for or is employed by or through an employment service, Respondent
22 must notify the person(s) described in (a), (b), and (c) above at every entity licensed by the Board
23 of the Decision in case number 7229, and the terms and conditions imposed thereby in advance of
24 Respondent commencing work at such licensed entity. A record of this notification must be
25 provided to the Board upon request.

26 Furthermore, within thirty (30) days of the effective date of this Decision, and within fifteen
27 (15) days of Respondent undertaking any new employment by or through an employment service,
28 Respondent shall cause the person(s) described in (a), (b), and (c) above at the employment

1 service to report to the Board in writing acknowledging that he or she has read the Decision in
2 case number 7229, and the terms and conditions imposed thereby. It shall be Respondent's
3 responsibility to ensure that these acknowledgment(s) are timely submitted to the Board.

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

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

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

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

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

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

17 During the period of probation, Respondent shall not supervise any intern pharmacist or
18 serve as a consultant to any entity licensed by the Board. Respondent may be a pharmacist-in-
19 charge, designated representative-in-charge, responsible manager, or other compliance supervisor
20 of any single entity licensed by the Board, but only if Respondent or that entity retains, at their
21 expense, an independent consultant who shall be responsible for reviewing the operations of the
22 entity on a frequency basis to be determined by the Board or its designee for compliance by
23 Respondent and the entity with state and federal laws and regulations governing the practice of
24 the entity, and compliance by Respondent with the obligations of his supervisory position.
25 Respondent may serve in such a position at only one entity licensed by the Board, only upon
26 approval by the Board or its designee. Any such approval shall be site specific. The consultant
27 shall be a pharmacist licensed by and not on probation with the Board who has been approved by
28 the Board or its designee to serve in this position. Respondent shall submit the name of the

1 proposed consultant to the Board or its designee for approval within thirty (30) days of the
2 effective date of the Decision or prior to the assumption of duties allowed in this term.

3 Assumption of any unauthorized supervision responsibilities shall be considered a violation of
4 probation. In addition, failure to timely seek approval for, timely retain or ensure timely reporting
5 by the consultant shall be considered a violation of probation.

6 **9. Reimbursement of Board Costs**

7 As a condition precedent to successful completion of probation, Respondent shall be jointly
8 and severally responsible with Respondent Arden Drugs Inc. dba Arden Medical Pharmacy,
9 Kambiz Farzamdoost, to pay the Board its costs of investigation and prosecution in the amount of
10 \$17,837. Respondent shall make said payments monthly to commence within thirty (30) days of
11 the effective date of this Decision pursuant to the following terms.

12 There shall be no deviation from this schedule absent prior written approval by the Board or
13 its designee. Failure to pay costs by the deadline(s) as directed shall be considered a violation of
14 probation.

15 Respondent shall be permitted to pay these costs in a payment plan approved by the Board
16 or its designee, so long as full payment is completed no later than three (3) years prior to the end
17 date of probation.

18 **10. Probation Monitoring Costs**

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

23 **11. Status of License**

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

28 ///

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

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

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

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

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

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

28 ///

1 If Respondent does not practice as a Pharmacist in California for the minimum number of
2 hours in any calendar month for any reason (including vacation), Respondent shall notify the
3 Board in writing within ten (10) days of the conclusion of that calendar month. This notification
4 shall include at least: the date(s), location(s), and hours of last practice; the reason(s) for the
5 interruption or reduction in practice; and the anticipated date(s) on which Respondent will resume
6 practice at the required level. Respondent shall further notify the Board in writing within ten (10)
7 days following the next calendar month, during which Respondent practices as a Pharmacist in
8 California for a minimum of 100 hours. Any failure to timely provide such notification(s) shall be
9 considered a violation of probation.

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

14 **14. Violation of Probation**

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

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

28 ///

1 **15. Remedial Education**

2 Within sixty (60) days of the effective date of this Decision, Respondent shall submit to the
3 Board or its designee, for prior approval, an appropriate program of remedial education fifty (50)
4 percent in-person or livestream related to the underlying violations charged in the accusation. The
5 program of remedial education shall consist of at least six (6) hours per year of probation at
6 Respondent’s own expense. The first year of remedial education must include completion of the
7 Board’s Prescription Drug Abuse Prevention Training. All remedial education shall be in addition
8 to, and shall not be credited toward, continuing education (CE) courses used for license renewal
9 purposes for pharmacists.

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

14 Following the completion of each course, the Board or its designee may require the
15 Respondent, at his own expense, to take an approved examination to test the Respondent’s
16 knowledge of the course. If the Respondent does not achieve a passing score on the examination,
17 that course shall not count towards satisfaction of this term. Respondent shall take another course
18 approved by the Board in the same subject area.

19 **16. Ethics Course**

20 Within sixty (60) calendar days of the effective date of this Decision, Respondent shall
21 enroll in a course in ethics, at Respondent’s expense, approved in advance by the Board or its
22 designee that complies with Title 16 California Code of Regulations section 1773.5. Respondent
23 shall provide proof of enrollment upon request. Within five (5) days of completion, Respondent
24 shall submit a copy of the certificate of completion to the Board or its designee. Failure to timely
25 enroll in an approved ethics course, to initiate the course during the first year of probation, to
26 successfully complete it before the end of the second year of probation, or to timely submit proof
27 of completion to the Board or its designee, shall be considered a violation of probation.

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17. No Ownership or Management of Licensed Premises

Respondent shall not acquire any new ownership, legal or beneficial interest nor serve as a manager, administrator, member, officer, director, trustee, associate, or partner of any additional business, firm, partnership, or corporation licensed by the Board. If Respondent currently owns or has any legal or beneficial interest in or serves as a manager, administrator, member, officer, director, trustee, associate, or partner of any business, firm, partnership, or corporation currently or hereinafter licensed by the Board, Respondent may continue to serve in such capacity or hold that interest, but only to the extent of that position or interest as of the effective date of this Decision. Violation of this restriction shall be considered a violation of probation.

18. Completion of Probation

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

ACCEPTANCE

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

DATED: 4/10/2023 
KAMBIZ FARZAMDOOST
Respondent

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

DATED: 4/10/2023 
HERBERT L. WEINBERG, ESQ.
Attorney for Respondent

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ENDORSEMENT

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

DATED: _____

Respectfully submitted,

ROB BONTA
Attorney General of California
SHAWN P. COOK
Supervising Deputy Attorney General

SHERONDA L. EDWARDS
Deputy Attorney General
Attorneys for Complainant

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ENDORSEMENT

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

DATED: April 10, 2023

Respectfully submitted,
ROB BONTA
Attorney General of California
SHAWN P. COOK
Supervising Deputy Attorney General

Sheronda Edwards
SHERONDA L. EDWARDS
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 7229

1 ROB BONTA
Attorney General of California
2 SHAWN P. COOK
Supervising Deputy Attorney General
3 SHERONDA L. EDWARDS
Deputy Attorney General
4 State Bar No. 225404
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6296
6 Facsimile: (916) 731-2126
E-mail: Sheronda.Edwards@doj.ca.gov
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

Case No. 7229

13 **ARDEN DRUGS INC. DBA**
14 **ARDEN MEDICAL PHARMACY,**
15 **KAMBIZ FARZAMDOOST**
435 Arden Avenue, Suite 110
Glendale, CA 91203-1130

ACCUSATION

16 **Pharmacy Permit No. PHY 53636,**

17 **and**

18 **KAMBIZ FARZAMDOOST**
19 **18034 Medley Dr.**
Encino, CA 91316

20 **Pharmacist License No. RPH 48839,**

21 Respondents.
22

23
24 **PARTIES**

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

27 2. On or about September 29, 2015, the Board of Pharmacy issued Permit Number PHY
28 53636 to Arden Drugs Inc. dba Arden Medical Pharmacy, Kambiz Farzamdoost (Respondent

1 Arden Pharmacy). The Permit was in full force and effect at all times relevant to the charges
2 brought herein and will expire on September 1, 2022, unless renewed.

3 3. On or about August 15, 1996, the Board of Pharmacy issued Pharmacist License
4 Number RPH 48839 to Kambiz Farzamdoost (Respondent Farzamdoost). The Pharmacist License
5 was in full force and effect at all times relevant to the charges brought herein and will expire on
6 July 31, 2022, unless renewed.

7 **JURISDICTION**

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

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

14 6. Section 4300 of the Code states:

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

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

19 (1) Suspending judgment.

20 (2) Placing him or her upon probation.

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

22 (4) Revoking his or her license.

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

25 ...

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

1 section, and where the person has been given notice of the proceeding as required by
2 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the Government
3 Code. The authority to proceed as provided by this subdivision shall be in addition to
4 the board's authority to proceed under Section 4339 or any other provision of law.

5 **BUSINESS AND PROFESSIONS CODE PROVISIONS**

6 10. Section 4021 of the Code states:

7 "Controlled substance" means any substance listed in Chapter 2 (commencing
8 with Section 11053) of Division 10 of the Health and Safety Code.

9 11. Section 4022 of the Codes states:

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

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

14 ...

15 12. Section 4113 of the Code states:

16 ...

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

19 13. Section 4156 of the Code states:

20 A pharmacy corporation shall not do, or fail to do, any act where doing or failing
21 to do the act would constitute unprofessional conduct under any statute or regulation.
22 In the conduct of its practice, a pharmacy corporation shall observe and be bound by
23 the laws and regulations that apply to a person licensed under this chapter.

24 14. Section 4301 of the Code states:

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

28 ...

(c) Gross negligence.

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

...

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

3 ...

4 (o) Violating or attempting to violate, directly or indirectly, or assisting in or
5 abetting the violation of or conspiring to violate any provision or term of this chapter
6 or of the applicable federal and state laws and regulations governing pharmacy,
7 including regulations established by the board or by any other state or federal
8 regulatory agency.

9 ...

10 15. Section 4306.5 of the Code states:

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

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

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

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

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

27 **HEALTH AND SAFETY CODE PROVISIONS**

28 16. Section 11153 of the Code states:

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

1 with controlled substances, sufficient to keep him or her comfortable by maintaining
2 customary use.

3 ...

4 **STATE REGULATORY PROVISION**

5 17. Section 1761 of the California Code of Regulations, title 16, states:

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

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

14 **COST RECOVERY**

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

19 **DRUG CLASSIFICATIONS**

20 BRAND NAME	21 GENERIC NAME	22 DANGEROUS DRUG PER B&PC § 4022	23 CONTROLLED SUBSTANCE PER H&SC	24 INDICATIONS FOR USE
25 Xanax	Alprazolam	Yes	Yes – Schedule IV, H&SC § 11057(d)(1)	Anxiety
26 Percolone/ Roxicodone	Oxycodone	Yes	Yes – Schedule II, H&SC § 11055(b)(1)(M)	Pain

27 **FACTUAL ALLEGATIONS**

28 *Board Contact with Respondent Farzamdoost*

19. On February 24, 2021, a Board inspector e-mailed Respondent Farzamdoost a request for electronic data for all prescriptions dispensed from February 24, 2017 to February 24, 2021, and a request to complete a statement form. Subsequently, on March 9, 2021, the inspector received Respondent Arden Pharmacy's electronic dispensing data in four separate Excel files.

1 Respondent Farzamdoost also submitted an attestation that the computer software was the
2 primary source of recordkeeping and was a true and accurate representation of the hardcopy
3 prescription record.

4 20. On April 1, 2021, pursuant to a second request, the inspector received 48 original
5 prescription documents from Respondent Farzamdoost, and the inspector acknowledged receipt
6 by sending an official receipt for the documents. Later, the inspector received Respondent
7 Farzamdoost's completed questionnaire and self-assessment.

8 *The Board's Analysis of Pharmacy Records*

9 21. The Board's investigation revealed that from February 24, 2017 to February 24, 2021,
10 Respondents dispensed 40 Schedule II controlled substance prescriptions in the presence of
11 significant factors of irregularity, suggesting the prescriptions were not legitimately written.
12 Objective factors indicating these prescriptions were not written for legitimate medical purposes
13 include the following:

14 (a) All 40 prescriptions were written for a strong opioid, Oxycodone, and dispensed as
15 an initial treatment to patients who appeared to be opioid naïve or opioid non-
16 tolerant.

17 (b) There was evidence the pharmacist accessed CURES¹ data before filling a
18 prescription; however, it did not appear the pharmacist utilized this tool to evaluate
19 the appropriateness of dosage for the patients according to recommendations and
20 guidelines available and accessible to pharmacists.

21 (c) At least eight (8) of these patients were also dispensed the highest dosage of
22 Alprazolam as an initial treatment to patients who appeared to be naïve to
23

24 ¹ The Controlled Substance Utilization Review and Evaluation System (CURES) is California's
25 Prescription Drug Monitoring Program (PDMP). Pharmacies in California are required to report all filled
26 prescriptions for Schedule II, III, and IV controlled substances to the database every week. The data is
27 collected statewide and can be used by licensed prescribers and pharmacists to evaluate and determine
28 whether their patients are utilizing controlled substances correctly, and whether a patient has used multiple
prescribers and multiple pharmacies to fill controlled substance prescriptions. Law enforcement and
regulatory agencies, such as the Board, have access to the CURES database for official oversight or
investigatory purposes.

1 Benzodiazepine. This drug combination was a significant risk of serious or even
2 life-threatening adverse effects.

3 (d) All 40 prescriptions were prescribed for a starting opioid dosage of 90 MME/day² or
4 more.

5 (e) Nearly every prescription was paid in cash.

6 (f) At least three (3) patients had an address greater than 20 miles away from the
7 pharmacy, which was a long distance.

8 22. Also, Dr. MG, Dr. JMK, and Dr. DHW were the prescribers of the prescriptions
9 described above. Despite numerous objective factors suggesting these prescriptions were not
10 legitimately prescribed, Respondents continued to dispense commonly abused controlled
11 substances from these prescribers. In total, Respondents dispensed at least approximately 37,550
12 tablets of Oxycodone 30 mg and 630 tablets of Alprazolam 2 mg of prescriptions prescribed by
13 these prescribers. The prescribing profiles of these prescribers show patterns of irregularity,
14 including the following:

15 (a) Oxycodone 30 mg was the only opioid prescribed by each prescriber.

16 (b) Each patient received at least one Oxycodone 30 mg prescription.

17 (c) The majority of prescriptions showed cash payment.

18 (d) There were at least eleven (11) mutual patients among them.

19 23. Although Dr. MG did not authorize the prescriptions in 2019, Respondents furnished
20 dangerous drugs without confirming the order for a legitimate medical purpose described as
21 follows:

22 (a) 162 prescriptions for Oxycodone 30 mg (total of approximately 18,780 tablets);

23 (b) 21 prescriptions for Alprazolam 2 mg (total of approximately 870 tablets);

24 (c) 231 prescriptions for some non-controlled substances.

25
26 _____
27 ² According to the Centers for Disease Control and Prevention (CDC), higher opioid doses are
28 associated with a higher risk of overdose and death. The concept of Morphine Milligram Equivalent (MME) has come into everyday use to facilitate dosing decisions. The CDC guidelines recommend caution when prescribing opioids at any dosage. Doses above 90 MME/day (60 mg/day of Oxycodone) should be avoided or carefully justified and titrated accordingly.

1 **OTHER MATTERS**

2 27. Pursuant to section 4307 of the Code, if discipline is imposed on Pharmacy Permit
3 Number PHY 53636 issued to Arden Drugs Inc., dba Arden Medical Pharmacy, Kambiz
4 Farzamdoost shall be prohibited from serving as a manager, administrator, owner, member, officer,
5 director, associate, partner, or any other person with management or control of a licensee for five
6 years if Pharmacy Permit Number PHY 53636 is placed on probation or until Pharmacy Permit
7 Number PHY 53636 is reinstated if it is revoked.

8 28. Pursuant to section 4307 of the Code, if discipline is imposed on Pharmacy Permit
9 Number PHY 53636, issued to Arden Drugs Inc., dba Arden Medical Pharmacy, Kambiz
10 Farzamdoost, for conduct that occurred while Respondent Farzamdoost, Pharmacist-in-Charge,
11 Chief Executive Officer, President, 100% Shareholder, Treasurer, Chief Financial Officer, and
12 Secretary, had knowledge of or knowingly participated in the conduct for which Respondent Arden
13 Pharmacy was disciplined, then Respondent Farzamdoost shall be prohibited from serving as a
14 manager, administrator, owner, member, officer, director, associate, partner, or any other person
15 with management or control of a licensee for five years if Pharmacy Permit Number PHY 53636
16 is placed on probation or until Pharmacy Permit Number PHY 53636 is reinstated if it is revoked.

17 29. Pursuant to section 4307 of the Code, if discipline is imposed on Pharmacist License
18 Number RPH 48839 issued to Kambiz Farzamdoost shall be prohibited from serving as a manager,
19 administrator, owner, member, officer, director, associate, partner, or any other person with
20 management or control of a licensee for five years if Pharmacist License Number RPH 48839 is
21 placed on probation or until Pharmacist License Number RPH 48839 is reinstated if it is revoked.

22 **PRAYER**

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

25 1. Revoking or suspending Pharmacy Permit Number PHY 53636, issued to Arden
26 Drugs Inc. dba Arden Medical Pharmacy, Kambiz Farzamdoost;

27 2. Revoking or suspending Pharmacist License Number RPH 48839, issued to Kambiz
28 Farzamdoost;

1 3. Prohibiting Arden Drugs Inc. dba Arden Medical Pharmacy, Kambiz Farzamdoost
2 from serving as a manager, administrator, owner, member, officer, director, associate, partner, or
3 any other person with management or control of a licensee for five years if Pharmacy Permit
4 Number PHY 53636 is placed on probation or until Pharmacy Permit Number PHY 53636 is
5 reinstated if Pharmacy Permit Number PHY 53636 issued to Arden Drugs Inc. dba Arden
6 Medical Pharmacy, Kambiz Farzamdoost is revoked.

7 4. Prohibiting Kambiz Farzamdoost from serving as a manager, administrator, owner,
8 member, officer, director, associate, partner, or any other person with management or control of a
9 licensee for five years if Pharmacy Permit Number PHY 53636 is placed on probation or until
10 Pharmacy Permit Number PHY 53636 is reinstated if Pharmacy Permit Number PHY 53636
11 issued to Arden Drugs Inc. dba Arden Medical Pharmacy, Kambiz Farzamdoost is revoked.

12 5. Prohibiting Kambiz Farzamdoost from serving as a manager, administrator, owner,
13 member, officer, director, associate, partner, or any other person with management or control of a
14 licensee for five years if Pharmacist License Number RPH 48839 is placed on probation or until
15 Pharmacist License Number RPH 48839 is reinstated if Pharmacist License Number RPH 48839
16 issued to Kambiz Farzamdoost is revoked.

17 6. Ordering Arden Drugs Inc. dba Arden Medical Pharmacy and Kambiz Farzamdoost
18 to pay the California State Board of Pharmacy the reasonable costs of the investigation and
19 enforcement of this case, pursuant to Business and Professions Code section 125.3; and,

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

21
22 DATED: 6/30/2022

Signature on File

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

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