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

10 In the Matter of the Accusation Against:

Case No. 4753

11 **TAHMINA ZADRAN**
12 **8389 Mayhews Landing Road**
13 **Newark, CA 94560**

A C C U S A T I O N

14 **Pharmacy Technician License No. TCH 79450**

15 Respondent.

16
17 Complainant alleges:

18 PARTIES

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

21 2. On or about December 3, 2007, the Board of Pharmacy issued Pharmacy Technician
22 License Number TCH 79450 to Tahmina Zadran (Respondent). The Pharmacy Technician
23 License was in full force and effect at all times relevant to the charges brought herein and will
24 expire on October 31, 2013, unless renewed.

25 JURISDICTION

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

1 e. On or about January 25, 2013, imposition of sentence was suspended in favor
2 of a period of court probation of eighteen (18) months, with terms and conditions including a ban
3 on engaging in any caretaking or fiduciary duties for elderly or dependent adults, eighty (80)
4 hours of community service, and payment of fines, fees, and restitution.

5 THIRD CAUSE FOR DISCIPLINE

6 (Unprofessional Conduct)

7 14. Respondent is subject to discipline under section 4301 of the Code in that
8 Respondent, as described in paragraphs 11 to 13 above, engaged in unprofessional conduct.

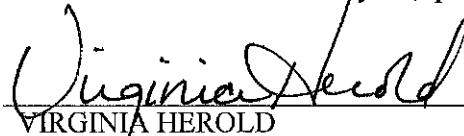
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10 PRAYER

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

- 13 1. Revoking or suspending Pharmacy Technician License Number TCH 79450, issued
14 to Tahmina Zadran (Respondent);
- 15 2. Ordering Respondent to pay the Board the reasonable costs of the investigation and
16 enforcement of this case, pursuant to Business and Professions Code section 125.3;
- 17 3. Taking such other and further action as is deemed necessary and proper.

18 DATED: _____

9/6/13



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

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