

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

**In the Matter of the Accusation Against:**

**VLS CLAYWORTH PHARMACY, INC., DBA CLAYWORTH  
HEALTHCARE PHARMACY;  
SUMEET GORE, TREASURER/CHIEF FINANCIAL OFFICER;  
RAJASHEKAR N. SANNIDHI, SECRETARY**

**Pharmacy Permit No. PHY 51452,**

**and**

**SUDHIR V. REDDY,**

**Pharmacist License No. RPH 59795,**

**Respondents.**

**Agency Case No. 7729**

**OAH No. 2024110215**

## DECISION AND ORDER


The attached Stipulated Settlement and Disciplinary Order for Public Repeval 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 13, 2025.

It is so ORDERED on July 14, 2025.

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 initial "S" and "O".

Seung W. Oh, Pharm.D.  
Board President

1 ROB BONTA  
Attorney General of California  
2 CHAR SACHSON  
Supervising Deputy Attorney General  
3 HOWARD SKEBE  
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7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

13 **VLS CLAYWORTH PHARMACY, INC.,**  
14 **DBA CLAYWORTH HEALTHCARE**  
15 **PHARMACY; SUMEET GORE,**  
16 **TREASURER/CHIEF FINANCIAL**  
17 **OFFICER; RAJASHEKAR N. SANNIDHI,**  
18 **SECRETARY**  
19 **20353 Lake Chabot Blvd., Suite 101**  
20 **Castro Valley, CA 94611**

21 **Pharmacy License No. PHY 51452**

22 **and**

23 **SUDHIR V. REDDY**  
24 **20353 Lake Chabot Blvd., Suite 101**  
25 **Castro Valley, CA 94611**

26 **Registered Pharmacist No. RPH 59795**

27 Respondents.

Case No. 7729

OAH No. 2024110215

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER FOR PUBLIC  
REPROVAL FOR RESPONDENT VLS  
CLAYWORTH PHARMACY, INC.**

**[Bus. & Prof. Code § 495]**

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

**PARTIES**

1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy  
(Board). She brought this action solely in her official capacity and is represented in this matter by

1 Rob Bonta, Attorney General of the State of California, by Howard Skebe, Deputy Attorney  
2 General.

3 2. Respondent VLS Clayworth Pharmacy, Inc., doing business as Clayworth Healthcare  
4 Pharmacy (Respondent Pharmacy) is represented in this proceeding by attorney Natalia Mazina,  
5 whose address is: 100 Pine St. #1250, San Francisco, CA 94111.

6 3. On or about June 19, 2013, the Board issued Pharmacy License No. PHY 51452 to  
7 Respondent Pharmacy. The Pharmacy License was in full force and effect at all times relevant to  
8 the charges brought in Accusation No. 7729 and will expire on June 1, 2025, unless renewed.

9 4. On or about July 13, 2007, the Board issued Registered Pharmacist No. RPH 59795  
10 to Sudhir V. Reddy (Respondent Reddy). The Registered Pharmacist License was in full force  
11 and effect at all times relevant to the charges brought in Accusation No. 7729, and will expire on  
12 October 31, 2026, unless renewed. At all times relevant to the charges brought herein,  
13 Respondent Reddy was the Pharmacist-In-Charge (PIC) for Respondent Pharmacy.

#### 14 **JURISDICTION**

15 5. Accusation No. 7729 was filed before the Board on or about June 12, 2024, and is  
16 currently pending against Respondent Pharmacy. The Accusation and all other statutorily  
17 required documents were properly served on Respondent Pharmacy on June 13, 2024.  
18 Respondent Pharmacy timely filed its Notice of Defense contesting the Accusation. A copy of  
19 Accusation No. 7729 is attached as Exhibit A and incorporated herein by reference.

#### 20 **ADVISEMENT AND WAIVERS**

21 6. Respondent Pharmacy has carefully read, fully discussed with counsel, and  
22 understands the charges and allegations in Accusation No. 7729. Respondent Pharmacy has also  
23 carefully read, fully discussed with counsel, and understands the effects of this Stipulated  
24 Settlement and Disciplinary Order for Public Repeval.

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

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

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

5 **CULPABILITY**

6 9. Respondent Pharmacy admits the truth of each and every charge and allegation in  
7 Accusation No. 7729.

8 10. Respondent Pharmacy agrees that its Pharmacy License is subject to discipline and  
9 agrees to be bound by the Disciplinary Order below.

10 **CONTINGENCY**

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

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

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

1 supplemented, or otherwise changed except by a writing executed by an authorized representative  
2 of each of the parties.

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

6 **DISCIPLINARY ORDER**

7 IT IS HEREBY ORDERED that Pharmacy License No. PHY 51452 issued to Respondent  
8 VLS Clayworth Pharmacy, Inc., dba Clayworth Healthcare Pharmacy, shall be publicly reprovved  
9 by the Board of Pharmacy under Business and Professions Code section 495 in resolution of  
10 Accusation No. 7729, attached as Exhibit A.

11 **Cost Recovery.** Respondents VLS Pharmacy and Reddy shall pay to the Board its costs of  
12 investigation and prosecution in the total amount of \$17,500.00. Respondent VLS Pharmacy is  
13 jointly and severally liable for these costs with Respondent Reddy. Respondent VLS Pharmacy  
14 shall be permitted to pay these costs in a payment plan approved by the Board or its designee, so  
15 long as full payment is completed no later than one (1) year prior to the end date of Respondent  
16 Reddy's probation. If Respondents fail to pay the Board costs as ordered, Respondent VLS  
17 Pharmacy shall not be allowed to renew its Pharmacy License until Respondents pay costs in  
18 full. The Board may enforce this order for payment of its costs against Respondent VLS  
19 Pharmacy in any appropriate court.

20 **Full Compliance.** As a resolution of the charges in Accusation No. 7729, this stipulated  
21 settlement is contingent upon Respondent Pharmacy's full compliance with all conditions of this  
22 Order. If Respondent Pharmacy fails to satisfy any of these conditions, such failure to comply  
23 constitutes cause for discipline, including outright revocation, of Respondent Pharmacy's  
24 Pharmacy License No. PHY 51452.

25 **ACCEPTANCE**

26 I am authorized to sign for and bind Respondent Pharmacy, have carefully read the above  
27 Stipulated Settlement and Disciplinary Order for Public Reapproval, and have fully discussed it  
28 with my attorney, Natalia Mazina. I understand the stipulation and the effect it will have on

1 Pharmacy License No. PHY 51452. I enter into this Stipulated Settlement and Disciplinary Order  
2 for Public Repeval voluntarily, knowingly, and intelligently, and agree to be bound by the  
3 Decision and Order of the Board of Pharmacy.

4  
5 DATED: \_\_\_\_\_  
6 Sudhir V. Reddy, Pharmacist In-Charge  
7 VLS CLAYWORTH PHARMACY, INC., DBA  
8 CLAYWORTH HEALTHCARE PHARMACY  
9 Respondent VLS Clayworth Pharmacy

10 I have read and fully discussed with my client, Respondent VLS Clayworth Pharmacy, Inc.,  
11 dba Clayworth Healthcare Pharmacy, the terms and conditions and other matters contained in the  
12 above Stipulated Settlement and Disciplinary Order for Public Repeval. I approve its form and  
13 content.

14 DATED: \_\_\_\_\_  
15 NATALIA MAZINA  
16 Attorney for Respondent VLS Clayworth  
17 Pharmacy, Inc. dba Clayworth Healthcare  
18 Pharmacy

19 **ENDORSEMENT**

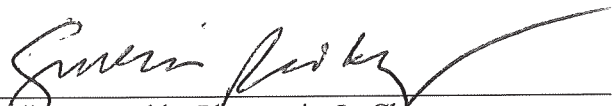
20 The foregoing Stipulated Settlement and Disciplinary Order for Public Repeval is hereby  
21 respectfully submitted for consideration by the Board of Pharmacy, of the Department of  
22 Consumer Affairs.

23 DATED: \_\_\_\_\_ Respectfully submitted,  
24 ROB BONTA  
25 Attorney General of California  
26 CHAR SACHSON  
27 Supervising Deputy Attorney General


28 HOWARD SKEBE  
Deputy Attorney General  
Attorneys for Complainant

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1 Pharmacy License No. PHY 51452. I enter into this Stipulated Settlement and Disciplinary Order  
2 for Public Reproval voluntarily, knowingly, and intelligently, and agree to be bound by the  
3 Decision and Order of the Board of Pharmacy.

4  
5 DATED: 5/21/25   
6 Sudhir V. Reddy, Pharmacist In-Charge  
7 VLS CLAYWORTH PHARMACY, INC., DBA  
8 CLAYWORTH HEALTHCARE PHARMACY  
9 Respondent VLS Clayworth Pharmacy

10 I have read and fully discussed with my client, Respondent VLS Clayworth Pharmacy, Inc.,  
11 dba Clayworth Healthcare Pharmacy, the terms and conditions and other matters contained in the  
12 above Stipulated Settlement and Disciplinary Order for Public Reproval. I approve its form and  
13 content.

14 DATED: May 21, 2025   
15 NATALIA MAZINA  
16 Attorney for Respondent VLS Clayworth  
17 Pharmacy, Inc. dba Clayworth Healthcare  
18 Pharmacy

19 **ENDORSEMENT**

20 The foregoing Stipulated Settlement and Disciplinary Order for Public Reproval is hereby  
21 respectfully submitted for consideration by the Board of Pharmacy, of the Department of  
22 Consumer Affairs.

23 DATED: May 23, 2025 Respectfully submitted,  
24 ROB BONTA  
25 Attorney General of California  
26 CHAR SACHSON  
27 Supervising Deputy Attorney General  
28 /s/ Howard Skebe  
HOWARD SKEBE  
Deputy Attorney General  
Attorneys for Complainant

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**Exhibit A**

**Accusation No. 7729**

1 ROB BONTA  
Attorney General of California  
2 JOSHUA A. ROOM  
Supervising Deputy Attorney General  
3 CHRISTOPHER M. YOUNG  
Deputy Attorney General  
4 State Bar No. 238532  
455 Golden Gate Avenue, Suite 11000  
5 San Francisco, CA 94102-7004  
Telephone: (415) 510-3554  
6 Facsimile: (415) 703-5480  
*Attorneys for Complainant*  
7

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. 7729

13 **VLS CLAYWORTH PHARMACY, INC., DBA**  
14 **CLAYWORTH HEALTHCARE PHARMACY;**  
15 **SUMEET GORE, TREASURER/CHIEF**  
16 **FINANCIAL OFFICER; RAJASHEKAR N.**  
17 **SANNIDHI, SECRETARY**  
18 **20353 Lake Chabot Blvd., Suite 101**  
19 **Castro Valley, CA 94611**

**ACCUSATION**

20 **Pharmacy License No. PHY 51452**

21 **and**

22 **SUDHIR V. REDDY**  
23 **20353 Lake Chabot Blvd., Suite 101**  
24 **Castro Valley, CA 94611**

25 **Pharmacist License No. RPH 59795**

26 Respondents.

27 **PARTIES**

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

2. On or about June 19, 2013, the Board of Pharmacy issued Pharmacy License Number  
PHY 51452 to VLS Clayworth Pharmacy, Inc. dba Clayworth Healthcare Pharmacy (Respondent

1 Pharmacy). The Pharmacy License was in full force and effect at all times relevant to the charges  
2 brought herein and will expire on June 1, 2024, unless renewed.

3 3. On or about July 13, 2007, the Board of Pharmacy issued Pharmacist License  
4 Number RPH 59795 Sudhir V. Reddy (Respondent Reddy). The Registered Pharmacist License  
5 was in full force and effect at all times relevant to the charges brought herein and will expire on  
6 October 31, 2024, unless renewed. At all times relevant to the charges brought herein,  
7 Respondent Reddy was the Pharmacist-In-Charge (PIC) for Respondent Pharmacy.

### 8 JURISDICTION

9 4. This Accusation is brought before the Board of Pharmacy (Board), Department of  
10 Consumer Affairs, under the authority of the following laws. All section references are to the  
11 Business and Professions Code (Code) unless otherwise indicated.

12 5. Code section 4011 provides that the Board shall administer and enforce the Pharmacy  
13 Law [Bus. & Prof. Code, § 4000 et seq.]. Further pursuant to Code section 4011, the Board also  
14 administers and enforces the Uniform Controlled Substances Act.

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

17 7. Code section 4300.1 provides that the expiration, cancellation, forfeiture, suspension,  
18 or voluntary surrender of a license “shall not deprive the board of jurisdiction to commence or  
19 proceed with any investigation of, or action or disciplinary proceeding against, the licensee or to  
20 render a decision suspending or revoking the license.”

21 8. Code section 4307 states:

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

1 (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  
2 five years.

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

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

7 (c) The provisions of subdivision (a) may be alleged in any pleading filed  
pursuant to Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of  
8 the Government Code. However, no order may be issued in that case except as to a  
person who is named in the caption, as to whom the pleading alleges the applicability  
9 of this section, and where the person has been given notice of the proceeding as  
required by Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of  
10 the Government Code. The authority to proceed as provided by this subdivision shall  
be in addition to the board's authority to proceed under Section 4339 or any other  
11 provision of law.

## 12 STATUTORY PROVISIONS

13 9. Code section 4071 states:

14 Notwithstanding any other provision of law, a prescriber may authorize his or  
her agent on his or her behalf to orally or electronically transmit a prescription to the  
15 furnisher. The furnisher shall make a reasonable effort to determine that the person  
who transmits the prescription is authorized to do so and shall record the name of the  
16 authorized agent of the prescriber who transmits the order.

17 This section shall not apply to orders for Schedule II controlled substances.

18 10. Code section 4072 states, in pertinent part:

19 (a) Notwithstanding any other provision of law, a pharmacist, registered nurse,  
20 licensed vocational nurse, licensed psychiatric technician, or other healing arts  
licentiate, if so authorized by administrative regulation, who is employed by or serves  
as a consultant for a licensed skilled nursing, intermediate care, or other health care  
21 facility, may orally or electronically transmit to the furnisher a prescription lawfully  
ordered by a person authorized to prescribe drugs or devices pursuant to Sections  
22 4040 and 4070. The furnisher shall take appropriate steps to determine that the person  
who transmits the prescription is authorized to do so and shall record the name of the  
23 person who transmits the order. This section shall not apply to orders for Schedule II  
controlled substances.

24 ...

25  
26 11. Code section 4301 states, in pertinent part:

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

...

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

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

12. Health and Safety Code section 11167 states, in pertinent part:

Notwithstanding subdivision (a) of Section 11164, in an emergency where failure to issue a prescription may result in loss of life or intense suffering, an order for a controlled substance may be dispensed on an oral order, an electronic data transmission order, or a written order not made on a controlled substance form as specified in Section 11162.1, subject to all of the following requirements:

(a) The order contains all information required by subdivision (a) of Section 11164.

(b) Any written order is signed and dated by the prescriber in ink, and the pharmacy reduces any oral or electronic data transmission order to hard copy form prior to dispensing the controlled substance.

(c) The prescriber provides a written prescription on a controlled substance prescription form that meets the requirements of Section 11162.1, by the seventh day following the transmission of the initial order; a postmark by the seventh day following transmission of the initial order shall constitute compliance.

(d) If the prescriber fails to comply with subdivision (c), the pharmacy shall so notify the Department of Justice in writing within 144 hours of the prescriber's failure to do so and shall make and retain a hard copy, readily retrievable record of the prescription, including the date and method of notification of the Department of Justice. . . .

13. Civil Code section 56.10 states, in pertinent part:

(a) A provider of health care, health care service plan, or contractor shall not disclose medical information regarding a patient of the provider of health care or an enrollee or subscriber of a health care service plan without first obtaining an authorization, except as provided in subdivision (b) or (c). . . .

**REGULATORY PROVISIONS**

14. California Code of Regulations, title 16, section 1707.2, states, in pertinent part:

...

(b) (1) When the patient or patient's agent is not present (including, but not limited to, a prescription drug that was shipped by mail or delivery), a pharmacy shall ensure that:

(A) the patient receives written notice of his or her right to request consultation;

1 (B) the patient receives written notice of the hours of availability and the  
2 telephone number from which the patient may obtain oral consultation from a  
3 pharmacist who has ready access to the patient's record . . . .

4 15. California Code of Regulations, title 16, section 1714, states, in pertinent part:

5 . . .

6 (c) The pharmacy and fixtures and equipment shall be maintained in a clean and  
7 orderly condition. The pharmacy shall be dry, well-ventilated, free from rodents and  
8 insects, and properly lighted. . . .

9 16. California Code of Regulations, title 16, section 1715.65, states, in pertinent part:

10 (a) Every pharmacy, and every clinic licensed under sections 4180 or 4190 of  
11 the Business and Professions Code, shall perform periodic inventory activities and  
12 prepare inventory reconciliation reports to detect and prevent the loss of federal  
13 controlled substances. Except as provided in subdivisions (f) and (g), inventory  
14 reconciliation reports shall be prepared on the following ongoing basis:

15 (1) For federal Schedule II controlled substances, at least once every three  
16 months.

17 (2) For products containing the following substances in the following strengths  
18 per tablet, capsule, other unit, or specified volume, at least once every 12 months:

19 (A) Alprazolam, 1 milligram/unit.

20 (B) Alprazolam, 2 milligrams/unit.

21 (C) Tramadol, 50 milligrams/unit.

22 (D) Promethazine/codeine, 6.25 milligrams of promethazine and 10 milligrams  
23 of codeine per 5 milliliters of product.

24 (3)

25 (A) For any controlled substance not covered by paragraph (1) or (2), an  
26 inventory reconciliation report shall be prepared for identified controlled substances  
27 lost no later than three months after discovery of the reportable loss of that controlled  
28 substance. This report shall be completed if the loss is discovered either by the  
inventory activities required by subparagraph (B), or in any other manner. The report  
shall cover the period from the last physical count of that controlled substance before  
the loss was discovered through the date of discovery. At a minimum, a reportable  
loss is as specified in section 1715.6, or any pattern(s) of loss(es) identified by the  
pharmacist in charge, as defined by the pharmacy's policies and procedures. A  
reportable loss shall require an inventory reconciliation report for each pattern of loss  
identified.

(B) Inventory activities for each controlled substance not covered by paragraph  
(1) or (2) shall be performed at least once every two years from the performance of  
the last inventory activities. For purposes of this section, "inventory activities" means  
inventory and all other functions sufficient to identify loss of controlled substances.

1 The functions sufficient to identify loss outside of the inventory reconciliation  
2 process shall be identified within the pharmacy's policies and procedures.

3 . . .

4 (c) An inventory reconciliation report prepared pursuant to this section shall  
5 include all of the following:

6 (1) A physical count, not an estimate, of all quantities of each federal controlled  
7 substance covered by the report that the pharmacy or clinic has in inventory, except  
8 as provided in subdivision (h). The biennial inventory of controlled substances  
9 required by federal law may serve as one of the mandated inventories under this  
10 section in the year where the federal biennial inventory is performed, provided the  
11 biennial inventory was taken no more than three months from the last inventory  
12 required by this section. An individual who performs the inventory required by this  
13 paragraph shall sign and date the inventory or the report in which it is included as  
14 provided in subdivision (e)(1);

15 (2) A review of all acquisitions and dispositions of each federal controlled  
16 substance covered by the report since the last inventory reconciliation report covering  
17 that controlled substance;

18 (3) A comparison of (1) and (2) to determine if there are any variances;

19 (4) Identification of all records used to compile the report, which shall be  
20 maintained in the pharmacy or clinic pursuant to subdivision (e)(2);

21 (5) Identification of each individual involved in preparing the report; and

22 (6) Possible causes of overages.

23 . . .

24 (e)

25 (1) An inventory reconciliation report shall be dated and signed by the  
26 pharmacist-in-charge or professional director (if a clinic), in addition to any signature  
27 required by subdivision (c)(1). An individual may use a digital or electronic signature  
28 or biometric identifier in lieu of a physical signature under this section if, in addition,  
the individual physically signs a printed statement confirming the accuracy of the  
inventory or report. The signature shall be dated, and the signed and dated statement  
shall be retained on file pursuant to paragraph (2).

(2) The report, and all records used to compile the report, shall be readily  
retrievable in the pharmacy or clinic for three years. . . .

17. California Code of Regulations, title 16, section 1735.2, subdivision (e) states, in  
pertinent part:

(e) A drug preparation shall not be compounded until the pharmacy has first  
prepared a written master formula document that includes at least the following  
elements:

...

(4) Inactive ingredients to be used. . . .

18. California Code of Regulations, title 16, section 1735.3, states, in pertinent part:

(a) For each compounded drug preparation, pharmacy records shall include:

(1) The master formula document.

(2) A compounding log consisting of a single document containing all of the following:

...

(E) The quantity of each ingredient used in compounding the drug preparation.

(F) The manufacturer, expiration date and lot number of each component. If the manufacturer name is demonstrably unavailable, the name of the supplier may be substituted. If the manufacturer does not supply an expiration date for any component, the records shall include the date of receipt of the component in the pharmacy, and the limitations of section 1735.2, subdivision ( l ) shall apply. . . .

(J) Documentation of quality reviews and required post-compounding process and procedures. . . .

19. California Code of Regulations, title 16, section 1735.8, states, in pertinent part:

...

(c) The quality assurance plan shall include written standards for qualitative and quantitative analysis of compounded drug preparations to ensure integrity, potency, quality, and labeled strength, including the frequency of testing. All qualitative and quantitative analysis reports for compounded drug preparations shall be retained by the pharmacy and maintained along with the compounding log and master formula document. The quality assurance plan shall include a schedule for routine testing and analysis of specified compounded drug preparations to ensure integrity, potency, quality, and labeled strength, on at least an annual basis. . . .

20. California Code of Regulations, title 16, section 1764, states:

No pharmacist shall exhibit, discuss, or reveal the contents of any prescription, the therapeutic effect thereof, the nature, extent, or degree of illness suffered by any patient or any medical information furnished by the prescriber with any person other than the patient or his or her authorized representative, the prescriber or other licensed practitioner then caring for the patient, another licensed pharmacist serving the patient, or a person duly authorized by law to receive such information.

1 21. 21 C.F.R. § 1306.11, subdivision (d) states, in pertinent part:

2 . . .

3 (d) In the case of an emergency situation, as defined by the Secretary in §  
4 290.10 of this title, a pharmacist may dispense a controlled substance listed in  
5 Schedule II upon receiving oral authorization of a prescribing individual practitioner,  
6 provided that:

7 (1) The quantity prescribed and dispensed is limited to the amount adequate to  
8 treat the patient during the emergency period (dispensing beyond the emergency  
9 period must be pursuant to a paper or electronic prescription signed by the prescribing  
10 individual practitioner);

11 (2) The prescription shall be immediately reduced to writing by the pharmacist  
12 and shall contain all information required in § 1306.05, except for the signature of the  
13 prescribing individual practitioner;

14 (3) If the prescribing individual practitioner is not known to the pharmacist, he  
15 must make a reasonable effort to determine that the oral authorization came from a  
16 registered individual practitioner, which may include a callback to the prescribing  
17 individual practitioner using his phone number as listed in the telephone directory  
18 and/or other good faith efforts to insure his identity; and

19 (4) Within 7 days after authorizing an emergency oral prescription, the  
20 prescribing individual practitioner shall cause a written prescription for the  
21 emergency quantity prescribed to be delivered to the dispensing pharmacist. In  
22 addition to conforming to the requirements of § 1306.05, the prescription shall have  
23 written on its face "Authorization for Emergency Dispensing," and the date of the  
24 oral order. The paper prescription may be delivered to the pharmacist in person or by  
25 mail, but if delivered by mail it must be postmarked within the 7-day period. Upon  
26 receipt, the dispensing pharmacist must attach this paper prescription to the oral  
27 emergency prescription that had earlier been reduced to writing. For electronic  
28 prescriptions, the pharmacist must annotate the record of the electronic prescription  
with the original authorization and date of the oral order. The pharmacist must notify  
the nearest office of the Administration if the prescribing individual practitioner fails  
to deliver a written prescription to him; failure of the pharmacist to do so shall void  
the authority conferred by this paragraph to dispense without a written prescription of  
a prescribing individual practitioner. . . .

21  
22 **COST RECOVERY**

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

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1 **FACTUAL ALLEGATIONS**

2 **Pharmacy Cleanliness**

3 23. During a routine inspection at Respondent Pharmacy, conducted on January 23, 2023  
4 and January 30, 2023, a Board Inspector issued written notices of non-compliance for various  
5 violations of pharmacy law. During the initial inspection on January 23, 2023, two pet dogs were  
6 observed inside the pharmacy, with dog crates and dog beds, food bowls, pet toys, all located in  
7 the data processing part of Respondent Pharmacy. The Board Inspector notified a staff  
8 pharmacist at Respondent Pharmacy that having pets on the premises was not in compliance with  
9 the Pharmacy Law. At that point one of the dogs was moved to a staff member’s car, and the  
10 other dog was moved to a room in the back of Respondent Pharmacy next to the non-sterile  
11 compounding room.

12 **Notice of Right to Consultation with Pharmacist**

13 24. Respondent Pharmacy is a closed-door pharmacy, and conducts nearly all business  
14 through delivery of medications. The Board Inspector observed on January 23 and 30, 2023, that  
15 numerous prescription delivery bags did not have the required notice to the consumer relating to  
16 the right to consultation relating to the prescription. Respondent Pharmacy had previously been  
17 issued an Order of Correction in August 2018 relating to the failure to provide notice of the right  
18 to request oral consultation relating to prescriptions. During the January 23 and 30, 2023  
19 inspection, some bags prepared for delivery were “stamped” with the notice, while the majority  
20 did not have the notice stamped on the bags. Respondent Reddy indicated that the consultation  
21 notice stamp was available, but that staff may have forgotten to include the notice on the  
22 deliveries prepared by staff and observed by the Board Inspector.

23 **Requirement to Complete Controlled Substance Reconciliation Report**

24 25. Respondent Reddy was asked for the controlled substances “reconciliation report”  
25 required to be prepared pursuant to California Code of Regulations, title 16, section 1715.65,  
26 during the inspection on January 23, 2023. Respondent Reddy indicated that no report had been  
27 prepared. During the previous August 2018 inspection, the Board Inspector notified Respondent  
28 Reddy of the audit chart to be used to prepare the reconciliation report for controlled substances.

1                    **Procedures Relating to Emergency Dispensing of Controlled Substances**

2                    26. Respondent Pharmacy, at times, dispensed controlled substances to patients on an  
3 emergency basis. During inspection, the Board Inspector noticed stacks of prescription  
4 documents for Schedule II controlled substances that had either been called in or faxed to  
5 Respondent Pharmacy, dating from as early as 2018 through the date of the inspection in 2023.  
6 The Board Inspector collected a sample of 57 separate oral/faxed prescriptions for Schedule II  
7 controlled substances filled under emergency dispensing, with date ranges between October 2020  
8 through January 2022. Within seven days of an oral/faxed prescription for controlled substances,  
9 a written prescription must be provided to the pharmacy. The Board Inspector requested the  
10 written prescriptions for the 57 oral/faxed prescriptions that Respondent Pharmacy had filled.  
11 Respondent Reddy could not locate any written prescriptions for the 57 identified oral/faxed  
12 prescriptions.

13                    27. When asked to explain Respondent Pharmacy’s process when filling oral/faxed  
14 emergency prescriptions, Respondent Reddy explained that after receiving the prescription,  
15 Respondent Pharmacy would fill and deliver the prescription to the requestor. Upon delivery, a  
16 signature was obtained from the person receiving the medication. If an order came in orally,  
17 Respondent Pharmacy would fax the prescriber for a signature. Respondent Reddy indicated that  
18 Respondent Pharmacy did follow up with the prescriber to obtain a written prescription, but no  
19 process appeared to be in place, and no written prescriptions were located for the 57 identified  
20 oral/faxed emergency prescriptions.

21                    28. If a written prescription is not obtained within seven days of an emergency oral/faxed  
22 prescription for controlled substances, Respondent Pharmacy was required to notify the Bureau of  
23 Narcotic Enforcement within 144 hours of the prescriber’s failure to provide a written  
24 prescription. Respondent Reddy indicated he was unaware of the required report to the Bureau of  
25 Narcotic Enforcement, and indicated further that he had never made such a report to the Bureau  
26 of Narcotic Enforcement, where such reports are required under Health and Safety Code section  
27 11167 and/or 21 C.F.R. § 1306.11, subdivision (d).

28

1           29. Additionally, all of the 57 identified oral/faxed emergency prescriptions had been  
2 called in or faxed by a nurse or an authorized agent of the prescriber. A prescriber's agent,  
3 registered nurse, or licensed vocational nurse may not orally or electronically transmit a Schedule  
4 II controlled substance prescription to a pharmacy under pharmacy law. Respondent Reddy  
5 stated he was not aware of the legal requirement under Bus. & Prof. Code, § 4071, regarding the  
6 transmissions of prescriptions by agents of the prescriber.

7           **Non-Sterile Compounding by Respondent Pharmacy**

8           30. During the inspection on January 30, 2023, compounding drug prescription labels,  
9 compounding records, and master formula documents were reviewed by Board Inspectors in  
10 relation to Respondent Pharmacy's non-sterile compounding processes and procedures. The  
11 following issues were identified as violations of pharmacy law:

- 12           • **Prescription # RX6465961** had been compounded on or about January 27, 2023,  
13           three days prior to the inspection. The compounding record for the prescription  
14           recorded expired ingredients, and the actual ingredients used in the compounding  
15           were not reflected on the compounding record. Additionally, the master formula for  
16           the compounded drug was not followed.
- 17           • **Prescription # RX4549266** had been compounded on or about January 25, 2023,  
18           five days prior to the inspection. The compounding record for the prescription  
19           recorded expired ingredients, and the actual ingredients used in the compounding  
20           were not reflected on the compounding record. Additionally, the master formula for  
21           the compounded drug was not followed, and the compounding pharmacist used a  
22           substituted drug not listed in the compounding record.
- 23           • **Prescription # RX 6452124** had been compounded on January 26, 2023, four days  
24           prior to the inspection. The compounding record did not have quality reviews  
25           listed, and did not have the required post-compounding process and procedures  
26           documented.

1           31.     During a previous inspection of Respondent Pharmacy on August 20, 2018, an  
2 Order of Correction had been issued to Respondent Pharmacy for failing to document quality  
3 reviews and required post-compounding processes and procedures.

4           32.     Respondent Pharmacy produced its most recent routine testing and analysis of a  
5 compounded drug preparation, which was completed on or about October 7, 2020, over two years  
6 prior to the January 30, 2023 inspection. During the August 20, 2018 inspection, an Order of  
7 Correction had been issued to Respondent Pharmacy for failing to perform routine testing and  
8 analysis of specified compounded drug preparations to ensure potency, quality, and labeled  
9 strength, which must be performed on an annual basis. Despite the 2018 Order of Correction,  
10 these routine analyses had not been conducted at Respondent Pharmacy for any compounded drug  
11 preparations in over two years.

12           **Respondent Pharmacy Self-Assessment**

13           33.     The most recent pharmacy self-assessment completed by Respondent Pharmacy was  
14 dated June 30, 2021. Respondent Reddy noted “yes” to several items at Respondent Pharmacy  
15 that were found not in compliance during the January 2023 inspections, including:

- 16           • Pharmacy premises, fixtures, and equipment maintained in clean and orderly  
17 condition, properly lighted and free from rodents and insects;
- 18           • If prescription medication is mailed or delivered, written notice about the  
19 availability of consultation is provided;
- 20           • If prescription is orally or electronically transmitted by prescriber’s agent, the  
21 pharmacist makes a reasonable attempt to verify that the prescriber’s agent is  
22 authorized to do so, and the agent’s name is recorded;
- 23           • When dispensed upon an oral order on an emergency basis, a Schedule II  
24 [controlled substance] prescription is provided by the prescriber by the seventh  
25 day following the transmission of the oral order. If not received, the pharmacy  
26 reports failure to provide prescription document to the California Bureau of  
27 Narcotic Enforcement within 144 hours of the failure to provide prescription;
- 28

- A faxed prescription for Schedule II controlled substance is dispensed after the original written prescription is received from the prescriber;
- The pharmacist, in a true emergency, dispenses a Schedule II controlled substance from a prescription transmitted orally or electronically by a prescriber. If the order is written by the prescriber, the prescription is in ink, signed and dated by the prescriber. If the prescription is orally or electronically transmitted, it must be reduced to hard copy. The prescriber provides a written prescription on a controlled substance form that meets the requirements of Health and Safety Code, section 11162.1 by the seventh day following the transmission of the initial order.

34. The most recent compounding self-assessment was completed on or about June 30, 2021. The compounding self-assessment form used by Respondent Pharmacy was adopted on 02/2012, an outdated version that did not reflect the pharmacy laws in effect at the time the compounding self-assessment had been completed. Respondent Reddy noted “yes” to several items in the compounding self-assessment at Respondent Pharmacy that were found not in compliance during the January 2023 inspections, including:

- Inactive ingredients were used in compounded medications, when the self-assessment indicated that Respondent Pharmacy “does not compound medication until it has prepared a written master formula;”
- A record for each compounded drug product includes “the master formula record, the quantity of each component used in compounding the drug product, and the manufacturer or supplier, the expiration date, and lot number of each component.” During the January 30, 2023 inspection, as noted above, some prescriptions did not include these requirements;
- Respondent Pharmacy’s “quality assurance plan includes the written procedures and standards for the following:” (1) including the verification, monitoring and review of the adequacy of the compounding processes as well as documentation of review of those processes by qualified pharmacy personnel, (2) qualitative and quantitative integrity, potency, quality and labeled strength analysis of compounded drug

1 products, and (3) the above-identified reports are retained by the pharmacy and  
2 were in compliance during the January 30, 2023 inspection, as detailed above in  
3 paragraphs 26-28, and incorporated herein by reference.

4 **Unauthorized Disclosure of Prescription and Medical Information**

5 35. On or about March 29, 2023, Respondents attempted to deliver medications to a  
6 patient at an assisted-living facility in Pinole, California, but did not deliver the prescribed  
7 medications to the patient, to an individual designated by the patient, or to a facility employee.  
8 Respondent's delivery driver instead left the prescriptions with a third-party caregiver at the  
9 assisted-living facility, who was neither an employee nor an authorized person to sign for the  
10 medications. The third-party caregiver left the medications in an "employee refrigerator,"  
11 unknown to any facility employee or to the patient. Because Respondents' delivery driver  
12 allowed the third-party caregiver to sign for and access the prescription medications, violating  
13 Respondents' policies and procedures for delivery of prescriptions, the patient's private  
14 prescription and medical information was disclosed to an individual unauthorized to receive that  
15 information.

16 **FIRST CAUSE FOR DISCIPLINE**

17 **(Failure to Maintain Pharmacy in Clean and Orderly Condition)**

18 36. Respondents are subject to disciplinary action under Code section 4301, subdivisions  
19 (j) and/or (o); and/or California Code of Regulation section 1714, subdivision (c), which requires  
20 that a pharmacy must be kept in a clean and orderly condition, including that it be well-ventilated  
21 and free from rodents and insects. Respondents failed to maintain in a clean and orderly  
22 condition in that on January 23, 2023, as described above in paragraph 23, and incorporated  
23 herein by reference, Respondents kept two dogs within the licensed premises.

24 **SECOND CAUSE FOR DISCIPLINE**

25 **(Failure to Notify Customers of Patient Right to Consultation)**

26 37. Respondents are subject to disciplinary action under Code section 4301, subdivisions  
27 (j) and/or (o); and/or California Code of Regulation section 1702.2, subdivision (b)(a), which  
28 requires that a pharmacist shall ensure that a patient receives written notice of his or her right to

1 request consultation, and that the patient received written notice of the hours of availability for  
2 consultation along with a telephone number to obtain oral consultation from a pharmacist.  
3 Respondents failed to ensure that patients received written notice of their right to request  
4 consultation in that on January 23 and 30, 2023, as described above in paragraph 24, and  
5 incorporated herein by reference, Respondents allowed prescriptions to leave Respondent  
6 Pharmacy without written notice of the patient's right to oral consultation.

### 7 **THIRD CAUSE FOR DISCIPLINE**

#### 8 **(Failure to Maintain Reconciliation Reports for Controlled Substances)**

9 38. Respondents are subject to disciplinary action under Code section 4301, subdivisions  
10 (j) and/or (o); and/or California Code of Regulation section 1715.65, which requires that  
11 Respondents complete a controlled substance inventory reconciliation report, as described above  
12 in paragraph 25, and incorporated herein by reference. Respondents did not complete the  
13 controlled substance reconciliation report, despite the prior notice Respondents received in  
14 August 2018.

### 15 **FOURTH CAUSE FOR DISCIPLINE**

#### 16 **(Failure to Follow Procedures Following Emergency Dispensing of Controlled Substances)**

17 39. Respondents are subject to disciplinary action under Code section 4301, subdivisions  
18 (j) and/or (o); and/or California Health and Safety Code section 11167, and/or Code of Federal  
19 Regulations section 1306.11(d), which requires that Respondents obtain written prescriptions  
20 within seven (7) days of dispensing controlled substances in response to an emergency oral and/or  
21 electronic order, and further failing to notify the California Bureau of Narcotic Enforcement in  
22 writing within 144 hours when no written prescription is received from the prescriber by the  
23 seventh day. As described above in paragraphs 26-28, and incorporated herein by reference,  
24 Respondents did not have an adequate system or procedure in place to ensure compliance with the  
25 post-dispensation of controlled substances after an oral and/or faxed prescription on an  
26 emergency basis, and did not submit written reports within 144 hours to the Bureau of Narcotic  
27 Enforcement whenever prescribers failed to provide follow-up written prescriptions within seven  
28 days of an oral and/or faxed order.

1 **FIFTH CAUSE FOR DISCIPLINE**

2 **(Failure to Determine Whether Emergency Controlled-Substance Requests Were Proper)**

3 40. Respondents are subject to disciplinary action under Code section 4301, subdivisions  
4 (j) and/or (o); and/or sections 4071 and 4072, which requires that Respondents take appropriate  
5 steps to determine that the person transmitting prescriptions for controlled substances are  
6 authorized to do so, and to record the name of the person requesting the prescription for  
7 controlled substances. As described above in paragraph 29, and incorporated herein by reference,  
8 Respondents accepted emergency oral and/or faxed requests for controlled substances from  
9 registered nurses, licensed vocational nurses, and/or other agents of prescribers without  
10 adequately ensuring that the agent was authorized to make the request on behalf of the prescriber.

11 **SIXTH CAUSE FOR DISCIPLINE**

12 **(Violation of Recordkeeping Requirements for Compounded Drugs)**

13 41. Respondents are subject to disciplinary action under Code section 4301, subdivisions  
14 (j) and/or (o); and/or California Code of Regulation sections 1753.3, subdivision (a) and 1735.2,  
15 subdivision (e), which require that Respondents keep accurate records of compounded drugs,  
16 including the drugs used in the compounded drug preparation, and the master formula for the  
17 compounded drug products. As described above in paragraph 30, and incorporated herein by  
18 reference, Respondents records for compounded drugs included ingredients listed on the  
19 compounding records that were not used in the actual compounding of the product, deviations  
20 from the master formula for the compounded preparations, and failure to document the quantify  
21 of each ingredient, along with information pertaining to the manufacturer, expiration date, and lot  
22 number of each component in the compounded drug preparations.

23 **SEVENTH CAUSE FOR DISCIPLINE**

24 **(Failure to Document Quality Reviews After Compounding Drugs)**

25 42. Respondents are subject to disciplinary action under Code section 4301, subdivisions  
26 (j) and/or (o); and/or California Code of Regulation sections 1753.3, subdivision (a), which  
27 requires that Respondents document quality reviews and required post-compounding process and  
28 procedures on a compounding record, as described above in paragraphs 28-30, and incorporated

1 herein by reference, Respondents records for compounded drugs did not properly document  
2 quality reviews post-compounding.

3 **EIGHTH CAUSE FOR DISCIPLINE**

4 **(Failure to Conduct Compounding Quality Assurance)**

5 43. Respondents are subject to disciplinary action under Code section 4301, subdivisions  
6 (j) and/or (o); and/or California Code of Regulation sections 1735.8, subdivision (c), which  
7 requires that Respondents conduct routine testing and analysis of specified compounded drug  
8 preparations to ensure integrity, potency, quality, and labeled strength, on at least an annual basis.  
9 As described above in paragraphs 31-32, and incorporated herein by reference, Respondents  
10 failed to ensure compliance with the quality assurance plan, including annual routine testing of  
11 compounded drug preparations to ensure integrity, potency, quality, and labeled strength.

12 **NINTH CAUSE FOR DISCIPLINE**

13 **(Unauthorized Disclosure of Prescription and Medical Information)**

14 44. Respondents are subject to disciplinary action under Code section 4301, subdivisions  
15 (j) and/or (o); and/or California Code of Regulation sections 1764, and/or Civil Code section  
16 56.10, subdivision (a), which allows for disclosure of medical information to patients and/or  
17 authorized representatives only. As described above in paragraph 35, and incorporated herein by  
18 reference, Respondents failed to follow their policies and procedures for prescription deliveries  
19 thus resulting in the unauthorized disclosure of confidential patient information.

20  
21 **DISCIPLINE CONSIDERATIONS**

22 45. To determine the level of discipline, if any, to be imposed on Respondent Pharmacy  
23 and/or Respondent Reddy (collectively, Respondents), Complainant further alleges that:

24 46. On or about November 6, 2019, Citation Nos. CI 2017 80450 and CI 2019 85711  
25 were issued to Respondents for issues including, but not limited to: unlicensed pharmacy  
26 technician (with expired license) practicing duties of pharmacy technician; Respondent Reddy's  
27 failure to complete community pharmacy self-assessment within 30 days of becoming  
28 pharmacist-in-charge on or about November 10, 2017; and Respondent Reddy's failure to

1 complete a compounding self-assessment within 30 days of becoming pharmacist-in-charge.

2 Those citations are now final and are incorporated by reference as if fully set forth herein.

3 47. On or about August 13, 2020, Citation Nos. CI 2019 85243 and CI 2020 88814 were  
4 issued to Respondents for issues including, but not limited to: failure to have a master formula on  
5 file prior to compounding medications; failing to properly label compounded drug preparations  
6 with name, strength, volume, or weight of each active ingredient; and failing to assign a 30-day  
7 beyond-use-date for compounded, water-containing topical formulations. Those citations are  
8 now final and are incorporated by reference as if fully set forth herein.

9 **OTHER MATTERS**

10 48. Pursuant to Code section 4307, if discipline is imposed on Respondent Pharmacy  
11 License Number PHY 51452, Respondent Pharmacy 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 Respondent Pharmacy License Number PHY 51452 is placed on probation, or until  
14 reinstatement if Respondent Pharmacy License Number PHY 51452 is revoked.

15 49. Pursuant to Code section 4307, if discipline is imposed on Respondent Pharmacy  
16 License Number PHY 51452 issued to Respondent Pharmacy while Respondent Reddy was the  
17 owner or manager, and had knowledge of or knowingly participated in any conduct for which the  
18 licensee was disciplined, Respondent Reddy shall be prohibited from serving as a manager,  
19 administrator, owner, member, officer, director, associate, or partner of a licensee for five years if  
20 Respondent Pharmacy License Number PHY 51452 is placed on probation, or until reinstatement  
21 if Respondent Pharmacy License Number PHY 51452 is revoked.

22 50. Pursuant to Code section 4307, if discipline is imposed on Respondent Reddy's  
23 Pharmacist License Number RPH 59795, Respondent Reddy shall be prohibited from serving as a  
24 manager, administrator, owner, member, officer, director, associate, or partner of a licensee for  
25 five years if License Number RPH 59795 is placed on probation, or until reinstatement if License  
26 Number RPH 59795 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 Pharmacy License Number PHY 51452, issued to VLS Clayworth Pharmacy, Inc.;

2. Revoking or suspending Registered Pharmacist Number RPH 59795, issued to Sudhir V. Reddy;

3. Prohibiting VLS Clayworth Pharmacy, Inc., from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy License Number PHY 51452 is placed on probation, or until reinstatement if Pharmacy License Number PHY 51452 is revoked;

4. Prohibiting Sudhir V. Reddy from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy License Number PHY 51452 is placed on probation, or until reinstatement if Pharmacy License Number PHY 51452 is revoked;

5. Prohibiting Sudhir V. Reddy from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Respondent Reddy's Pharmacist License Number RPH 59795 is placed on probation, or until reinstatement if Pharmacist License Number RPH 59795 is revoked;

6. Ordering VLS Clayworth Pharmacy, Inc. and Sudhir V. Reddy, RPH, to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and, if placed on probation, the costs of probation monitoring; and,

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

DATED: 6/12/2024

Sodergren,  
Anne@DCA

 Digitally signed by Sodergren,  
Anne@DCA  
Date: 2024.06.12 19:58:07 -07'00'

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

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