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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. 3689

13 **PRINCE SINGH SOHAL**
5144 W. Austin Way
Fresno, CA 93722

ACCUSATION

14 Pharmacy Technician License
Number 68528

15
16 Respondent.

17
18
19 Complainant alleges:

20 **PARTIES**

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

23 2. On or about April 6, 2006, the Board of Pharmacy issued Pharmacy Technician
24 Registration Number TCH 68528 to Prince Singh Sohal (Respondent). The Pharmacy Technician
25 Registration was in full force and effect at all times relevant to the charges brought herein and
26 will expire on July 31, 2011, unless renewed.

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1 (p) Actions or conduct that would have warranted denial of a license.

2 **COST RECOVERY**

3 7. Section 125.3 of the Code provides, in pertinent part, that the Board or Director may
4 request the administrative law judge to direct a licentiate found to have committed a violation or
5 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
6 and enforcement of the case.

7 **FIRST CAUSE FOR DISCIPLINE**

8 (Criminal Conviction)

9 8. Respondent's license is subject to disciplinary action under sections 4300 and 4301,
10 subdivision (l), on the grounds of unprofessional conduct in that on November 17, 2009,
11 Respondent was convicted in the case titled *People v. Prince Singh Sohal*, Sutter County Case
12 No. CRF09-0617, on his plea of no contest to violating Penal Code section 594(b)(1)
13 vandalism/malicious mischief), a felony. Said crime is substantially related to the qualifications,
14 functions, and duties of a pharmacy technician. The circumstances are as follows:

15 9. On or about November 8, 2009, Respondent and four males, in an orchard in Sutter
16 County, California, beat a vehicle with a bat and then set it on fire. The vehicle, a 2006 Mazda
17 sedan, belonged to a non-present sixth male who was a friend of Respondent's. Law enforcement
18 officers arrived at the scene of the fire and interviewed the five males, including Respondent.
19 The arresting police officer observed that Respondent emitted a strong odor of gasoline.
20 Respondent stated to the officer that he had spilled some gasoline on his clothing while he was
21 fueling his own vehicle. He denied knowledge of the fire. The officers located gas containers,
22 the Mazda's license plates, and a bat in the back of a truck, in which Respondent was a passenger,
23 at the scene. Respondent committed said act to assist the owner of the vehicle to obtain insurance
24 monies relating to the vehicle.

25 **SECOND CAUSE FOR DISCIPLINE**

26 (Act Involving Moral Turpitude, Dishonesty, Fraud, Deceit, or Corruption)

27 10. Respondent's license is subject to disciplinary action under sections 4300 and 4301,
28 subdivision (f), on the grounds of unprofessional conduct in that on or about November 8, 2009,

1 Respondent committed an act or acts involving moral turpitude, dishonesty, fraud, deceit, or
2 corruption as set forth in paragraph 9, above, incorporated herein by this reference.

3 **PRAYER**

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

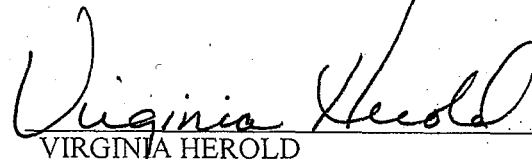
6 1. Revoking or suspending Pharmacy Technician Registration Number TCH 68528,
7 issued to Respondent Prince Singh Sohal.

8 2. Ordering Respondent Prince Singh Sohal to pay the Board of Pharmacy the
9 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
10 Professions Code section 125.3;

11 3. Taking such other and further action as deemed necessary and proper.

12
13 DATED: _____

9/23/10



VIRGINIA HEROLD
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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