

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

In the Matter of the Accusation Against:

**TOWIN PHARMACY, INC., dba,
PINE CONE DRUG,
THANH VIET NGUYEN, PRES/VP/TREAS/PIC,
TRACY CHIHARU-SHIN NGUYEN, SECRETARY,**

Pharmacy Permit No. PHY 53707;

and

**THANH VIET NGUYEN,
Pharmacist License No. RPH 52589,**

Respondents.

Agency Case No. 7296

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 March 1, 2023.

It is so ORDERED on January 30, 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

1 ROB BONTA
Attorney General of California
2 DAVID E. BRICE
Supervising Deputy Attorney General
3 PATRICIA WEBBER HEIM
Deputy Attorney General
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Attorneys for Complainant
8

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

12 In the Matter of the Accusation Against:

Case No. 7296

13 **TOWIN PHARMACY, INC.**
14 **dba PINE CONE DRUG**
15 **THANH VIET NGUYEN,**
16 **PRES/VP/TREAS/PIC**
17 **TRACY CHIHARU-SHIN NGUYEN,**
SECRETARY
19660 Highway 88
Pine Grove, CA 95665

**STIPULATED SURRENDER OF
LICENSES AND ORDER**

18 **Pharmacy Permit No. PHY 53707**

19 and

20 **THANH VIET NGUYEN**
21 2164 Belvedere Circle
Roseville, CA 95678

22 **Registered Pharmacist License No. RPH**
23 **52589**

24 Respondents.

25
26 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
27 entitled proceedings that the following matters are true:
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1 **PARTIES**

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

6 2. Thanh Viet Nguyen (Respondent Nguyen) and Towin Pharmacy, Inc. doing business
7 as Pine Cone Drug (Respondent PCD) with Thanh Viet Nguyen identified as seventy-five (75)
8 percent shareholder, and President, Vice President, Treasurer, and Pharmacist-in-Charge and
9 Tracy Chiharu-Shin Nguyen identified as twenty-five (25) percent shareholder and Secretary are
10 represented in this proceeding by attorney Natallia Mazina, whose address is: 100 Pine Street,
11 Suite 1250, San Francisco, CA 94111.

12 **Pharmacy Permit**

13 3. On or about October 19, 2015, the Board issued Pharmacy Permit Number
14 PHY 53707 to Respondent PCD. The Pharmacy Permit was cancelled on November 4, 2019, and
15 has not been renewed.

16 **Pharmacist License**

17 4. On or about August 30, 2001, the Board issued Pharmacist License No. RPH 52589
18 to Respondent Nguyen. The Pharmacist License was in full force and effect at all times relevant
19 to the charges brought in First Amended Accusation No. 7296 and will expire on January 31,
20 2023, unless renewed.

21 **JURISDICTION**

22 5. First Amended Accusation No. 7296 was filed before the Board, and is currently
23 pending against Respondents. The First Amended Accusation and all other statutorily required
24 documents were properly served on Respondents on November 10, 2022. Respondents timely
25 filed a Notice of Defense contesting the First Amended Accusation. A copy of First Amended
26 Accusation No. 7296 is attached as Exhibit A and incorporated by reference.

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1 **ADVISEMENT AND WAIVERS**

2 6. Respondents have carefully read, fully discussed with counsel, and understand the
3 charges and allegations in First Amended Accusation No. 7296. Respondents also have carefully
4 read, fully discussed with counsel, and understand the effects of this Stipulated Surrender of
5 Licenses and Order.

6 7. Respondents are fully aware of their legal rights in this matter, including the right to a
7 hearing on the charges and allegations in the First Amended Accusation; the right to confront and
8 cross-examine the witnesses against them; the right to present evidence and to testify on their own
9 behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the
10 production of documents; the right to reconsideration and court review of an adverse decision;
11 and all other rights accorded by the California Administrative Procedure Act and other applicable
12 laws.

13 8. Respondents voluntarily, knowingly, and intelligently waives and gives up each and
14 every right set forth above.

15 **CULPABILITY**

16 9. Respondents understand that the charges and allegations in First Amended
17 Accusation No. 7296, if proven at a hearing, constitute cause for imposing discipline upon
18 Respondent Nguyen's Pharmacist License and Respondent PCD's Pharmacy Permit.

19 10. For the purpose of resolving the First Amended Accusation without the expense and
20 uncertainty of further proceedings, Respondents agree that, at a hearing, Complainant could
21 establish a factual basis for the charges in the First Amended Accusation and that those charges
22 constitute cause for discipline. Respondents hereby give up their right to contest that cause for
23 discipline exists based on those charges.

24 11. Respondents understand that by signing this stipulation they enable the Board to issue
25 an order accepting the surrender of Respondent Nguyen's Pharmacist License and Respondent
26 PCD's Pharmacy Permit without further process.

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CONTINGENCY

1
2 12. This stipulation shall be subject to approval by the Board. Respondents understand
3 and agree that counsel for Complainant and the staff of the Board may communicate directly with
4 the Board regarding this stipulation and surrender, without notice to or participation by
5 Respondents or their counsel. By signing the stipulation, Respondents understand and agree that
6 they may not withdraw their agreement or seek to rescind the stipulation prior to the time the
7 Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and
8 Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for
9 this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall
10 not be disqualified from further action by having considered this matter.

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

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

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

ORDER

22
23 IT IS HEREBY ORDERED that Pharmacy Permit No. PHY 53707, issued to Towin
24 Pharmacy, Inc. doing business as Pine Cone Drug with Thanh Viet Nguyen identified as seventy-
25 five (75) percent shareholder and President, Vice President, Treasurer, and Pharmacist-in-Charge
26 and Tracy Chiharu-Shin Nguyen identified as twenty-five (25) percent shareholder and Secretary
27 and Pharmacist License No. RPH 52589, issued to Respondent Thanh Viet Nguyen, are
28 surrendered and accepted by the Board.

1 License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the
2 Decision and Order of the Board of Pharmacy.

3 DATED: _____
4 THANH VIET NGUYEN
5 *Respondent*

6 I have carefully read the above Stipulated Surrender of Licenses and Order and have fully
7 discussed it with my attorney Natallia Mazina. I understand the stipulation and the effect it will
8 have on my Pharmacy Permit. I enter into this Stipulated Surrender of License and Order
9 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
10 Board of Pharmacy.

11 DATED: _____
12 TRACY CHIHARU-SHIN NGUYEN
13 *Respondent*

14 I have read and fully discussed with Respondent Thanh Viet Nguyen and Tracy Chiharu-
15 Shin Nguyen the terms and conditions and other matters contained in this Stipulated Surrender of
16 License and Order. I approve its form and content.

17 DATED: _____
18 NATALLIA MAZINA
19 *Attorney for Respondent*

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1 License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the
2 Decision and Order of the Board of Pharmacy.

3 DATED: 12/7/22 
4 THANH VIET NGUYEN
5 *Respondent*

6 I have carefully read the above Stipulated Surrender of Licenses and Order and have fully
7 discussed it with my attorney Natallia Mazina. I understand the stipulation and the effect it will
8 have on my Pharmacy Permit. I enter into this Stipulated Surrender of License and Order
9 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
10 Board of Pharmacy.

11 DATED: 12/14/22 
12 TRACY CHIHARU-SHIN NGUYEN
13 *Respondent*

14 I have read and fully discussed with Respondent Thanh Viet Nguyen and Tracy Chiharu-
15 Shin Nguyen the terms and conditions and other matters contained in this Stipulated Surrender of
16 License and Order. I approve its form and content.

17 DATED: December 14, 2022 
18 NATALLIA MAZINA
19 *Attorney for Respondent*

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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: _____

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

PATRICIA WEBBER HEIM
Deputy Attorney General
Attorneys for Complainant

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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: December 14, 2022

Respectfully submitted,

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



PATRICIA WEBBER HEIM
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

First Amended Accusation No. 7296

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Attorney General of California
2 DAVID E. BRICE
Supervising Deputy Attorney General
3 PATRICIA WEBBER HEIM
Deputy Attorney General
4 State Bar No. 230889
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Sacramento, CA 94244-2550
6 Telephone: (916) 210-7519
Facsimile: (916) 327-8643
7 *Attorneys for Complainant*

8
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15 **THANH VIET NGUYEN, PRES/VP/TREAS/PIC**
16 **TRACY CHIHARU-SHIN NGUYEN,**
SECRETARY
19660 Highway 88
Pine Grove, CA 95665

FIRST AMENDED ACCUSATION

17 **Pharmacy Permit No. PHY 53707**

18 and

19 **THANH VIET NGUYEN**
20 2164 Belvedere Circle
Roseville, CA 95678

21 **Registered Pharmacist License No. RPH 52589**

22 Respondents.

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 (Board), Department of Consumer Affairs.

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1 8. Code section 4113, subdivision (c) states:

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

4 9. Code section 4301 states, in pertinent part:

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

8 ...

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

12 ...

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

15 ...

16 (l) The conviction of a crime substantially related to the qualifications,
17 functions, and duties of a licensee under this chapter. The record of conviction of a
18 violation of Chapter 13 (commencing with Section 801) of Title 21 of the United
19 States Code regulating controlled substances or of a violation of the statutes of this
20 state regulating controlled substances or dangerous drugs shall be conclusive
21 evidence of unprofessional conduct. In all other cases, the record of conviction shall
22 be conclusive evidence only of the fact that the conviction occurred. The board may
23 inquire into the circumstances surrounding the commission of the crime, in order to
24 fix the degree of discipline or, in the case of a conviction not involving controlled
25 substances or dangerous drugs, to determine if the conviction is of an offense
26 substantially related to the qualifications, functions, and duties of a licensee under this
27 chapter. A plea or verdict of guilty or a conviction following a plea of nolo
28 contendere is deemed to be a conviction within the meaning of this provision. The
board may take action when the time for appeal has elapsed, or the judgment of
conviction has been affirmed on appeal or when an order granting probation is made
suspending the imposition of sentence, irrespective of a subsequent order under
Section 1203.4 of the Penal Code allowing the person to withdraw his or her plea of
guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or
dismissing the accusation, information, or indictment.

...

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

...

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1 10. Code section 4302 states:

2 The board may deny, suspend, or revoke any license where conditions exist in
3 relation to any person holding 10 percent or more of the ownership interest or where
4 conditions exist in relation to any officer, director, or other person with management
or control of the license that would constitute grounds for disciplinary action against a
licensee.

5 11. Code section 4307, subdivision (a), states:

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

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

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

23 12. Code section 4311, subdivision (a), states:

24 (a) Any license issued by the board, or the holder thereof, shall be suspended
25 automatically during any time that the person is incarcerated after conviction of a
26 felony, regardless of whether the conviction has been appealed. The board,
27 immediately upon receipt of a certified copy of a record of a criminal conviction,
28 shall determine whether the person has been automatically suspended by virtue of
incarceration pursuant to a felony conviction and, if so, the duration of that
suspension. The board shall notify the person so suspended of the suspension and that
the person has a right to request a hearing, solely as to whether he or she is
incarcerated pursuant to a felony conviction, in writing at that person's address of
record with the board and at the facility in which the person is incarcerated.

COST RECOVERY

13. Code section 125.3 provides, in pertinent part, that the Board may request the
administrative law judge to direct a licensee found to have committed a violation or violations of
the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
enforcement of the case, with failure of the licensee to comply subjecting the license to not being

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1 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
2 included in a stipulated settlement.

3 **CONTROLLED SUBSTANCE INFORMATION**

4 14. Marijuana is a Schedule I controlled substance as designated by the United States
5 Code of Federal Regulations, section 1308.11, subdivision (d)(31).

6 **FACTUAL ALLEGATIONS**

7 15. On or about October 15, 2019, a warrant to search and seize was granted by a United
8 States Magistrate Judge for a Drug Enforcement Administration (DEA) task force officer to
9 search Respondent Nguyen's vehicles, home and person for contraband located in California.
10 The basis of the search and seize warrant was pursuant to a probable cause affidavit signed by a
11 DEA officer that implicated Respondent Nguyen's involvement in ongoing drug trafficking case
12 that originated in Georgia. Specifically, the DEA officer had conducted a search and seize
13 warrant at a restaurant in Savannah, Georgia, and found large quantities of marijuana, vape pens,
14 marijuana cartridges, several thousand dollars in cash, a ledger, cell phones, a hand gun, and mail
15 parcels that indicated they had originated from California. Among one of the seized items was a
16 notebook that contained a list of dates, weights, dollar amounts, names of marijuana strains,
17 documented deposits, and different payment amounts (bank transfers) to a bank account for an
18 individual named "Thanh," later identified as Respondent Nguyen.

19 16. The DEA's search of Respondent Nguyen's vehicles, home and person revealed that
20 beginning as early as November 2017, Respondent Nguyen conspired to obtain marijuana, vape
21 pens and marijuana cartridges with the intent to distribute. Specifically, the DEA officer located
22 text messages between Respondent Nguyen and his sister discussing that Respondent Nguyen
23 would mail large amounts of marijuana from California to Georgia for his sister to sell. The text
24 messages also revealed that Respondent Nguyen and his sister discussed using money from their
25 parents' personal checking accounts and their family's business account to acquire the marijuana
26 before replacing the money bank into the accounts. They agreed to split the profits equally.
27 Respondent Nguyen informed his sister that he would send the packages that contained the
28 marijuana in packages with false names and addresses in an attempt to avoid detection.

1 Respondent Nguyen and his sister agreed to shuffle the money they received from the sale of the
2 marijuana, vape pens and marijuana cartridges between their parents' restaurant and Respondent
3 Nguyen's pharmacy, Respondent PCD.

4 **FIRST CAUSE FOR DISCIPLINE**

5 **(Criminal Conviction)**

6 17. Respondent PCD and Respondent Nguyen are subject to disciplinary action under
7 Code sections 490, 4301, subdivision (l) and 4302, in that Respondent Nguyen was convicted of a
8 crime substantially related to the qualifications, functions, and duties of a licensee, as follows:
9 On or about December 6, 2021, in a criminal proceeding entitled, *United States of America v.*
10 *Thanh Nguyen* (USDC, Eastern Dist., Case No. 4:19CR00171-3) the Court convicted Respondent
11 Nguyen on his plea of guilty of violating United States Code, title 21, section 846 (conspiracy to
12 possess with intent to distribute, and to distribute, 50 kilograms or more of marijuana) and United
13 States Code, title 18, section 1956, subdivision (h) (money laundering conspiracy). Respondent
14 Nguyen was sentenced to serve forty-two (42) months in the Federal Bureau of Prisons for each
15 of the violations to be served concurrently. Upon release from imprisonment, Respondent will be
16 placed on supervised release for three (3) years with mandatory conditions. The circumstances of
17 the crime are as more particularly set forth above in paragraphs 15 and 16, and incorporated
18 herein by reference.

19 **SECOND CAUSE FOR DISCIPLINE**

20 **(Moral Turpitude)**

21 18. Respondent PCD and Respondent Nguyen are subject to disciplinary action under
22 Code sections 4301, subdivision (f), and 4302, in that Respondent Nguyen, a seventy-five (75)
23 percent shareholder, officer and pharmacist-in-charge of Respondent PCD committed acts that
24 constitute moral turpitude. Respondent Nguyen conspired to obtain large amounts of marijuana,
25 vape pens and marijuana cartridges and mailed them to his sister in Georgia with the intent to
26 distribute and sell. Respondent Nguyen and his sister agreed to split the profit and agreed to
27 shuffle the money through their personal accounts, their parents' family business account and
28

1 Respondent Nguyen's pharmacy, Respondent PCD, as more particularly set forth above in
2 paragraphs 15 through 17, and incorporated here by reference.

3 **THIRD CAUSE FOR DISCIPLINE**

4 **(Violation of Federal Laws Regulating Controlled Substances)**

5 19. Respondent PCD and Respondent Nguyen are subject to disciplinary action under
6 Code sections 4301, subdivision (j), and 4302, in that Respondent Nguyen, a seventy-five (75)
7 percent shareholder, officer and pharmacist-in-charge of Respondent PCD violated federal laws
8 regulating controlled substances. Specifically, Respondent Nguyen violated United States Code,
9 title 21, section 846 and United States Code, title 18, section 1956, when Respondent Nguyen and
10 his sister conspired to possess with the intent to distribute and distribute the controlled substance
11 marijuana, and conspired to launder money, as more particularly set forth above in paragraph 17,
12 and incorporated here by reference.

13 **FOURTH CAUSE FOR DISCIPLINE**

14 **(Conspiring to Violate Laws Governing the Practice of Pharmacy)**

15 20. Respondent PCD and Respondent Nguyen are subject to disciplinary action under
16 Code sections 4301, subdivision (o), and 4302, in that Respondent Nguyen, a seventy-five (75)
17 percent shareholder, officer and pharmacist-in-charge of Respondent PCD conspired to violate
18 laws governing the practice of pharmacy, as more particularly set forth above in paragraphs 17
19 through 19, and incorporated here by reference.

20 **OTHER MATTERS**

21 21. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit Number
22 PHY 53707 issued to Towin Pharmacy, Inc. doing business as Pine Cone Drug, Thanh Viet
23 Nguyen shall be prohibited from serving as a manager, administrator, owner, member, officer,
24 director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 53707
25 is placed on probation or until Pharmacy Permit Number PHY 53707 is reinstated if it is revoked.

26 22. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit Number
27 PHY 53707 issued to Towin Pharmacy, Inc. doing business as Pine Cone Drug, while Tracy
28 Chiharu-Shin Nguyen has been a member and had knowledge of or knowingly participated in any

1 conduct for which the licensee was disciplined, Tracy Chiharu-Shin Nguyen shall be prohibited
2 from serving as a manager, administrator, owner, member, officer, director, associate, or partner
3 of a licensee for five years if Pharmacy Permit Number PHY 53707 is placed on probation or
4 until Pharmacy Permit Number PHY 53707 is reinstated if it is revoked.

5 23. Pursuant to Code section 4307, if discipline is imposed on Registered Pharmacist
6 License Number RPH 52589, issued to Thanh Viet Nguyen, Thanh Viet Nguyen shall be
7 prohibited from serving as a manager, administrator, owner, member, officer, director, associate,
8 or partner of a licensee for five years if Registered Pharmacist License Number RPH 52589 is
9 placed on probation or until Registered Pharmacist License Number RPH 52589 is reinstated if it
10 is revoked.

11 **PRAYER**

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

14 1. Revoking or suspending Pharmacy Permit Number PHY 53707, issued to Towin
15 Pharmacy, Inc. doing business as Pine Cone Drug;

16 2. Revoking or suspending Registered Pharmacist License Number RPH 52589, issued
17 to Thanh Viet Nguyen;

18 3. Ordering Respondent PCD and Respondent Nguyen to pay the Board the reasonable
19 costs of the investigation and enforcement of this case, pursuant Code section 125.3;

20 4. Ordering that Respondent Thanh Viet Nguyen is prohibited from serving as a
21 manager, administrator, owner, member, officer, director, associate, or partner of a licensee
22 pursuant to Code section 4307;

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1 5. Ordering that Tracy Chiharu-Shin Nguyen is prohibited from serving as a manager,
2 administrator, owner, member, officer, director, associate, or partner of a licensee pursuant to
3 Code section 4307; and

4 6. Taking such other and further action as deemed necessary and proper.

5
6 DATED: 11/3/2022

Sodergren, Digitally signed by
Sodergren, Anne@DCA
Anne@DCA Date: 2022.11.03
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ANNE SODERGRÉN
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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