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

12 In the Matter of the Accusation Against:

Case No. 7591

13 **COASTAL DRUGS LLC DBA COASTAL**  
14 **DRUGS; HEMA MANISH PATEL,**  
15 **ALPESH MANEKLAL PATEL**  
16 **3500 E. Broadway**  
17 **Long Beach, CA 90803**

18 **Permit No. PHY 55429,**

19 **and**

20 **AIKEN KIM BUI**  
21 **965 Blue Heron**  
22 **Seal Beach, CA 90740**

23 **Pharmacist License No. RPH 77581**

**DEFAULT DECISION AND ORDER AS**  
**TO COASTAL DRUGS LLC DBA**  
**COASTAL DRUGS; HEMA MANISH**  
**PATEL, ALPESH MANEKLAL PATEL**  
**ONLY**

[Gov. Code, §11520]

24 Respondents.

25 **FINDINGS OF FACT**

26 1. On or about December 13, 2024, Complainant Anne Sodergren, in her official  
27 capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs,  
28 filed Accusation No. 7591 against Coastal Drugs LLC dba Coastal Drugs; Hema Manish Patel,

1 Alpesh Maneklal Patel (Respondent) and Aiken Kim Bui before the Board of Pharmacy.  
2 (Accusation attached as Exhibit A.)

3 2. On or about January 25, 2017, the Board of Pharmacy issued Permit Number PHY  
4 55429 to Benzer Pharmacy Holding LLC, to do business as Benzer Pharmacy, with Hema Manish  
5 Patel as Chief Executive Officer and Alpesh Maneklal Patel as President. On or about June 12,  
6 2020, Benzer Pharmacy Holding LLC changed its business name to Coastal Drugs LLC dba  
7 Coastal Drugs (Respondent Coastal Drugs). Since January 25, 2017, Hema Manish Patel has  
8 served or been listed in Board records as Chief Executive Officer of Respondent Coastal Drugs  
9 and Alpesh Maneklal Patel has served or been listed in Board records as President of Respondent  
10 Coastal Drugs. According to the Board's records, Aiken Kim Bui is and has been the Pharmacist-  
11 in-Charge since March 11, 2022. However, Aiken Kim Bui was employed as the Pharmacist-in-  
12 Charge at Respondent Coastal Drugs' pharmacy from March 11, 2022 to January 19, 2023. The  
13 Permit was in full force and effect at all times relevant to the charges brought herein and will  
14 expire on January 1, 2024, unless renewed.

15 3. On or about December 22, 2023, Respondent was served by Certified and First Class  
16 Mail copies of the Accusation No. 7591, Statement to Respondent, Notice of Defense, Request  
17 for Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6, and  
18 11507.7) at Respondent's address of record which, pursuant to Business and Professions Code  
19 section 4100, is required to be reported and maintained with the Board. Respondent's address of  
20 record was and is: 3500 E. Broadway, Long Beach, CA 90803.

21 4. Service of the Accusation was effective as a matter of law under the provisions of  
22 Government Code section 11505(c) and/or Business and Professions Code section 124.

23 5. Government Code section 11506(c) states, in pertinent part:

24 (c) The respondent shall be entitled to a hearing on the merits if the respondent  
25 files a notice of defense . . . and the notice shall be deemed a specific denial of all  
26 parts of the accusation . . . not expressly admitted. Failure to file a notice of defense  
27 . . . shall constitute a waiver of respondent's right to a hearing, but the agency in its  
28 discretion may nevertheless grant a hearing.

6. The Board takes official notice of its records and the fact that Respondent failed to file a Notice of Defense within 15 days after service upon them of the Accusation, and therefore waived their right to a hearing on the merits of Accusation No. 7591.

7. California Government Code section 11520(a) states, in pertinent part:

(a) If the respondent either fails to file a notice of defense . . . or to appear at the hearing, the agency may take action based upon the respondent's express admissions or upon other evidence and affidavits may be used as evidence without any notice to respondent . . . .

8. Pursuant to its authority under Government Code section 11520, the Board finds Respondent is in default. The Board will take action without further hearing and, based on the relevant evidence contained in the Default Decision Investigatory Evidence Packet in this matter, finds that the charges and allegations in Accusation No. 7591, are separately and severally, found to be true and correct by clear and convincing evidence.

9. The Board finds that the actual costs for Investigation and Enforcement are \$4,648.75 as of March 5, 2024.

## DETERMINATION OF ISSUES

1. Based on the foregoing findings of fact, Respondent Coastal Drugs LLC dba Coastal Drugs; Hema Manish Patel, Alpesh Maneklal Patel has subjected its Permit No. PHY 55429 to discipline.

2. The agency has jurisdiction to adjudicate this case by default.

3. The Board of Pharmacy is authorized to revoke Respondent's Permit based upon the following violations alleged in the Accusation which are supported by the evidence contained in the Default Decision Investigatory Evidence Packet in this case:

a. Business and Professions Code sections 4301, subdivision (o), and 4113 in conjunction with California Code of Regulations, title 16, section 1714, subdivision (b), in that Respondent failed to maintain operational standards and security.

b. Business and Professions Code sections 4301, subdivision (o), and 4113 in conjunction with Code section 4081 and California Code of Regulations, title 16, section 1718, in that Respondent failed to account for controlled substances.

**ORDER**

IT IS SO ORDERED that Permit No. PHY 55429, issued to Respondent Coastal Drugs LLC dba Coastal Drugs; Hema Manish Patel, Alpesh Maneklal Patel, is revoked.

IT IS FURTHER ORDERED that Coastal Drugs, LLC is prohibited from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee until Pharmacy Permit No. PHY 55429 is reinstated.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

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

66629732.DOCX  
DOJ Matter ID:LA2023602278

By



Attachment:  
Exhibit A: Accusation

Seung W. Oh, Pharm. D.  
Board President

# Exhibit A

Accusation

(COASTAL DRUGS LLC DBA COASTAL DRUGS; HEMA MANISH PATEL, ALPESH MANEKLAL PATEL  
and AIKEN KIM BUI)

1 ROB BONTA  
Attorney General of California  
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8 **BEFORE THE**  
9 **BOARD OF PHARMACY**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 7591

13 **COASTAL DRUGS LLC DBA COASTAL**  
14 **DRUGS; HEMA MANISH PATEL,**  
15 **ALPESH MANEKLAL PATEL**  
16 **3500 E. Broadway**  
17 **Long Beach, CA 90803**

**ACCUSATION**

18 **Permit No. PHY 55429,**

19 and

20 **AIKEN KIM BUI**  
21 **965 Blue Heron**  
22 **Seal Beach, CA 90740**

23 **Pharmacist License No. RPH 77581**

24 Respondents.

25 **PARTIES**

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

28 2. On or about January 25, 2017, the Board of Pharmacy issued Permit Number PHY  
55429 to Benzer Pharmacy Holding LLC, to do business as Benzer Pharmacy, with Hema Manish  
Patel as Chief Executive Officer and Alpesh Maneklal Patel as President. On or about June 12,

2020, Benzer Pharmacy Holding LLC changed its business name to Coastal Drugs LLC dba Coastal Drugs (Respondent Coastal Drugs). Since January 25, 2017, Hema Manish Patel has served or been listed in Board records as Chief Executive Officer of Respondent Coastal Drugs and Alpesh Maneklal Patel has served or been listed in Board records as President of Respondent Coastal Drugs. According to the Board's records, Aiken Kim Bui is and has been the Pharmacist-in-Charge since March 11, 2022. However, Aiken Kim Bui was employed as the Pharmacist-in-Charge at Respondent Coastal Drugs' pharmacy from March 11, 2022 to January 19, 2023. The Permit was in full force and effect at all times relevant to the charges brought herein and will expire on January 1, 2024, unless renewed.

3. On or about October 10, 2017, the Board of Pharmacy issued Pharmacist License Number RPH 77581 to Aiken Kim Bui (Respondent Bui). The Pharmacist License was suspended by an Ex Parte Interim Suspension Order on January 17, 2023, which was extended on February 8, 2023. The Pharmacist License remains suspended. The Pharmacist License will expire on October 31, 2023, unless renewed. At all times relevant to the allegations and charges herein, Respondent Bui was the Pharmacist-in-Charge of Respondent Coastal Drugs.

### **JURISDICTION**

4. 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.

5. Code 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.).

6. 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.”

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

1 8. Code section 4300.1 states:

2 The expiration, cancellation, forfeiture, or suspension of a board-issued license  
3 by operation of law or by order or decision of the board or a court of law, the  
4 placement of a license on a retired status, or the voluntary surrender of a license by a  
5 licensee shall not deprive the board of jurisdiction to commence or proceed with any  
6 investigation of, or action or disciplinary proceeding against, the licensee or to render  
7 a decision suspending or revoking the license.

8 9. Code section 4307, subdivision (a) states:

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

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

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

## 23 **STATUTORY PROVISIONS**

24 10. Code section 4022 states, in pertinent part:

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

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

11. Code section 4081 states:

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



under Part 4 (commencing with Section 16000) of Division 9 of the Welfare and Institutions Code who maintains a stock of dangerous drugs or dangerous devices.

(b) The owner, officer, and partner of a pharmacy, wholesaler, third-party logistics provider, or veterinary food-animal drug retailer shall be jointly responsible, with the pharmacist-in-charge, responsible manager, or designated representative-in-charge, for maintaining the records and inventory described in this section.

(c) The pharmacist-in-charge, responsible manager, or designated representative-in-charge shall not be criminally responsible for acts of the owner, officer, partner, or employee that violate this section and of which the pharmacist-in-charge, responsible manager, or designated representative-in-charge had no knowledge, or in which he or she did not knowingly participate.

(d) Pharmacies that dispense nonprescription diabetes test devices pursuant to prescriptions shall retain records of acquisition and sale of those nonprescription diabetes test devices for at least three years from the date of making. The records shall be at all times during business hours open to inspection by authorized officers of the law.

12. 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:

...

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

### **REGULATORY PROVISIONS**

13. California Code of Regulations, title 16, section 1714, subdivision (b), states:

Each pharmacy licensed by the board shall maintain its facilities, space, fixtures, and equipment so that drugs are safely and properly prepared, maintained, secured and distributed. The pharmacy shall be of sufficient size and unobstructed area to accommodate the safe practice of pharmacy.

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

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

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

### **COST RECOVERY**

15. Code section 125.3 states, in pertinent part, that the Board may request the administrative law judge to direct a licentiate 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.

### **16. DRUG CLASSIFICATIONS**

Brand Name(s)	Generic Name	Dangerous Drug Per Bus. & Prof. Code § 4022	Scheduled Drug per Health & Safety Code (HSC)	Indications For Use
Percocet	oxycodone/acetaminophen (oxycodone/APAP)	Yes	Schedule II per HSC § 11055(b)(1)(M)	Pain
Phenergan with Codeine Syrup	promethazine/codeine syrup 10 mg-6.25mg/5ml	Yes	Schedule V per HSC § 11058(c)(1)	Cough Suppressant

### **FACTUAL ALLEGATIONS**

17. On or about February 21, 2023, the Board received a DEA Form 106<sup>1</sup> from Respondent Coastal Drugs, alleging that the former Pharmacist-in-Charge, Respondent Bui, diverted controlled substances. Respondent Bui served as the Pharmacist-in-Charge of Respondent Coastal Drugs from March 11, 2022 to January 19, 2023.

18. The Board's subsequent investigation and audit identified a violation of Pharmacy Law, in that Respondent Coastal Drugs could not account for an inventory shortage of two controlled substances, oxycodone/acetaminophen tablets and promethazine/codeine syrup.

<sup>1</sup> DEA Form 106 is used by persons or entities registered with or regulated by the United States Drug Enforcement Administration (DEA) to report theft or loss of controlled substances to the DEA, Diversion Control Division.

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Failure to Maintain Operational Standards and Security)**

3 19. Respondents Coastal Drugs and Bui are subject to disciplinary action under Code  
4 sections 4301, subdivision (o), and 4113, on the grounds of unprofessional conduct, for violating  
5 California Code of Regulations, title 16, section 1714, subdivision (b), in that they failed to secure  
6 the pharmacy to prevent loss of controlled substances. Specifically, for the audit periods,  
7 Respondent Coastal Drugs, while Respondent Bui was the Pharmacist-in-Charge, did not  
8 maintain security of controlled substances, as follows:

9 a. From June 7, 2022 to January 19, 2023, Respondent Coastal Drugs could not account  
10 for an inventory shortage of approximately 8,513 mL (approximately 18 pints) of  
11 promethazine/codeine 6.25 mg/10 mg per 5 mL syrup.

12 b. From September 7, 2022, to January 19, 2023, Respondent Coastal Drugs could not  
13 account for an inventory shortage of approximately 200 tablets of oxycodone/acetaminophen  
14 5mg/325 mg.

15 Complainant refers to, and by this reference incorporates, the allegations set forth above in  
16 paragraphs 17 and 18, as though set forth fully.

17 **SECOND CAUSE FOR DISCIPLINE**

18 **(Failure to Account for Controlled Substances)**

19 20. Respondents Coastal Drugs and Bui are subject to disciplinary action under Code  
20 sections 4301, subdivision (o), and 4113, on the grounds of unprofessional conduct, for violating  
21 Code section 4081 and California Code of Regulations, title 16, section 1718, by failing to  
22 maintain a "current inventory", in that Respondent Coastal Drugs, while Respondent Bui was the  
23 Pharmacist-in-Charge, was unable to account for approximately 8,513 mL (approximately 18  
24 pints) of promethazine/codeine 6.25 mg/10 mg per 5 mL syrup and approximately 200 tablets of  
25 oxycodone/acetaminophen 5mg/325 mg for the applicable audit periods. Complainant refers to,  
26 and by this reference incorporates, the allegations set forth above in paragraphs 17 through 19, as  
27 though set forth in full herein.

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**DISCIPLINE CONSIDERATIONS**

21. To determine the degree of discipline, if any, to be imposed on Respondent Coastal Drugs, Complainant alleges as follows:

a. On or about June 22, 2018, the Board issued Citation Number CI 2017 75922 based on violations of Code section 4301, subdivision (o), in conjunction with California Code of Regulations, title 16, section 1716 (variation from prescription). Citation Number CI 2017 75922 has been completed.

b. On or about July 28, 2020, the Board issued Citation Number CI 2018 81906 based on violations of Code section 4115, subdivision (e) (allowing unlicensed person to act as pharmacy technician). Citation Number CI 2018 81906 has been completed.

22. To determine the degree of discipline, if any, to be imposed on Respondent Bui, Complainant alleges the following:

a. On or about January 17, 2023, pursuant to Code section 494, the Board issued an Interim Suspension Order suspending Respondent Bui's Pharmacist License Number RPH 77581, for violating Code section 4306.5, subdivisions (a) (unprofessional conduct: inappropriate exercise of a pharmacist's education, training, or experience) and (b) (unprofessional conduct: failure to exercise best professional judgment), in the matter entitled *In the Matter of the Interim Suspension Order Against: Aiken Kim Bui*, Case No. CI 22 98265. The suspension was extended on February 8, 2023. The Pharmacist License remains suspended.

b. On or about August 29, 2023, Respondent Bui was convicted of one felony count of violating Penal Code section 30605, subdivision (a) [unlawful possession of an assault weapon, to wit: AK 47], in the criminal proceeding entitled *The People of the State of California v. Aiken Kim Bui* (Super. Ct. Los Angeles County, 2023, No. NA121309). The Court sentenced Respondent to two days in jail, placed him on two years of formal probation, prohibited him from owning or possessing a firearm, and ordered him to relinquish his firearms, cooperate with the probation officer in a plan for completion of mental counseling, and not to use or possess narcotics, dangerous or restricted drugs or associated paraphernalia, except with a valid prescription.

**OTHER MATTERS**

23. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit No. PHY 55429 issued to Respondent Coastal Drugs, Respondent Coastal Drugs shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 55429 is placed on probation or until Pharmacy Permit Number PHY 55429 is reinstated if it is revoked.

24. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit No. PHY 55429 issued to Respondent Coastal Drugs, while Hema Manish Patel has been an owner or manager and had knowledge of or knowingly participated in any conduct for which the licensee was disciplined, Hema Manish Patel shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 55429 is placed on probation or until Pharmacy Permit Number PHY 55429 is reinstated if it is revoked.

25. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit No. PHY 55429 issued to Respondent Coastal Drugs, while Alpesh Maneklal Patel has been an owner or manager and had knowledge of or knowingly participated in any conduct for which the licensee was disciplined, Alpesh Maneklal Patel shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 55429 is placed on probation or until Pharmacy Permit Number PHY 55429 is reinstated if it is revoked.

26. Pursuant to Code section 4307, if discipline is imposed on Pharmacist License No. RPH 77581 issued to Respondent Bui, Respondent Bui shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacist License Number RPH 77581 is placed on probation or until Pharmacist License Number RPH 77581 is reinstated if it is revoked.

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**PRAYER**

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

1. Revoking or suspending Permit Number PHY 55429, issued to Coastal Drugs LLC dba Coastal Drugs;

2. Revoking or suspending Pharmacist License Number RPH 77581, issued to Aiken Kim Bui;

3. Prohibiting Coastal Drugs LLC from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 55429 is placed on probation or until Pharmacy Permit Number PHY 55429 is reinstated if Pharmacy Permit Number PHY 55429 issued to Coastal Drugs LLC dba Coastal Drugs is revoked;

4. Prohibiting Hema Manish Patel from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 55429 is placed on probation or until Pharmacy Permit Number PHY 55429 is reinstated if Pharmacy Permit Number PHY 55429 issued to Coastal Drugs LLC dba Coastal Drugs is revoked;

5. Prohibiting Alpesh Maneklal Patel from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 55429 is placed on probation or until Pharmacy Permit Number PHY 55429 is reinstated if Pharmacy Permit Number 55429 issued to Coastal Drugs LLC dba Coastal Drugs is revoked;

6. Prohibiting Aiken Kim Bui from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 55429 is placed on probation or until Pharmacy Permit Number PHY 55429 is reinstated if Pharmacy Permit Number 55429 issued to Coastal Drugs LLC dba Coastal Drugs is revoked;

1           7.     Prohibiting Aiken Kim Bui from serving as a manager, administrator, owner,  
2 member, officer, director, associate, or partner of a licensee for five years if Pharmacist License  
3 Number RPH 77581 is placed on probation or until Pharmacist License Number RPH 77581 is  
4 reinstated, if it is revoked;

5           8.     Ordering Coastal Drugs LLC dba Coastal Drugs and Aiken Kim Bui to pay the Board  
6 of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to  
7 Business and Professions Code section 125.3; and,

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

10  
11       DATED: 12/13/2023

Sodergren,  
Anne@DCA

Digitally signed by  
Sodergren, Anne@DCA  
Date: 2023.12.13 20:52:54  
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ANNE SODERGREN  
Executive Officer  
Board of Pharmacy  
Department of Consumer Affairs  
State of California  
*Complainant*

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