

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

In the Matter of the Accusation Against:

**LONGS DRUG STORES CALIFORNIA, LLC, dba
CVS/PHARMACY #3058,
Pharmacy Permit No. PHY 49554,**

and

**MARIO RAOUF ISKANDER,
Pharmacist License No. RPH 84643,**

and

**MAYAR SADEGHI,
Pharmacist License No. RPH 85076,**

Respondents.

Agency Case No. 7548

OAH No. 2023110073

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 August 7, 2024.

It is so ORDERED on July 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 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 GREGORY J. SALUTE
Supervising Deputy Attorney General
3 NICOLE R. TRAMA
Deputy Attorney General
4 State Bar No. 263607
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9441
7 Facsimile: (619) 645-2061
Attorneys for Complainant

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

13 In the Matter of the Accusation Against:

14 **LONGS DRUG STORES CALIFORNIA,**
15 **LLC, DBA CVS/PHARMACY #3058**
16 **26180 Iris Ave.**
Moreno Valley, CA 92555

17 **Pharmacy Permit No. PHY 49554,**

18 **and**

19 **MARIO RAOUF ISKANDER**
20 **8181 Artesia Blvd.**
Buena Park, CA 90621

21 **Pharmacist License No. RPH 84643**

22 **and**

23 **MAYAR SADEGHI**
24 **25102 Camino Del Mar #I**
Laguna Niguel, CA 92677

25 **Pharmacist License No. RPH 85076**

26 Respondents.

Case No. 7548

OAH No. 2023110073

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER AS TO
RESPONDENT SADEGHI ONLY**

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

3 **PARTIES**

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

8 2. Respondent Mayar Sadeghi (Respondent) is represented in this proceeding by
9 attorney Robert Weinberg, Esq., at 19200 Von Karman Ave., Suite 380, Irvine, CA 92612

10 3. On or about September 3, 2021, the Board of Pharmacy issued Pharmacist License
11 Number RPH 85076 to Respondent. The Pharmacy Permit was in full force and effect at all
12 times relevant to the charges brought in First Amended Accusation No. 7548, and will expire on
13 February 28, 2025, unless renewed.

14 **JURISDICTION**

15 4. First Amended Accusation No. 7548 was filed before the Board, and is currently
16 pending against Respondent. The First Amended Accusation and all other statutorily required
17 documents were properly served on Respondent on February 6, 2024. Respondent timely filed
18 his Notice of Defense contesting the First Amended Accusation.

19 5. A copy of First Amended Accusation No. 7548 is attached as Exhibit A and
20 incorporated herein by reference.

21 **ADVISEMENT AND WAIVERS**

22 6. Respondent has carefully read, fully discussed with counsel, and understands the
23 charges and allegations in First Amended Accusation No. 7548. Respondent has also carefully
24 read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and
25 Disciplinary Order.

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

1 to the issuance of subpoenas to compel the attendance of witnesses and the production of
2 documents; the right to reconsideration and court review of an adverse Decision; and all other
3 rights accorded by the California Administrative Procedure Act and other applicable laws.

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

6 **CULPABILITY**

7 9. Respondent understands that the charges and allegations in First Amended
8 Accusation No. 7548, if proven at a hearing, constitute cause for imposing discipline upon his
9 Pharmacist License.

10 10. For the purpose of resolving the First Amended Accusation without the expense and
11 uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could
12 establish a factual basis for the charges in the First Amended Accusation and that those charges
13 constitute cause for discipline. Respondent hereby gives up the right to contest that cause for
14 discipline exists based on those charges.

15 11. Respondent agrees that his Pharmacist License is subject to discipline and agrees to
16 be bound by the Disciplinary Order below.

17 **CONTINGENCY**

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

27
28

1 Respondent's license or which is related to the practice of pharmacy or the
2 manufacturing, obtaining, handling, distributing, billing, or charging for any drug,
3 device or controlled substance.

4 Failure to timely report such occurrence shall be considered a violation of probation.

5 **2. Report to the Board**

6 Respondent shall report to the Board quarterly, on a schedule as directed by the Board or its
7 designee. The report shall be made either in person or in writing, as directed. Among other
8 requirements, Respondent shall state in each report under penalty of perjury whether there has
9 been compliance with all the terms and conditions of probation.

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

15 **3. Interview with the Board**

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

21 **4. Cooperate with Board Staff**

22 Respondent shall timely cooperate with the Board's inspection program and with the
23 Board's monitoring and investigation of Respondent's compliance with the terms and conditions
24 of his probation, including but not limited to: timely responses to requests for information by
25 Board staff; timely compliance with directives from Board staff regarding requirements of any
26 term or condition of probation; and timely completion of documentation pertaining to a term or
27 condition of probation. Failure to timely cooperate shall be considered a violation of probation.
28

1 **5. Continuing Education**

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

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

5 During the period of probation, Respondent shall notify all present and prospective
6 employers of the Decision in Case number 7548 and the terms, conditions and restrictions
7 imposed on Respondent by the Decision, as follows:

8 Within thirty (30) days of the effective date of this Decision, and within ten (10) days of
9 undertaking any new employment, Respondent shall report to the Board in writing the name,
10 physical address, and mailing address of each of his employer(s), and the name(s) and telephone
11 number(s) of all of his direct supervisor(s), as well as any pharmacist(s)-in-charge, designated
12 representative(s)-in-charge, responsible manager, or other compliance supervisor(s) and the work
13 schedule, if known. Respondent shall also include the reason(s) for leaving the prior
14 employment. Respondent shall sign and return to the Board a written consent authorizing the
15 Board or its designee to communicate with all of Respondent's employer(s) and supervisor(s),
16 and authorizing those employer(s) or supervisor(s) to communicate with the Board or its
17 designee, concerning Respondent's work status, performance, and monitoring. Failure to comply
18 with the requirements or deadlines of this condition shall be considered a violation of probation.

19 Within thirty (30) days of the effective date of this Decision, and within fifteen (15) days of
20 Respondent undertaking any new employment, Respondent shall cause (a) His direct supervisor,
21 (b) His pharmacist-in-charge, designated representative-in-charge, responsible manager, or other
22 compliance supervisor, and (c) the owner or owner representative of his employer, to report to the
23 Board in writing acknowledging that the listed individual(s) has/have read the Decision in Case
24 number 7548, and terms and conditions imposed thereby. If one person serves in more than one
25 role described in (a), (b), or (c), the acknowledgment shall so state. It shall be the Respondent's
26 responsibility to ensure that these acknowledgment(s) are timely submitted to the Board. In the
27 event of a change in the person(s) serving the role(s) described in (a), (b), or (c) during the term
28 of probation, Respondent shall cause the person(s) taking over the role(s) to report to the Board in

1 writing within fifteen (15) days of the change acknowledging that he or she has read the Decision
2 in Case number 7548, and the terms and conditions imposed thereby.

3 If Respondent works for or is employed by or through an employment service, Respondent
4 must notify the person(s) described in (a), (b), and (c) above at every entity licensed by the Board
5 of the Decision in Case number 7548, and the terms and conditions imposed thereby in advance
6 of Respondent commencing work at such licensed entity. A record of this notification must be
7 provided to the Board upon request.

8 Furthermore, within thirty (30) days of the effective date of this Decision, and within fifteen
9 (15) days of Respondent undertaking any new employment by or through an employment service,
10 Respondent shall cause the person(s) described in (a), (b), and (c) above at the employment
11 service to report to the Board in writing acknowledging that he or she has read the Decision in
12 Case number, and the terms and conditions imposed thereby. It shall be Respondent's
13 responsibility to ensure that these acknowledgment(s) are timely submitted to the Board.

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

17 "Employment" within the meaning of this provision includes any full-time, part-time,
18 temporary, relief, or employment/management service position as a pharmacist, or any position
19 for which a pharmacist is a requirement or criterion for employment, whether the Respondent is
20 an employee, independent contractor or volunteer.

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

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

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

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

27 During the period of probation, Respondent shall not supervise any intern pharmacist, be
28 the pharmacist-in-charge, designated representative-in-charge, responsible manager or other

1 compliance supervisor of any entity licensed by the Board, nor serve as a consultant. Assumption
2 of any such unauthorized supervision responsibilities shall be considered a violation of probation.

3 **9. Reimbursement of Board Costs**

4 As a condition precedent to successful completion of probation, Respondent shall pay to the
5 Board its costs of investigation and prosecution in the amount of \$3,688. Respondent shall make
6 said payments as follows: Beginning on the effective date of the Decision and Order, and on the
7 first of each month thereafter, Respondent shall pay \$150.00 to the Board until the costs are paid
8 in full.

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

12 Respondent shall be permitted to pay these costs in a payment plan approved by the Board
13 or its designee, so long as full payment is completed no later than one (1) year prior to the end
14 date of probation.

15 **10. Probation Monitoring Costs**

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

20 **11. Status of License**

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

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

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

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

Upon acceptance of the surrender, Respondent shall relinquish his pocket and/or wall license, including any indicia of licensure not previously provided to the Board within ten (10) days of notification by the Board that the surrender is accepted if not already provided. Respondent may not reapply for any license from the Board for three (3) years from the effective date of the surrender. Respondent shall meet all requirements applicable to the license sought as of the date the application for that license is submitted to the Board, including any outstanding costs, and all of the charges and allegations contained in First Amended Accusation No. 7548 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the application or petition.

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

Except during periods of suspension, Respondent shall, at all times while on probation, be employed as a pharmacist in California for a minimum of eight (80) hours per calendar month, unless otherwise determined by the Pharmacist Recovery Program. Any month during which this minimum is not met shall extend the period of probation by one month. During any such period of insufficient employment, Respondent must nonetheless comply with all terms and conditions of probation, unless Respondent receives a waiver in writing from the Board or its designee.

If Respondent does not practice as a pharmacist in California for the minimum number of hours in any calendar month, for any reason (including vacation), Respondent shall notify the Board in writing within ten (10) days of the conclusion of that calendar month. This notification

1 shall include at least: the date(s), location(s), and hours of last practice; the reason(s) for the
2 interruption or reduction in practice; and the anticipated date(s) on which Respondent will resume
3 practice at the required level. Respondent shall further notify the Board in writing within ten (10)
4 days following the next calendar month during which Respondent practices as a pharmacist in
5 California for the minimum of hours. Any failure to timely provide such notification(s) shall be
6 considered a violation of probation.

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

11 14. **Violation of Probation**

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

18 If Respondent violates probation in any respect, the Board, after giving Respondent notice
19 and an opportunity to be heard, may revoke probation and carry out the disciplinary Order that
20 was stayed. If a petition to revoke probation or an accusation is filed against Respondent during
21 probation, or the preparation of an accusation or petition to revoke probation is requested from
22 the Office of the Attorney General, the Board shall have continuing jurisdiction and the period of
23 probation shall be automatically extended until the petition to revoke probation or accusation is
24 heard and decided, and all of the charges and allegations contained in First Amended Accusation
25 No. 7548 shall be deemed to be true, correct and admitted by Respondent.

26 15. **Completion of Probation**

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

16. **Pharmacists Recovery Program (PRP)**

1 By no later than ten (10) days after the effective date of this Decision, Respondent shall
2 have completed all of the following: contacted the Pharmacists Recovery Program (PRP) for
3 evaluation; enrolled in the PRP; completed, signed, and returned the treatment contract as well as
4 any addendums required or suggested by the PRP; successfully completed registration for any
5 drug or alcohol testing mandated by the treatment contract and/or by enrollment in the PRP; and
6 begun compliance with the drug or alcohol testing protocol(s). Respondent shall successfully
7 participate in the PRP and complete the treatment contract and any addendums required or
8 suggested by the PRP. The costs for PRP participation shall be borne by the Respondent.

9 If Respondent is currently enrolled in the PRP, said participation is now mandatory and as
10 of the effective date of this Decision is no longer considered a self-referral under Business and
11 Professions Code section 4362 (a)(2). Respondent shall successfully participate in and complete
12 his or her current contract and any subsequent addendums with the PRP.

13 Respondent shall pay administrative fees as invoiced by the PRP or its designee. Fees not
14 timely paid to the PRP shall constitute a violation of probation. The Board will collect unpaid
15 administrative fees as part of the annual probation monitoring costs if not submitted to the PRP.

16 Any of the following shall result in the automatic suspension of practice by Respondent and
17 shall be considered a violation of probation:

18 Failure to contact, complete enrollment, and execute and return the treatment contract with
19 the PRP, including any addendum(s), within ten (10) days of the effective date of the Decision as
20 directed by the PRP;

21 Failure to complete registration for any drug or alcohol testing mandated by the treatment
22 contract and/or by the PRP, and begin compliance with the testing protocol(s), within ten (10)
23 days of the effective date of the Decision as directed by the PRP;

24 Failure to comply with testing protocols regarding daily check-in and/or failure to complete
25 a mandated test as directed by the PRP;

26 Any report from the PRP of material non-compliance with the terms and conditions of the
27 treatment contract and/or any addendum(s); or
28

1 Termination by the PRP for non-compliance, failure to derive benefit, or as a public risk.
2 Respondent may not resume the practice of pharmacy until notified by the Board in writing.
3 Probation shall be automatically extended until Respondent successfully completes the
4 PRP. The Board will provide notice of any such suspension or extension of probation.

5 During any suspension, Respondent shall not enter any pharmacy area or any portion of the
6 licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug
7 retailer, or any other distributor of drugs which is licensed by the Board, or any manufacturer, or
8 any area where dangerous drugs and/or dangerous devices or controlled substances are
9 maintained. Respondent shall not practice as a pharmacist nor do any act involving drug
10 selection, selection of stock, manufacturing, compounding, dispensing or patient consultation; nor
11 shall Respondent manage, administer, or be a consultant to any licensee of the Board, or have
12 access to or control the Ordering, distributing, manufacturing or dispensing of dangerous drugs
13 and/or dangerous devices or controlled substances.

14 During any suspension, Respondent shall not engage in any activity that requires the
15 professional judgment of and/or licensure as a pharmacist. Respondent shall not direct or control
16 any aspect of the practice of pharmacy, or of the manufacturing, distributing, wholesaling, or
17 retailing of dangerous drugs and/or dangerous devices or controlled substances.

18 Failure to comply with any requirement or deadline stated by this term shall be considered a
19 violation of probation.

20 **17. Drug and Alcohol Testing**

21 Respondent, at his own expense, shall participate in testing as directed by the Board or its
22 designee for the detection of alcohol, controlled substances, and dangerous drugs and/or
23 dangerous devices. Testing protocols may include biological fluid testing (urine, blood),
24 breathalyzer, hair follicle testing, or other testing protocols as directed by the Board or its
25 designee. All testing must be pursuant to an observed testing protocol, unless Respondent is
26 informed otherwise in writing by the Board or its designee. Respondent may be required to
27 participate in testing for the entire probation period and frequency of testing will be determined
28 by the Board or its designee.

1 By no later than thirty (30) days after the effective date of this Decision, Respondent shall
2 have completed all of the following tasks: enrolled and registered with an approved drug and
3 alcohol testing vendor; provided that vendor with any documentation, and any information
4 necessary for payment by Respondent; commenced testing protocols, including all required
5 contacts with the testing vendor to determine testing date(s); and begun testing. At all times,
6 Respondent shall fully cooperate with the testing vendor, and with the Board or its designee, with
7 regard to enrollment, registration, and payment for, and compliance with, testing. Any failure to
8 cooperate timely shall be considered a violation of probation.

9 Respondent may be required to test on any day, including weekends and holidays.
10 Respondent is required to make daily contact with the testing vendor to determine if a test is
11 required, and if a test is required must submit to testing on the same day.

12 Prior to any vacation or other period of absence from the area where the approved testing
13 vendor provides services, Respondent shall seek and receive approval from the Board or its
14 designee to use an alternate testing vendor to ensure testing can occur. Upon approval,
15 Respondent shall enroll and register with the approved alternate drug testing vendor, provide to
16 that alternate vendor any documentation required by the vendor, including any necessary payment
17 by Respondent. During the period of absence of the area, Respondent shall commence testing
18 protocols with the alternate vendor, including required daily contacts with the testing vendor to
19 determine if testing is required, and required testing. Any failure to timely seek or receive
20 approval from the Board or its designee, or to timely enroll and register with, timely commence
21 testing protocols with, or timely undergo testing with, the alternate testing vendor, shall be
22 considered a violation of probation.

23 Upon detection of an illicit drug, controlled substance or dangerous drug, the Board or its
24 designee may require Respondent to timely provide documentation from a licensed practitioner
25 authorized to prescribe the detected substance demonstrating that the substance was administered
26 or ingested pursuant to a legitimate prescription issued as a necessary part of treatment. All such
27 documentation shall be provided by Respondent within ten (10) days of being requested.
28

1 Any of the following shall be considered a violation of probation and shall result in
2 Respondent being immediately suspended from practice as a pharmacist until notified by the
3 Board in writing that he may resume practice: failure to timely complete all of the steps required
4 for enrollment/registration with the drug testing vendor, including making arrangements for
5 payment; failure to timely commence drug testing protocols; failure to contact the drug testing
6 vendor as required to determine testing date(s); failure to test as required; failure to timely supply
7 documentation demonstrating that a detected substance was taken pursuant to a legitimate
8 prescription issued as a necessary part of treatment; and/or detection through testing of alcohol, or
9 of an illicit drug, or of a controlled substance or dangerous drug absent documentation that the
10 detected substance was taken pursuant to a legitimate prescription and a necessary treatment. In
11 the event of a suspension Ordered after detection through testing of alcohol, an illicit drug, or of a
12 controlled substance or dangerous drug absent documentation that the detected substance was
13 taken pursuant to a legitimate prescription and a necessary treatment, the Board or its designee
14 shall inform Respondent of the suspension and inform him to immediately leave work, and shall
15 notify Respondent's employer(s) and work site monitor(s) of the suspension.

16 During any such suspension, Respondent shall not enter any pharmacy area or any portion
17 of the licensed premises of a wholesaler, third-party-logistics provider, veterinary food-animal
18 drug retailer, or any other distributor of drugs which is licensed by the Board, or any
19 manufacturer, or any area where dangerous drugs and/or dangerous devices or controlled
20 substances are maintained. Respondent shall not practice pharmacy nor do any act involving drug
21 selection, selection of stock, manufacturing, compounding, dispensing or patient consultation; nor
22 shall Respondent manage, administer, or be a consultant to any licensee of the Board, or have
23 access to or control the ordering, distributing, manufacturing or dispensing of dangerous drugs
24 and/or dangerous devices and controlled substances.

25 During any such suspension, Respondent shall not engage in any activity that requires the
26 professional judgment of and/or licensure as a pharmacist. Respondent shall not direct or control
27 any aspect of the practice of pharmacy, or of the manufacturing, distributing, wholesaling, or
28 retailing of dangerous drugs and/or dangerous devices.

1 Failure to comply with any such suspension shall be considered a violation of probation.
2 Failure to comply with any requirement or deadline stated by this term shall be considered a
3 violation of probation.

4 **18. Notification of Departure**

5 Prior to leaving the probationary geographic area designated by the Board or its designee
6 for a period greater than twenty-four (24) hours, Respondent shall notify the Board verbally and
7 in writing of the dates of departure and return. Failure to comply with this provision shall be
8 considered a violation of probation.

9 **19. Abstain from Drugs and Alcohol**

10 Respondent shall completely abstain from the possession or use of alcohol, controlled
11 substances, illicit drugs, dangerous drugs and/or dangerous devices, or their associated
12 paraphernalia, except when possessed or used pursuant to a legitimate prescription issued as a
13 necessary part of treatment. Respondent shall ensure that he is not in the same physical location
14 as individuals who are using illicit substances even if Respondent is not personally ingesting the
15 drugs. Any possession or use of alcohol, dangerous drugs and/or dangerous devices or controlled
16 substances, or their associated paraphernalia for which a legitimate prescription has not been
17 issued as a necessary part of treatment, or any physical proximity to persons using illicit
18 substances, shall be considered a violation of probation.

19 **20. Prescription Coordination and Monitoring of Prescription Use**

20 Within thirty (30) days of the effective date of this Decision, Respondent shall submit to the
21 Board, for its prior approval, the name and qualifications of a single physician, nurse practitioner,
22 physician assistant, or psychiatrist of Respondent's choice, who shall be aware of the
23 Respondent's history with the use of controlled substances and dangerous drugs and who will
24 coordinate and monitor any prescriptions for Respondent for dangerous drugs and/or dangerous
25 devices, controlled substances or mood-altering drugs. The approved practitioner shall be
26 provided with a copy of the Board's Accusation and Decision. A record of this notification must
27 be provided to the Board or its designee upon request. Respondent shall sign a release
28 authorizing the practitioner to communicate with the Board or its designee about Respondent's

1 treatment(s). The coordinating physician, nurse practitioner, physician assistant, or psychiatrist
2 shall report to the Board on a quarterly basis for the duration of probation regarding Respondent's
3 compliance with this condition. If any substances considered addictive have been prescribed, the
4 report shall identify a program for the time limited use of any such substances. The Board or its
5 designee may require that the single coordinating physician, nurse practitioner, physician assistant
6 or psychiatrist be a specialist in addictive medicine, or consult a specialist in addictive medicine.
7 Should Respondent, for any reason, cease supervision by the approved practitioner, Respondent
8 shall notify the Board or its designee immediately and, within thirty (30) days of ceasing
9 supervision, submit the name of a replacement physician, nurse practitioner, physician assistant,
10 or psychiatrist of Respondent's choice to the Board or its designee for its prior approval. Failure
11 to timely submit the selected practitioner or replacement practitioner to the Board or its designee
12 for approval, or to ensure the required quarterly reporting thereby, shall be considered a violation
13 of probation.

14 If at any time an approved practitioner determines that Respondent is unable to practice
15 safely or independently as a pharmacist, the practitioner shall notify the Board or its designee
16 immediately by telephone and follow up by written letter within three (3) working days. Upon
17 notification from the Board or its designee of this determination, Respondent shall be
18 automatically suspended and shall not resume practice as a pharmacist until notified by the Board
19 or its designee that practice may be resumed.

20 During any suspension, Respondent shall not enter any pharmacy area or any portion of the
21 licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug
22 retailer, or any other distributor of drugs which is licensed by the Board, or any manufacturer, or
23 any area where dangerous drugs and/or dangerous devices or controlled substances are
24 maintained. Respondent shall not practice pharmacy nor do any act involving drug selection,
25 selection of stock, manufacturing, compounding, dispensing or patient consultation; nor shall
26 Respondent manage, administer, or be a consultant to any licensee of the Board, or have access to
27 or control the Ordering, distributing, manufacturing or dispensing of dangerous drugs and/or
28

1 dangerous devices and controlled substances. Respondent shall not resume practice until notified
2 by the Board.

3 During any suspension, Respondent shall not engage in any activity that requires the
4 professional judgment and/or licensure as a pharmacist. Respondent shall not direct or control
5 any aspect of the practice of pharmacy or of the manufacturing, distributing, wholesaling, or
6 retailing of dangerous drugs and/or dangerous devices or controlled substances.

7 Failure to comply with any requirement or deadline stated by this term shall be considered a
8 violation of probation.

9 **21. Facilitated Group Recovery and/or Support Meetings**

10 Within thirty (30) days of the effective date of this Decision, Respondent shall begin
11 regular attendance at a group recovery and/or support meeting that is run by a trained facilitator
12 approved in advance by the Board or its designee. The required frequency of group meeting
13 attendance shall be determined by the Board or its designee. Respondent shall continue regular
14 attendance as directed at an approved facilitated group meeting until the Board or its designee
15 advises the Respondent in writing that he may cease regular attendance. Respondent shall
16 provide signed and dated documentation of attendance as required with each quarterly report.
17 Failure to attend as required or to submit documentation of attendance shall be considered a
18 violation of probation.

19 If Respondent is required to participate in the PRP, compliance with this term can be
20 demonstrated through that program. Where Respondent is enrolled in the PRP, participation as
21 required in a facilitated group meeting approved by the PRP shall be sufficient for satisfaction of
22 this requirement. Any deviation from participation requirements for the PRP-approved group
23 shall be considered a violation of probation.

24 **22. Attend Substance Abuse Recovery Relapse Prevention and Support Groups**

25 Within thirty (30) days of the effective date of this Decision, Respondent shall begin
26 regular attendance at a recognized and established substance abuse recovery support group in
27 California (e.g., Alcoholics Anonymous, Narcotics Anonymous, etc.) which has been approved
28 by the Board or its designee. Respondent must attend the number of group meetings per week or

1 month directed by the Board or its designee, which shall typically be at least one per week.
2 Respondent shall continue regular attendance and submit signed and dated documentation
3 confirming attendance with each quarterly report for the duration of probation. Failure to attend
4 or submit documentation thereof shall be considered a violation of probation.

5 Where Respondent is enrolled in the PRP, participation as required in a recovery group
6 meeting approved by the PRP shall be sufficient for satisfaction of this requirement. Any
7 deviation from participation requirements for the PRP-approved group shall be considered a
8 violation of probation.

9 **23. Work Site Monitor**

10 Within ten (10) days of the effective date of this Decision, Respondent shall identify a work
11 site monitor, for prior approval by the Board or its designee, who shall be responsible for
12 supervising Respondent during working hours. Respondent shall be responsible for ensuring that
13 the work site monitor reports in writing to the Board monthly or on another schedule as directed
14 by the Board or its designee. Should the designated work site monitor suspect at any time during
15 the probationary period that Respondent has abused alcohol or drugs, he or she shall notify the
16 Board immediately.

17 In the event of suspected abuse, the monitor shall make at least oral notification within one
18 (1) business day of the occurrence, and shall be followed by written notification within two (2)
19 business days of the occurrence. If, for any reason, including change of employment, Respondent
20 is no longer able to be monitored by the approved work site monitor, within ten (10) days
21 Respondent shall designate a new work site monitor for approval by the Board or its designee.
22 Failure to timely identify an acceptable initial or replacement work site monitor, or to ensure
23 monthly reports are submitted to the Board by the monitor, shall be considered a violation of
24 probation.

25 Within thirty (30) days of being approved by the Board or its designee, the work site
26 monitor shall sign an affirmation that he or she has reviewed the terms and conditions of
27 Respondent's disciplinary Order and agrees to monitor Respondent. The work site monitor shall
28 at least:

- 1) Have regular face-to-face contact with Respondent in the work environment, at least once per week or with greater frequency if required by the Board or its designee;
- 2) Interview other staff in the office regarding Respondent's behavior, if applicable; and
- 3) Review Respondent's work attendance.

The written reports submitted to the Board or its designee by the work site monitor shall include at least the following information: Respondent's name and license number; the monitor's name, license number (if applicable) and work site location; the date(s) the monitor had face-to-face contact with Respondent; the staff interviewed, if applicable; an attendance report; notes on any changes in Respondent's behavior or personal habits; notes on any indicators that may lead to substance abuse; and the work site monitor's signature.

Respondent shall complete the required consent forms and sign an agreement with the work site monitor and the Board to allow the Board to communicate with the work site monitor.

24. Remedial Education

Within sixty (60) days of the effective date of this decision, Respondent shall submit to the board or its designee, for prior approval, an appropriate program of remedial education related to the grounds for discipline. The program of remedial education shall consist of at least six (6) hours, with at least 50% in-person or live webinar, which shall be completed within a year at Respondent's own expense. All remedial education shall be in addition to, and shall not be credited toward, continuing education (CE) courses used for license renewal purposes for pharmacists.

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

Following the completion of each course, the Board or its designee may require the Respondent, at his own expense, to take an approved examination to test the Respondent's knowledge of the course. If the Respondent does not achieve a passing score on the examination that course shall not count towards satisfaction of this term. Respondent shall take another course

1 approved by the Board in the same subject area.

2 **25. Ethics Course**

3 Within sixty (60) calendar days of the effective date of this decision, Respondent shall
4 enroll in a course in ethics, at Respondent's expense, approved in advance by the Board or its
5 designee that complies with Title 16 California Code of Regulations section 1773.5. Respondent
6 shall provide proof of enrollment upon request. Respondent is required to complete the 6-month
7 and 12- month ethics follow up courses in order to be compliance with this condition. Within five
8 (5) days of completion, Respondent shall submit a copy of the certificate of completion to the
9 Board or its designee.

10 **26. No Ownership or Management of Licensed Premises**

11 Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager,
12 administrator, member, officer, director, trustee, associate, or partner of any business, firm,
13 partnership, or corporation currently or hereinafter licensed by the Board. Respondent shall sell
14 or transfer any legal or beneficial interest in any entity licensed by the Board within ninety (90)
15 days following the effective date of this Decision and shall immediately thereafter provide written
16 proof thereof to the Board. Failure to timely divest any legal or beneficial interest(s) or provide
17 documentation thereof shall be considered a violation of probation.

18 **ACCEPTANCE**

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

24
25 DATED: _____

26 MAYAR SADEGHI
27 *Respondent*

1 approved by the Board in the same subject area.

2 **25. Ethics Course**

3 Within sixty (60) calendar days of the effective date of this decision, Respondent shall
4 enroll in a course in ethics, at Respondent's expense, approved in advance by the Board or its
5 designee that complies with Title 16 California Code of Regulations section 1773.5. Respondent
6 shall provide proof of enrollment upon request. Respondent is required to complete the 6-month
7 and 12- month ethics follow up courses in order to be compliance with this condition. Within five
8 (5) days of completion, Respondent shall submit a copy of the certificate of completion to the
9 Board or its designee.

10 **26. No Ownership or Management of Licensed Premises**

11 Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager,
12 administrator, member, officer, director, trustee, associate, or partner of any business, firm,
13 partnership, or corporation currently or hereinafter licensed by the Board. Respondent shall sell
14 or transfer any legal or beneficial interest in any entity licensed by the Board within ninety (90)
15 days following the effective date of this Decision and shall immediately thereafter provide written
16 proof thereof to the Board. Failure to timely divest any legal or beneficial interest(s) or provide
17 documentation thereof shall be considered a violation of probation.

18 **ACCEPTANCE**

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

24
25 DATED: 6/5/24


26 MAYAR SADEGHI
27 Respondent
28

1 I have read and fully discussed with Respondent Mayar Sadeghi the terms and conditions
2 and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve
3 its form and content.

4
5 DATED: _____
6 ROBERT WEINBERG, ESQ.
7 *Attorney for Respondent*

8 **ENDORSEMENT**

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

11 DATED: _____
12 Respectfully submitted,
13 ROB BONTA
14 Attorney General of California
15 GREGORY J. SALUTE
16 Supervising Deputy Attorney General
17
18 NICOLE R. TRAMA
19 Deputy Attorney General
20 *Attorneys for Complainant*
21
22
23
24
25
26
27
28

1 I have read and fully discussed with Respondent Mayar Sadeghi the terms and conditions
2 and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve
3 its form and content.

4
5 DATED: 6/5/24


ROBERT WEINBERG, ESQ.
Attorney for Respondent

6
7
8 **ENDORSEMENT**

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

11 DATED: 6/5/24

Respectfully submitted,

12
13 ROB BONTA
Attorney General of California
14 GREGORY J. SALUTE
Supervising Deputy Attorney General

15 *Nicole R. Trama*

16 NICOLE R. TRAMA
17 Deputy Attorney General
Attorneys for Complainant
18
19
20
21
22
23
24
25
26
27
28

Exhibit A

First Amended Accusation No. 7548

1 ROB BONTA
Attorney General of California
2 GREGORY J. SALUTE
Supervising Deputy Attorney General
3 NICOLE R. TRAMA
Deputy Attorney General
4 State Bar No. 263607
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9441
7 Facsimile: (619) 645-2061
Attorneys for Complainant

8
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. 7548

14 **LONGS DRUG STORES CALIFORNIA,**
15 **LLC, DBA CVS/PHARMACY #3058**
16 **26180 Iris Ave.**
17 **Moreno Valley, CA 92555**
18 **MARIO RAOUF ISKANDER, PIC**

FIRST AMENDED ACCUSATION

19 **Pharmacy Permit No. PHY 49554,**

20 **and**

21 **MARIO RAOUF ISKANDER**
22 **8181 Artesia Blvd.**
23 **Buena Park, CA 90621**

24 **Pharmacist License No. RPH 84643**

25 **and**

26 **MAYAR SADEGHI**
27 **25102 Camino Del Mar #I**
28 **Laguna Niguel, CA 92677**

Pharmacist License No. RPH 85076

Respondents.

1 **PARTIES**

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

5 2. On or about November 10, 2008, the Board of Pharmacy issued Pharmacy Permit
6 Number PHY 49554 to Longs Drug Stores California, LLC, dba CVS/Pharmacy #3058
7 (Respondent Pharmacy). The Pharmacy Permit was in full force and effect at all times relevant to
8 the charges brought herein and will expire on November 1, 2024, unless renewed.

9 3. On or about August 2, 2021, the Board of Pharmacy issued Pharmacist License
10 Number RPH 84643 to Mario Raouf Iskander (Respondent Iskander). The Pharmacist License
11 was in full force and effect at all times relevant to the charges brought herein and will expire on
12 January 31, 2025, unless renewed.

13 4. On or about September 3, 2021, The Board of Pharmacy issued Pharmacist License
14 Number RPH 85076 to Mayar Sadeghi (Respondent Sadeghi). The Pharmacist License was in
15 full force and effect at all times relevant to the charges brought herein and will expire on February
16 28, 2025, unless renewed.

17 **JURISDICTION**

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

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

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

26 8. Code section 4300.1 states:

27 The expiration, cancellation, forfeiture, or suspension of a board-issued license
28 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

1 licensee shall not deprive the board of jurisdiction to commence or proceed with any
2 investigation of, or action or disciplinary proceeding against, the licensee or to render
3 a decision suspending or revoking the license.

4 STATUTORY PROVISIONS

5 9. Code section 4022 states:

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

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

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

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

16 10. Code section 4052.8 states:

17 (a) In addition to the authority provided in paragraph (11) of subdivision (a) of
18 Section 4052, a pharmacist may independently initiate and administer any vaccine
19 that has been approved or authorized by the federal Food and Drug Administration
20 and received a federal Advisory Committee on Immunization Practices individual
21 vaccine recommendation published by the federal Centers for Disease Control and
22 Prevention (CDC) for persons three years of age and older.

23 (b) In order to initiate and administer an immunization described in subdivision
24 (a), a pharmacist shall do all of the following:

25 (1) Complete an immunization training program endorsed by the CDC or the
26 Accreditation Council for Pharmacy Education that, at a minimum, includes hands-on
27 injection technique, clinical evaluation of indications and contraindications of
28 vaccines, and the recognition and treatment of emergency reactions to vaccines, and
shall maintain that training.

(2) Be certified in basic life support.

(3) Comply with all state and federal recordkeeping and reporting requirements,
including providing documentation to the patient's primary care provider and entering
information in the appropriate immunization registry designated by the immunization
branch of the State Department of Public Health.

(c) A pharmacist administering immunizations pursuant to this section, or
paragraph (11) of subdivision (a) of Section 4052, may also initiate and administer
epinephrine or diphenhydramine by injection for the treatment of a severe allergic
reaction.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

....

12. Code section 4113, subdivision (c) states:

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

13. Code section 4115 states:

(a) A pharmacy technician may perform packaging, manipulative, repetitive, or other nondiscretionary tasks only while assisting, and while under the direct supervision and control of, a pharmacist. The pharmacist shall be responsible for the duties performed under his or her supervision by a technician.

...

(c) This section does not authorize a pharmacy technician to perform any act requiring the exercise of professional judgment by a pharmacist.

....

14. Code section 4301 states in pertinent part:

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

...

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

...

1 (j) The violation of any of the statutes of this state, or 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 any other state or federal regulatory
8 agency.

9 15. Code section 4306.5, subdivision (a) states:

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

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

16 16. Code section 4307, subdivision (a) states:

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

(1) 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.

17. Health and Safety Code section 11165, subdivision (d) states:

(d) For each prescription for a Schedule II, Schedule III, Schedule IV, or
Schedule V controlled substance, as defined in the controlled substances schedules in
federal law and regulations, specifically Sections 1308.12, 1308.13, 1308.14, and
1308.15, respectively, of Title 21 of the Code of Federal Regulations, the dispensing
pharmacy, clinic, or other dispenser shall report the following information to the
department or contracted prescription data processing vendor as soon as reasonably
possible, but not more than one working day after the date a controlled substance is
released to the patient or patient's representative, in a format specified by the
department:

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

5 (2) The prescriber's category of licensure, license number, national provider
6 identifier (NPI) number, if applicable, the federal controlled substance registration
7 number, and the state medical license number of a prescriber using the federal
8 controlled substance registration number of a government-exempt facility.

9 (3) Pharmacy prescription number, license number, NPI number, and federal
10 controlled substance registration number.

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

12 (5) Quantity of the controlled substance dispensed.

13 (6) The International Statistical Classification of Diseases (ICD) Code
14 contained in the most current ICD revision, or any revision deemed sufficient by the
15 State Board of Pharmacy, if available.

16 (7) Number of refills ordered.

17 (8) Whether the drug was dispensed as a refill of a prescription or as a first-time
18 request.

19 (9) Prescribing date of the prescription.

20 (10) Date of dispensing of the prescription.

21 (11) The serial number for the corresponding prescription form, if applicable.

22 18. Health and Safety Code section 11170 provides that no person shall prescribe,
23 administer or furnish a controlled substance to themselves.

24 **REGULATORY PROVISIONS**

25 19. California Code of Regulations, title 16, section 1707.2 states:

26 (a) A pharmacist shall provide oral consultation to his or her patient or the
27 patient's agent in all settings:

28 (1) upon request;

(2) whenever the pharmacist deems it warranted in the exercise of his or her
professional judgment;

(3) whenever the prescription drug has not previously been dispensed to a
patient; or

(4) whenever a prescription drug not previously dispensed to a patient in the
same dosage form, strength or with the same written directions, is dispensed by the
pharmacy.

....

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

20. California Code of Regulations, title 16, section 1716 states in pertinent part:

Pharmacists shall not deviate from the requirements of a prescription except upon the prior consent of the prescriber or to select the drug product in accordance with Section 4073 of the Business and Professions Code.

...

21. California Code of Regulations, title 16, section 1776.1 states:

(a) Pharmacies may provide take-back services to the public. Retail pharmacies and hospital/clinics with onsite pharmacies may maintain collection receptacles in their facilities. Pharmacies may offer drug take-back services as specified in section 1776.4 in skilled nursing facilities licensed under Health and Safety Code section 1250(c).

(b) There are multiple federal, state and local requirements governing the collection and destruction of dangerous drugs. Pharmacies are expected to know and adhere to these requirements when operating a prescription drug take-back program.

(c) For purposes of this article, prescription drugs means dangerous drugs as defined by Business and Professions Code section 4022, which includes controlled substances. Controlled substances may be commingled in collection receptacles or mail back envelopes or packages with other dangerous drugs.

(d) Once drugs are deposited into a collection receptacle or mail back envelopes or packages by a consumer, they are not to be removed, counted, sorted or otherwise individually handled.

(e) The collection receptacle shall contain signage that includes:

(1) The name and phone number of the responsible pharmacy;

(2) Medical sharps and needles (e.g., insulin syringes) shall not be deposited;
and

(3) Consumers may deposit prescription drugs including Schedule II-V controlled substances.

(f) Prescription drugs that are eligible for collection as part of drug take-back services maintained by pharmacies are only those prescription drugs that have been dispensed by any pharmacy or practitioner to a consumer. Dangerous drugs that have not been dispensed to consumers for use (such as outdated drug stock in a pharmacy, drug samples provided to a medical practitioner or medical waste) may not be collected as part of a pharmacy's drug take-back service.

(g) As part of its drug take-back services, a pharmacy shall not:

(1) Review, accept, count, sort, or otherwise individually handle any prescription drugs from consumers.

1 (2) Accept or possess prescription drugs from skilled nursing facilities,
residential care homes, health care practitioners or any other entity.

2 (3) Dispose of quarantined, recalled or outdated prescription drugs from
3 pharmacy stock.

4 (h) A pharmacy must be registered with the federal DEA as a collector for
purposes of maintaining a prescription drug take-back collection receptacle. Such
5 pharmacies cannot employ anyone convicted of a felony related to controlled
substances, or anyone who has had a DEA permit denied, surrendered or revoked.

6 (i) Any pharmacy that maintains a drug take-back collection receptacle as
7 authorized in this article shall notify the board in writing within 30 days of
establishing the collection program. Additionally:

8 (1) Any pharmacy that ceases to maintain a drug take-back collection receptacle
shall notify the board in writing within 30 days.

9 (2) Any pharmacy maintaining a collection receptacle shall disclose to the
10 board that it provides such services annually at the time of renewal of the pharmacy
license, and shall identify all locations where its collection receptacles are located.

11 (3) Any tampering with a collection receptacle or theft of deposited drugs shall
12 be reported to the board in writing within 14 days.

13 (4) Any tampering, damage or theft of a removed liner shall be reported to the
14 board in writing within 14 days.

15 (j) If the pharmacy ceases to maintain a registered collection receptacle, the
pharmacy must notify the DEA within 30 days.

16 (k) A pharmacy shall not provide take-back services to consumers if, in the
17 professional judgment of the pharmacist-in-charge, the pharmacy cannot comply with
the provisions of this article or the DEA rules.

18 (l) A pharmacy shall not provide take-back services to consumers if the
19 pharmacy or the pharmacist-in-charge is on probation with the board, and, if the
pharmacy had previously provided take-back services, the pharmacist-in-charge shall
20 notify the board and the DEA as required in subsections (i) and (j), above.

21 22. California Code of Regulations, title 16, section 1776.3 states:

22 (a) A pharmacy may maintain a collection receptacle for the public to deposit
23 their unwanted prescription drugs for destruction. The pharmacy is responsible for the
management and maintenance of the receptacle. The receptacle shall be substantially
24 constructed, with a permanent outer container and a removable inner liner. The
collection receptacle shall be locked at all times to prevent access to the inner liner.

25 ...

26 (e) A pharmacy shall direct consumers to directly deposit drugs into the
27 collection receptacle. A pharmacy shall not accept, count, sort or otherwise handle
prescription drugs from consumers.

28 ...

1 (g) The liner shall be removable as specified in this section. The receptacle
2 shall allow the public to deposit prescription drugs into the receptacle for containment
3 into the inner liner, without permitting access to or removal of prescription drugs
4 already deposited into the collection receptacle and liner. Once a prescription drug or
5 any other item is placed in the collection receptacle, the prescription drug or item
6 cannot be removed, counted, sorted or otherwise individually handled.

7 . . .

8 **COST RECOVERY**

9 23. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
10 administrative law judge to direct a licentiate found to have committed a violation or violations of
11 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
12 enforcement of the case.

13 **DRUGS**

14 24. Alprazolam, the generic for Xanax, is a Schedule IV controlled substance pursuant to
15 Health and Safety Code section 11057(d)(1) and a dangerous drug pursuant to Business and
16 Professions Code section 4022.

17 **FACTUAL ALLEGATIONS**

18 **Board's First Investigation**

19 25. Respondent Iskander was the Pharmacist-in-Charge at Respondent Pharmacy, a retail
20 community chain pharmacy located in Moreno Valley, California.

21 26. During a Board inspection at Respondent Pharmacy, the Board inspector discovered
22 that Respondents' immunization practices allowed pharmacy technicians and clerks to
23 independently initiate vaccinations on patients. The circumstances are as follows: Respondent
24 Pharmacy offered various vaccinations on site, including COVID-19, influenza, shingles,
25 pneumonia, Tdap, hepatitis A, and hepatitis B. Vaccine requests are initiated by the pharmacy, or
26 requested by the customer, or upon prescription by a prescriber. Respondent Pharmacy had
27 prompts on the pharmacy registers and software directed at offering vaccines. There was signage
28 displayed at each cash register indicating, "Remember to ask: Would you like a flu shot today?"
and "Remember to ask: Are you up to date on your flu and COVID-19 vaccinations?" Pharmacy
technicians were trained to ask about the flu vaccine and if there was an "immunization gap"
prompt shown at the register, the pharmacy technician or clerk would ask the patient about the

1 opportunity to receive a vaccine. An “immunization gap” is displayed when the pharmacy
2 software detects that a patient was eligible for a certain vaccine based on the patient’s vaccine
3 history, age, and the medications that they took.¹ There was no way to bypass the “immunization
4 gap” prompts and the technician/clerk was required to ask about the vaccine in order to proceed
5 with the transaction. An example of an “immunization gap” prompt is: “The Pharmacist
6 recommends these vaccines to help keep you healthy. We can administer these for you today.”
7 Respondent Pharmacy’s technicians/clerks would offer the vaccines when the prompts appeared.
8 If the patient refused, then they would need to select the reason for the refusal. If the patient
9 agreed to the vaccine, then the technician/clerk would instruct the patient to walk to the drop-off
10 window in order to process the vaccine. The technician/clerk at Respondent Pharmacy did not
11 review the vaccine opportunity with a pharmacist prior to entering it into the system for
12 processing. Pharmacy technicians are able to type the vaccine into the computer prior to the
13 pharmacist reviewing it. After the vaccine is typed, the pharmacist then verifies the vaccine and
14 will review the patient’s vaccine history as collected by CVS Pharmacy.²

15 27. Respondents’ immunization practices were also in violation of CVS Policy and
16 Procedure. With regard to immunization gaps, the policy indicated: “In California, only a
17 Pharmacist may initiate an immunization prescription. While Pharmacy Interns/Pharmacy
18 Technicians may inform a customer of an immunization gap when prompted during the
19 workflow, if the customer expresses interest in immunization, **the Pharmacy Intern/Pharmacy**
20 **Technician must review the opportunity with the Pharmacist and may only enter the**
21 **opportunity into RxConnect at the direction of the Pharmacist.” (Emphasis Added.)**

23 ¹ In one case, the software detected an “immunization gap” for the flu vaccine because the
24 patient “meets minimum age” and had not history of the flu vaccine in the pharmacy’s software.
25 In another case, the software detected an “immunization gap” for the pneumonia vaccine (Pneumovax
26 20) because the patient used “diabetes meds.” In another case, the software detected an
27 “immunization gap” for pneumonia, Tdap, and Shingles vaccines because the patient “meets
28 minimum age” for all vaccines. In another case, the “immunization gap” recommended Tdap and
HPV vaccines because the patient “meets minimum age.”

² Respondent Iskander believed that CVS Pharmacy obtained the vaccine history from the
California Immunization Registry (CAIR); however, he did not have access to the CAIR website
and he relied on the CVS Pharmacy software system in order to review the patient’s vaccine
history.

1 28. During the Board inspection, the Board inspector also observed pharmacy technicians
2 dispensing new prescriptions to patients without a pharmacist consultation as follows: On
3 December 1, 2022, Patient DR received Neo-Poly-Dex eye drops (RX#1302895) and
4 Erythromycin 0.5% eye ointment (RX#1302163) and Patient TN received Amoxicillin-Clav 875-
5 125 mg (RX#1302758) without an oral consultation by the pharmacist.

6 **Board's Second Investigation**

7 29. On or about June 7, 2023, the Board received a letter and DEA Form-106 from CVS
8 Health, the parent company of Respondent Pharmacy. CVS Health notified the Board that
9 Respondent Pharmacy reported a loss of 120 tablets of alprazolam 1 mg. The notification also
10 provided that the employee responsible for the drug diversion was terminated from employment.
11 It further stated that the employee, Respondent Sadeghi, admitted to taking alprazolam and
12 medications from the drug disposal kiosk, including Lorazepam, Tylenol with Codeine, and
13 Tramadol. Following receipt of this notification, the Board initiated an investigation.

14 30. Respondent Iskander, as PIC of Respondent Pharmacy, informed the Board inspector
15 that Respondent Sadeghi was lacking in his performance, showing up to work “half asleep,
16 shaking, anxious,” and had incorrectly typed, filled and picked up a prescription for alprazolam
17 for Respondent Sadeghi’s dog.³ The prescription was written for “one tablet orally every 6 hours
18 as needed for anxiety” but Respondent Sadeghi typed it for “one tablet orally every 4-6 hours as
19 needed.” On or about May 4, 2023, Respondent Iskander spoke to the veterinarian’s office for
20 Respondent Sadeghi’s dog and was informed that “the owner of the dog [Respondent Sadeghi]
21 exhibited drug substance abuse.” The veterinarian therefore cancelled all remaining refills on the
22 prescription and Respondent Iskander inactivated the prescription in Respondent Pharmacy’s
23 computer on May 4, 2023. However, the next day on May 5, 2023, Respondent Iskander received
24 a call from a pharmacy technician at Respondent Pharmacy informing him that the Respondent
25 Sadeghi was trying to fill the inactivated prescription and that he rewrote it without calling the
26

27 ³ It is against CVS policies and procedures for a pharmacist at CVS to perform data entry,
28 produce or verify controlled substance prescriptions for themselves or a family member living
within the same household.

1 doctor to get authorization. On May 8, 2023, Respondent Iskander confirmed with the
2 veterinarian that the prescription was still cancelled per their last conversation.

3 31. Respondent Sadeghi was also caught going through the “blue bin”⁴ in April, was seen
4 going through a bag of medications left by a patient because the blue bin was full.

5 32. When questioned by a District Asset Protection Leader of CVS Health, Respondent
6 Sadeghi stated that the veterinarian prescribed for his dog a prescription for alprazolam on April
7 17, 2023, with three additional refills, which was filled and picked up on the same day.
8 Respondent Sadeghi further stated that he later noticed that the prescription was inactive and that
9 “someone from the vet’s office called him back and did not give him a reason as to why the
10 prescription as inactive.” Respondent Sadeghi stated that he was able to get authorization from
11 the veterinarian’s office for another prescription with 3 refills on May 5, 2023 over the phone.
12 Respondent admitted that he “made a mistake and did not realize it was every 6 hrs on the first
13 prescription and not every 4-6 hrs.” Respondent Sadeghi also admitted to going through the blue
14 bin where patients drop off expired or extra medication at least 4 times since January 2023. He
15 reported that once the blue bin was full, so he took some medication to another CVS pharmacy in
16 Irvine and left it in their blue bin. The medication included controlled substances (Tramadol,
17 Tylenol with Codeine, and Lorazepam) and non-controlled substances. One witness to the
18 interview noted that Respondent Sadeghi displayed signs and symptoms of benzodiazepine
19 intoxication, including deliberate delivery of words and falling asleep.

20 33. The veterinarian for Respondent Sadeghi’s dog stated that the dog originally
21 presented to the pet hospital on April 16, 2023, for evaluation for back pain, vocalization and
22 inability to move and was given a written prescription for continuation of alprazolam. On April
23 20, 2023, Respondent Sadeghi insisted on receiving a hydrocodone/ homatrophine Schedule II
24 prescription but was declined. On April 23, 2023, the dog returned to the pet hospital and the
25 veterinarian advised that the dog proceed with a MRI, and refer to Veterinary Neurology Center.
26 Respondent Sadeghi asked for a number of written prescriptions for controlled substances

27 _____
28 ⁴ The blue bin is the drug take-back receptacle as set forth in Article 9.1 of the California
Code of Regulations, title 16, sections 1776, et seq.

1 including methadone and multiple Fentanyl patches, which were declined. The veterinarian
2 denied that he or anyone at his office reauthorized the prescription for alprazolam after they
3 cancelled it, despite Respondent Sadeghi’s claim that he obtained reauthorization.

4 34. After reviewing all the records, the Board inspector determined that the first
5 prescription (RX #1366313) which was written by the veterinarian (paper prescription) on April
6 16, 2023, was for 120 tablets of alprazolam 1 mg with 3 additional refills with directions of “give
7 1 tablet orally up to every 6 hours as needed for anxiety.” However, Respondent Sadeghi entered
8 and verified the prescription with the following directions: “take 1 tablet orally every 4-6 hours as
9 needed for anxiety.” After verifying the prescription, Respondent Sadeghi sold that prescription
10 to himself on April 17, 2023. On or around May 4, 2023, that prescription was cancelled by the
11 veterinarian. Respondent Iskander inactivated the prescription in the computer on or around May
12 4, 2023 and noted, “spoke to Joel and Scott said to cancel any remaining refills.” On May 5,
13 2023, Respondent Sadeghi entered the following note in the computer under RX #1366313:
14 “Okay to fill.” On May 5, 2023, Respondent Sadeghi wrote and entered a “phone-in”
15 prescription (RX #1375138) for 120 tablets of alprazolam 1 mg with 3 refills, documenting that it
16 was authorized by “Devin” at the veterinarian’s office. Respondent Sadeghi picked up that
17 prescription the same day on May 5, 2023. Neither RX #1366313 nor 1375138 were reported to
18 CURES within one working day after the date the controlled substances were released.

19 **FIRST CAUSE FOR DISCIPLINE**

20 **(Unprofessional Conduct - Permitting a Pharmacy Technician to Initiate Vaccines)**

21 35. Respondent Pharmacy and Respondent Iskander are subject to disciplinary action
22 under Code section 4301, for unprofessional conduct and section 4301, subdivision (o) for
23 violation of the statutes regulating pharmacy, in that Respondents permitted pharmacy technicians
24 to act outside the scope of their permitted duties as set forth in Code section 4115, when they
25 allowed pharmacy technicians to independently initiate vaccinations for patients as set forth in
26 paragraphs 25 through 28, above.

27 ///

28 ///

1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Failing to Provide Oral Consultation to Patients)**

3 36. Respondent Pharmacy and Respondent Iskander are subject to disciplinary action
4 under Code section 4301, subdivision (o), for violating California Code of Regulations, title 16,
5 section 1707.2, in that Respondents failed to provide oral consultation to patients where the
6 patients received prescriptions drugs that had not previously been dispensed, as set forth in
7 paragraphs 25 through 28, above.

8 **THIRD CAUSE FOR DISCIPLINE**

9 **(Variation from Prescription)**

10 37. Respondent Sadeghi and Respondent Pharmacy are subject to disciplinary action
11 under Code section 4301, subdivision (o), for violation of California Code of California, title 16,
12 section 1716, in that Respondent Sadeghi dispensed a prescription with incorrect directions
13 thereby deviating from the requirements of the prescription, as set forth in paragraphs 29 through
14 34, incorporated herein.

15 **FOURTH CAUSE FOR DISCIPLINE**

16 **(Failing to Report Controlled Substance to the Department of Justice)**

17 38. Respondent Pharmacy and Respondent Iskander are subject to disciplinary action
18 under Code section 4301, subdivision (j) and/or (o), for violation of Health and Safety Code
19 section 11165, subdivision (d), in that Respondents dispensed controlled substance prescriptions
20 (RX 1366313 and 1375138) but failed to report those to CURES within one working day, as set
21 forth in paragraphs 29 through 34, incorporated herein.

22 **FIFTH CAUSE FOR DISCIPLINE**

23 **(Unauthorized Acceptance and Handling of Drugs - Prescription Drug Take-Back Services)**

24 39. Respondents are subject to disciplinary action under Code section 4301, subdivision
25 (j) and/or (o), for violation of California Code of Regulations, title 16, section 1776.1, subdivision
26 (g) for the unauthorized acceptance and handling of drugs from consumers that were intended to
27 be deposited into the prescription drug take-back receptacle, as set forth in paragraphs 29 through
28 34, incorporated herein.

1 **SIXTH CAUSE FOR DISCIPLINE**

2 **(Improper Management and Maintenance of Receptacle – Prescription Drug Take-Back**
3 **Services)**

4 40. Respondents are subject to disciplinary action under Code section 4301, subdivision
5 (j) and/or (o), for violation of California Code of Regulations, title 16, section 1776.3, as set forth
6 in paragraphs 29 through 34, incorporated herein, for the following:

7 a. The improper management and maintenance of the prescription drug take-back
8 receptacle in violation of California Code of Regulations, title 16, section 1776.3, subdivision (a).

9 b. Failing to direct consumers to directly deposit drugs into the prescription drug take-
10 back receptacle and instead accepting and/or handling the consumer’s drugs, in violation of
11 California Code of Regulations, title 16, section 1776.3, subdivision (e).

12 c. Removal of prescription drugs and/or individual handling of drugs after being
13 deposited into the prescription drug take-back receptacle, in violation of California Code of
14 Regulations, title 16, section 1776.3, subdivision (g).

15 **SEVENTH CAUSE FOR DISCIPLINE**

16 **(Illegal Possession of a Controlled Substance)**

17 41. Respondent Sadeghi is subject to disciplinary action under Code section 4301,
18 subdivision (j), for violation of statutes regulating controlled substances, in that Respondent
19 Sadeghi possessed a controlled substance without a prescription in violation of Business and
20 Professions Code section 4060 and Health and Safety Code section 11170, as set forth in
21 paragraphs 29 through 34, incorporated herein.

22 **EIGHTH CAUSE FOR DISCIPLINE**

23 **(Dishonesty or Moral Turpitude)**

24 42. Respondent Sadeghi is subject to disciplinary action under Code section 4301,
25 subdivision (f) for commission of acts involving moral turpitude or dishonesty, as set forth in
26 paragraphs 29 through 34, incorporated herein.

27 ///

28 ///

1 **NINTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct - Inappropriate Exercise of Education, Training and Experience)**

3 43. Respondent Sadeghi is subject to disciplinary action under Code section 4301 for
4 unprofessional conduct as defined by Business and Professions Code section 4306.5 in that
5 Respondent Sadeghi's acts involved, in whole or in part, the inappropriate exercise of his
6 education, training or experience as a pharmacist as set forth in paragraphs 29 through 34,
7 incorporated herein.

8 **OTHER MATTERS**

9 44. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit Number
10 PHY 49554, issued to Longs Drug Stores California, LLC, dba CVS/Pharmacy #3058, Longs
11 Drug Stores California, LLC, dba CVS/Pharmacy #3058 shall be prohibited from serving as a
12 manager, administrator, owner, member, officer, director, associate, or partner of a licensee for
13 five years if Pharmacy Permit Number PHY 49554, issued to Longs Drug Stores California, LLC,
14 dba CVS/Pharmacy #3058 is placed on probation or until reinstated if it is revoked.

15 45. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit Number
16 PHY 49554, issued to Longs Drug Stores California, LLC, dba CVS/Pharmacy #3058, while
17 Respondent Iskander was the Pharmacist-in-Charge, then Respondent Iskander shall be prohibited
18 from serving as a manager, administrator, owner, member, officer, director, associate, or partner
19 of a licensee for five years if Pharmacy Permit Number PHY 49554, issued to Longs Drug Stores
20 California, LLC, dba CVS/Pharmacy #3058 is placed on probation or until reinstated if it is
21 revoked.

22 46. Pursuant to Code section 4307, if discipline is imposed on Pharmacist License
23 Number RPH 84643, issued to Mario Raouf Iskander, Respondent Iskander shall be prohibited
24 from serving as a manager, administrator, owner, member, officer, director, associate, or partner
25 of a licensee for five years if Pharmacist License Number RPH 84643 is placed on probation or
26 until Pharmacist License Number RPH 84643 is reinstated if it is revoked.

27 47. Pursuant to Code section 4307, if discipline is imposed on Pharmacist License
28 Number RPH 85076, issued to Mayar Sadeghi, Respondent Sadeghi shall be prohibited from

1 serving as a manager, administrator, owner, member, officer, director, associate, or partner of a
2 licensee for five years if Pharmacist License Number RPH 85076 is placed on probation or until
3 Pharmacist License Number RPH 85076 is reinstated if it is revoked.

4 **DISCIPLINARY CONSIDERATIONS**

5 48. To determine the degree of discipline, if any, Complainant alleges the following
6 disciplinary considerations:

7 a. On or about January 3, 2018, the Board issued Citation No. CI 2017 76944 to
8 Respondent Pharmacy and ordered payment of a fine in the amount of \$2,500 for deviating from
9 the requirements of a prescription in violation of California Code of Regulations, title 16, section
10 1716, and for the unauthorized disclosure of prescription and medical information in violation of
11 California Code of Regulations, title 16, section 1764 and Civil Code section 56.10, subdivision
12 (a). The citation was paid and is now final.

13 b. On or about November 28, 2018, the Board issued Citation No. CI 2017 77073 to
14 Respondent Pharmacy for deviating from the requirements of a prescription in violation of
15 California Code of Regulations, title 16, section 1716. The citation is now final.

16 **PRAYER**

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

19 1. Revoking or suspending Pharmacy Permit Number PHY 49554, issued to Longs Drug
20 Stores California, LLC, dba CVS/Pharmacy #3058;

21 2. Revoking or suspending Pharmacist License Number RPH 84643, issued to Mario
22 Raouf Iskander;

23 3. Revoking or suspending Pharmacist License Number RPH 85076, issued to Mayar
24 Sadeghi;

25 4. Prohibiting Longs Drug Stores California, LLC, dba CVS/Pharmacy #3058 for
26 serving as a manager, administrator, owner, member, officer, director, associate, or partner of a
27 licensee for five years if Pharmacy Permit Number PHY 49554 is placed on probation or until
28

1 Pharmacy Permit Number PHY 49554 is reinstated if Pharmacy Permit Number PHY 49554
2 issued to Longs Drug Stores California, LLC, dba CVS/Pharmacy #3058 is revoked;

3 5. Prohibiting Mario Raouf Iskander from serving as a manager, administrator, owner,
4 member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit
5 Number PHY 49554 is placed on probation or until Pharmacy Permit Number PHY 49554 is
6 reinstated if Pharmacy Permit Number PHY 49554 issued to Longs Drug Stores California, LLC,
7 dba CVS/Pharmacy #3058 is revoked;

8 6. Prohibiting Mario Raouf Iskander from serving as a manager, administrator, owner,
9 member, officer, director, associate, or partner of a licensee for five years if Pharmacist License
10 Number RPH 84643 is placed on probation or until Pharmacist License Number RPH 84643 is
11 reinstated if Pharmacist License Number RPH 84643 issued to Mario Raouf Iskander is revoked;

12 7. Prohibiting Mayar Sadeghi from serving as a manager, administrator, owner,
13 member, officer, director, associate, or partner of a licensee for five years if Pharmacist License
14 Number RPH 85076 is placed on probation or until Pharmacist License Number RPH 85076 is
15 reinstated if Pharmacist License Number RPH 85076 issued to Maya Sadeghi is revoked;

16 8. Ordering Longs Drug Stores California, LLC, dba CVS/Pharmacy #3058, Mario
17 Raouf Iskander, and Mayar Sadeghi to pay the Board of Pharmacy the reasonable costs of the
18 investigation and enforcement of this case, pursuant to Business and Professions Code section
19 125.3; and,

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

21
22 DATED: 1/31/2024

Sodergren,
Anne@DCA

Digitally signed by Sodergren,
Anne@DCA
Date: 2024.01.31 15:58:31
-08'00'

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