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California State
Board of Pharmacy

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October 15, 2026

VIA CERTIFIED MAIL / RETURN RECEIPT REQUESTED

Executive Officer
California State Board of Pharmacy
2720 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

RE: Formal Administrative Petition for Rulemaking under Gov. Code § 11340.6
Mandatory Veterinary Drug References in Human Pharmacies

Dear Executive Officer,

Enclosed please find a formal **Petition for Rulemaking** submitted pursuant to California Government Code Section 11340.6. As the primary proponent of the enacted California Business and Professions Code (BPC) Section 4069, I am filing this petition to request that the Board initiate immediate regulatory action to mandate that pharmacies dispensing veterinary dangerous drugs maintain ready access to specialized veterinary drug reference materials.

This matter was previously raised in person before the Enforcement and Compounding Committee during its public meeting on October 1, 2026. To ensure consumer protection and to secure a workable regulatory mechanism for full compliance with the documentation mandates of BPC § 4069, the implementation of a mandatory veterinary reference rule is essential. Pursuant to **California Government Code Section 11340.7**, the Board is required to issue a formal written response either denying this petition or setting the matter for a public hearing within thirty (30) days of receipt.

Thank you for your attention to this vital public safety matter. I look forward to your formal determination.

Sincerely,

Salomon Stupp
Proponent of CA BPC § 4069

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

In the Matter of the Petition for Rulemaking to Amend Title 16, California Code of Regulations, regarding Mandated Veterinary Drug References.	**PETITION FOR RULEMAKING** (Gov. Code, § 11340.6)
Salomon Stupp, *Petitioner.*	**Date:** October 15, 2026

I. INTRODUCTION AND STATEMENT OF STANDING

Pursuant to California Government Code Section 11340.6, Petitioner, the primary legislative proponent and sponsor of enacted California Business and Professions Code (BPC) Section 4069, hereby submits this formal Petition for Rulemaking to the State Board of Pharmacy (the "Board"). On October 1, 2026, Petitioner appeared in person before the Board's Enforcement and Compounding Committee to request administrative harmonization of retail pharmacy standards with current veterinary consumer protection objectives. Having observed an absence of immediate committee intent to initiate rulemaking, Petitioner brings this formal petition to trigger the Board's strict statutory obligations under Government Code Section 11340.7.

Petitioner possesses a clear, direct, and beneficial interest in the proper execution and enforcement of BPC Section 4069. As the architect of that framework, Petitioner has standing to ensure that the regulatory rules promulgated by this Board do not actively frustrate the consumer safety mechanisms embedded in statutory law.

II. THE REGULATORY GAP AND INHERENT CONFLICT WITH BPC 4069

BPC Section 4069 strictly mandates that a pharmacist dispensing a veterinary prescription must provide or offer veterinary-specific drug documentation to the consumer. However, the Board does not currently mandate that human retail pharmacies maintain access to dedicated veterinary drug references (e.g., *Plumb's Veterinary Drug Handbook*). Because a human pharmacist's education spans human biochemistry and physiology, cross-species dispensing without dedicated animal references creates an imminent risk of toxic dosing and critical prescription validation errors. A pharmacy cannot logically or safely generate or verify veterinary-specific documentation to fulfill BPC Section 4069 without the foundational veterinary texts

necessary to interpret the prescription. The absence of a reference mandate actively subverts the public safety purpose of BPC Section 4069.

III. PROPOSED REGULATORY TEXT

Petitioner requests that the Board adopt standard language harmonized with the National Association of Boards of Pharmacy (NABP) Model State Pharmacy Act. Petitioner proposes the addition of Section 1707.6 to Title 16, Division 17 of the California Code of Regulations:

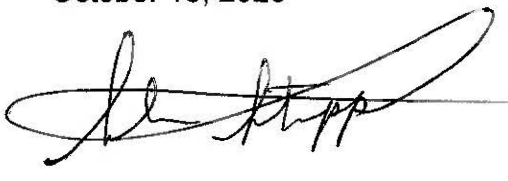
> ***Proposed Section 1707.6. Veterinary Drug Reference Requirements.***
> *Any pharmacy that dispenses dangerous drugs or devices for veterinary use shall maintain inside its compounding and dispensing area ready access to at least one current, comprehensive veterinary drug reference text or electronic database covering animal-specific dosages, indications, contraindications, and drug interactions, sufficient to comply with the veterinary drug documentation requirements of Business and Professions Code Section 4069.*

IV. CONCLUSION AND 30-DAY STATUTORY TIMELINE

The Board's overarching statutory mandate is the absolute protection of the public. Failing to provide pharmacists with the basic regulatory tools needed to safely dispense dangerous cross-species drugs constitutes a clear omission of this duty. Pursuant to California Government Code Section 11340.7, the Board is legally required to respond to this petition in writing within 30 days of receipt, by either setting the matter for a public regulatory hearing or issuing a formal denial outlining its legal and factual justifications.

Respectfully submitted,

October 15, 2026



Salomon Stupp
Petitioner and Sponsor of CA BPC § 4069