

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

In the Matter of the Accusation Against:

ZACHARY JOSEPH LEWIS, Respondent

Pharmacy Technician Registration No. TCH 170330

Agency Case No. 7512

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 May 8, 2024.

It is so ORDERED on April 8, 2024.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By

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

Seung W. Oh, Pharm.D.
Board President

1 ROB BONTA
Attorney General of California
2 GREGORY J. SALUTE
Supervising Deputy Attorney General
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8 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:

Case No. 7512

14 **ZACHARY JOSEPH LEWIS**
15 **9950 Juanita Street, Apt. 157**
Cypress, CA 90630

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

16 **Pharmacy Technician Registration No. TCH**
17 **170330**

18 Respondent.

19
20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
21 entitled proceedings that the following matters are true:

22 **PARTIES**

23 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy
24 (Board). She brought this action solely in her official capacity and is represented in this matter by
25 Rob Bonta, Attorney General of the State of California, by Nicole R. Trama, Deputy Attorney
26 General.

27 2. Zachary Joseph Lewis is representing himself in this proceeding and has chosen not
28 to exercise his right to be represented by counsel.

3. On or about February 12, 2019, the Board issued Pharmacy Technician Registration No. TCH 170330 to Zachary Joseph Lewis (Respondent). The Pharmacy Technician Registration was in full force and effect at all times relevant to the charges brought in Accusation No. 7512 and will expire on November 30, 2024, unless renewed.

JURISDICTION

4. Accusation No. 7512 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on December 22, 2023. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 7512 is attached as Exhibit A and incorporated by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 7512. Respondent also has carefully read, and understands the effects of this Stipulated Surrender of License and Order.

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

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

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 7512, agrees that cause exists for discipline and hereby surrenders his Pharmacy Technician Registration No. TCH 170330 for the Board's formal acceptance.

1 9. Respondent understands that by signing this stipulation he enables the Board to issue
2 an order accepting the surrender of his Pharmacy Technician Registration without further process.

3 **RESERVATION**

4 10. The admissions made by Respondent herein are only for the purposes of this
5 proceeding, or any other proceedings in which the Board of Pharmacy or other professional
6 licensing agency is involved, and shall not be admissible in any other criminal or civil
7 proceeding.

8 **CONTINGENCY**

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

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

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

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

ORDER

IT IS HEREBY ORDERED that Pharmacy Technician Registration No. TCH 170330, issued to Respondent Zachary Joseph Lewis, is surrendered and accepted by the Board.

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

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

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

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a new application for licensure. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked or surrendered license in effect at the time the application or petition is filed, and all of the charges and allegations contained in Accusation No. 7512 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. Respondent shall pay the agency its costs of investigation and enforcement in the amount of \$4,116.25 prior to issuance of a new or reinstated license.

6. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation, No. 7512 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.


7. Respondent shall not apply for or petitioning for reinstatement of any license before the Board for three (3) years from the effective date of this decision and order.

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Pharmacy Technician Registration. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: _____

03/11/24


ZACHARY JOSEPH LEWIS
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: _____

Respectfully submitted,

ROB BONTA
Attorney General of California
GREGORY J. SALUTE
Supervising Deputy Attorney General

NICOLE B. TRAMA
Deputy Attorney General
Attorneys for Complainant

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ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Pharmacy Technician Registration. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: _____
ZACHARY JOSEPH LEWIS
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: 3/12/2024 _____
Respectfully submitted,
ROB BONTA
Attorney General of California
GREGORY J. SALUTE
Supervising Deputy Attorney General

Nicole R. Trama
NICOLE R. TRAMA
Deputy Attorney General
Attorneys for Complainant

SD2023800992

Exhibit A

Accusation No. 7512

1 ROB BONTA
Attorney General of California
2 GREGORY J. SALUTE
Supervising Deputy Attorney General
3 NICOLE R. TRAMA
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4 State Bar No. 263607
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Attorneys for Complainant

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

13 In the Matter of the Accusation Against:

Case No. 7512

14 **ZACHARY JOSEPH LEWIS**
15 **8162 Somerdale Ln.**
La Palma, CA 90623

ACCUSATION

16 **Pharmacy Technician Registration No. TCH**
17 **170330**

Respondent.

19
20 **PARTIES**

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

23 2. On or about February 12, 2019, the Board of Pharmacy issued Pharmacy Technician
24 Registration Number TCH 170330 to Zachary Joseph Lewis (Respondent). The Pharmacy
25 Technician Registration was in full force and effect at all times relevant to the charges brought
26 herein and will expire on November 30, 2024, unless renewed.

27 ///

28 ///

JURISDICTION

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

4. Section 4011 of the Code provides that the Board shall administer and enforce both the Pharmacy Law (Bus. & Prof. Code, § 4000 *et seq.*) and the Uniform Controlled Substances Act (Health & Safety Code, § 11000 *et seq.*).

5. Code section 4300, subdivision (a) provides that every license issued by the Board may be suspended or revoked.

6. Code section 4300.1 states:

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

STATUTORY PROVISIONS

7. Code section 492 states:

Notwithstanding any other provision of law, successful completion of any diversion program under the Penal Code, or successful completion of an alcohol and drug problem assessment program under Article 5 (commencing with Section 23249.50) of Chapter 12 of Division 11 of the Vehicle Code, shall not prohibit any agency established under Division 2 (commencing with Section 500) of this code, or any initiative act referred to in that division, from taking disciplinary action against a licensee or from denying a license for professional misconduct, notwithstanding that evidence of that misconduct may be recorded in a record pertaining to an arrest.

This section shall not be construed to apply to any drug diversion program operated by any agency established under Division 2 (commencing with Section 500) of this code, or any initiative act referred to in that division.

8. Code section 4060 states:

A person shall not possess any controlled substance, except that furnished to a person upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7, or furnished pursuant to a drug order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse practitioner pursuant to Section 2836.1, a physician assistant pursuant to Section 3502.1, a naturopathic doctor pursuant to Section 3640.5, or a

1 pharmacist pursuant to Section 4052.1, 4052.2, or 4052.6. This section does not
2 apply to the possession of any controlled substance by a manufacturer, wholesaler,
3 third-party logistics provider, pharmacy, pharmacist, physician, podiatrist, dentist,
4 optometrist, veterinarian, naturopathic doctor, certified nurse-midwife, nurse
5 practitioner, or physician assistant, if in stock in containers correctly labeled with
6 the name and address of the supplier or producer.

7

8 9. Code section 4301 states:

9 The board shall take action against any holder of a license who is guilty of
10 unprofessional conduct or whose license has been issued by mistake.

11 Unprofessional conduct includes, but is not limited to, any of the following:

12 . . .

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

16 . . .

17 (h) The administering to oneself, of any controlled substance, or the use of
18 any dangerous drug or of alcoholic beverages to the extent or in a manner as to be
19 dangerous or injurious to oneself, to a person holding a license under this chapter,
20 or to any other person or to the public, or to the extent that the use impairs the
21 ability of the person to conduct with safety to the public the practice authorized by
22 the license.

23 . . .

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

26

27 10. Section 4307 of the Code states:

28 (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 been denied or revoked, is under suspension or has been placed on probation, and
while acting as the manager, administrator, owner, member, officer, director,
associate, partner, or any other person with management or control had knowledge of
or knowingly participated in any conduct for which the license was denied, revoked,
suspended, or placed on probation, shall be prohibited from serving as a manager,
administrator, owner, member, officer, director, associate, partner, or in any other

position with management or control of a licensee as follows:

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

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

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

11. Health and Safety Code section 11377, subdivision (a) states:

Except as authorized by law and as otherwise provided in subdivision (b) or Section 11375, or in Article 7 (commencing with Section 4211) of Chapter 9 of Division 2 of the Business and Professions Code, every person who possesses any controlled substance which is (1) classified in Schedule III, IV, or V, and which is not a narcotic drug, (2) specified in subdivision (d) of Section 11054, except paragraphs (13), (14), (15), and (20) of subdivision (d), (3) specified in paragraph (11) of subdivision (c) of Section 11056, (4) specified in paragraph (2) or (3) of subdivision (f) of Section 11054, or (5) specified in subdivision (d), (e), or (f) of Section 11055, unless upon the prescription of a physician, dentist, podiatrist, or veterinarian, licensed to practice in this state, shall be punished by imprisonment in a county jail for a period of not more than one year, except that such person may instead be punished pursuant to subdivision (h) of Section 1170 of the Penal Code if that person has one or more prior convictions for an offense specified in clause (iv) of subparagraph (C) of paragraph (2) of subdivision (e) of Section 667 of the Penal Code or for an offense requiring registration pursuant to subdivision (c) of Section 290 of the Penal Code.

REGULATORY PROVISIONS

12. California Code of Regulations, title 16, section 1770, states:

(a) For the purpose of denial, suspension, or revocation of a personal or facility license pursuant to Section 141 or Division 1.5 (commencing with Section 475) of the Business and Professions Code, a crime, professional misconduct, or act shall be considered substantially related to the qualifications, functions or duties of the practice, profession, or occupation that may be performed under the license type sought or held if to a substantial degree it evidences present or potential unfitness of an applicant or licensee to perform the functions authorized by the license in a manner consistent with the public health, safety, or welfare.

(b) In making the substantial relationship determination required under subdivision (a) for a crime, the board will consider the following criteria:

(1) The nature and gravity of the offense;

(2) The number of years elapsed since the date of the offense; and

(3) The nature and duties of the practice, profession, or occupation that may be performed under the license type sought or held.

(c) For purposes of subdivision (a), substantially related crimes, professional misconduct, or acts shall include, but are not limited to, those which:

(1) Violate or attempt to violate, directly or indirectly, or to aid, abet or conspire to violate, any provision of law of this state, or any other jurisdiction, governing the practice of pharmacy.

(2) Violate or attempt to violate, directly or indirectly, or to aid, abet or conspire to violate, any provision of Chapter 13 (commencing with Section 801) of Title 21 of the United States Code regulating controlled substances or any law of this state, or any other jurisdiction, relating to controlled substances or dangerous drugs.

(3) Violate or attempt to violate, directly or indirectly, or to aid, abet or conspire to violate, any provision of law of this state, or any other jurisdiction, relating to government provided or government supported healthcare.

(4) Involve dishonesty, fraud, deceit, or corruption related to money, items, documents, or personal information.

(5) Involve a conviction for driving under the influence of drugs or alcohol.

COST RECOVERY

13. Section 125.3 of the Code 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.

DRUGS

14. Methamphetamine is a Schedule II controlled substance pursuant to Health and Safety Code section 11055, subdivision (d).

FACTUAL ALLEGATIONS

15. Between 2021 and 2022, Respondent has illegally possessed and used methamphetamine and was involved in several domestic violence incidents.

16. On March 20, 2021, an officer with the Huntington Beach Police Department contacted Respondent in a motel room in response to a disturbing the peace call. During that contact, Respondent claimed ownership of a pipe which appeared to have methamphetamine residue in it. Respondent admitted to the officer that he used the pipe to smoke methamphetamine. Upon searching Respondent, the officer located two baggies in Respondent's pocket that appeared to be methamphetamine (approximately 2.0 grams). Respondent confirmed

///

1 the substance was methamphetamine. Respondent was arrested for possession of drug
2 paraphernalia and possession of a controlled substance.

3 17. On September 8, 2022, an officer with the Huntington Beach Police Department
4 responded to a report regarding a domestic violence incident. The victim, who was in a
5 relationship with Respondent, reported to officers that Respondent had become angry with the
6 victim for not going to sleep. The victim reported that the Respondent pinned the victim to the
7 bed, held a glass bottle over the victim's head and stated that the victim needed to go to sleep or
8 Respondent would "make" the victim go to sleep. The victim kicked Respondent in the chest and
9 then Respondent punched the victim in the face and arms multiple times, resulting in visible
10 injuries. Respondent was arrested for domestic violence. The victim was granted an emergency
11 protective order.

12 18. On October 23, 2022, an officer with the Huntington Beach Police Department
13 responded to a neighbor's report regarding a family disturbance at Respondent's home where he
14 heard the victim yelling for help and for someone to call the police. Upon contact, the victim told
15 the officer that Respondent had become angry with the victim and punched the victim five to ten
16 times. When the victim went to another room, Respondent followed the victim, pulled the victim
17 to the ground, straddled and punched the victim one to five times. Respondent told the officer
18 that only a verbal argument had occurred. However, one of Respondent's roommates who
19 witnessed the incident, told the officer that Respondent repeatedly punched the victim.
20 Respondent was arrested and booked for domestic battery. Later that day, the police were called
21 out to the home again in response to a physical altercation between Respondent and the victim.
22 The victim reported that Respondent was angry with the victim about the emergency protective
23 order that had been issued and that Respondent became aggressive with the victim and punched
24 the victim 5-10 times and threatened to kill the victim if the victim did not listen and do exactly
25 what Respondent said. Respondent told officers that after being released from jail, he returned
26 home to get his belongings and to apologize to the victim. Respondent admitted that he had
27 knowledge of the emergency protective order that had been issued. He stated that while
28 discussing it with the victim, he became angry and pushed the victim on the bed, straddled and

1 punched the victim 20-30 times. Respondent was arrested for domestic violence and violating a
2 domestic violence court order.

3 19. On November 23, 2022, officers from the Huntington Police Department were
4 dispatched in response to a disturbing the peace call involving Respondent and the victim. Upon
5 contact, the officer discovered that Respondent had two active bench warrants for his arrest.
6 While searching Respondent, the officer located a baggie containing approximately 2.10 grams of
7 methamphetamine in Respondent's pocket. Respondent admitted that he and the victim are
8 "addicts" who use methamphetamine daily, as they cannot stay awake without it. In addition to
9 being booked on the previously issued warrants, Respondent was arrested for possession of a
10 controlled substance.

11 **FIRST CAUSE FOR DISCIPLINE**

12 **(Unlawful Possession of a Controlled Substance)**

13 20. Respondent is subject to disciplinary action under Code section 4301, subdivision (j),
14 for violation of statutes regulating controlled substances, in that Respondent was found in
15 possession of a controlled substance, methamphetamine, in violation of Health and Safety Code
16 section 11377 and Business and Professions Code section 4060, as set forth in paragraphs 15
17 through 19, incorporated herein.

18 **SECOND CAUSE FOR DISCIPLINE**

19 **(Unlawful Use of a Controlled Substance)**

20 21. Respondent is subject to disciplinary action under Code section 4301, subdivision (h),
21 for using controlled substances to the extent or in a manner as to be dangerous or injurious to
22 himself, as set forth in paragraphs 15 through 19, incorporated herein.

23 **THIRD CAUSE FOR DISCIPLINE**

24 **(Dishonesty or Moral Turpitude)**

25 22. Respondent is subject to disciplinary action under Code section 4301, subdivision (f)
26 for commission of acts involving moral turpitude or dishonesty as set forth in paragraphs 15
27 through 19, incorporated herein.

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1 **FOURTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct)**

3 23. Respondent is subject to disciplinary action under Code section 4301, in that
4 Respondent acts constituted unprofessional conduct as set forth in paragraphs 15 through 19,
5 incorporated herein.

6 **OTHER MATTERS**

7 24. Pursuant to Code section 4307, if discipline is imposed in the Accusation against
8 Pharmacy Technician Registration Number TCH 170330 issued to Zachary Joseph Lewis, then
9 Zachary Joseph Lewis shall be prohibited from serving as a manager, administrator, owner,
10 member, officer, director, associate, or partner of a licensee for five years if Pharmacy Technician
11 Registration Number TCH 170330 is placed on probation or until Pharmacy Technician
12 Registration Number TCH 170330 is reinstated if it is revoked.

13 **PRAYER**

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

16 1. Revoking or suspending Pharmacy Technician Registration Number TCH 170330,
17 issued to Zachary Joseph Lewis;

18 2. Prohibiting Zachary Joseph Lewis from serving as a manager, administrator, owner,
19 member, officer, director, associate, or partner of a licensee for five years if Pharmacy Technician
20 Registration Number TCH 170330 is placed on probation or until Pharmacy Technician
21 Registration Number TCH 170330 is reinstated if Pharmacy Technician Registration Number
22 TCH 170330 issued to Zachary Joseph Lewis is revoked; and

23 3. Ordering Zachary Joseph Lewis to pay the Board of Pharmacy the reasonable costs of
24 the investigation and enforcement of this case, pursuant to Business and Professions Code section
25 125.3; and,

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

DATED: 12/12/2023

Sodergren,
Anne@DCA

Digitally signed by
Sodergren, Anne@DCA
Date: 2023.12.12 14:53:32
-08'00'

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