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

11 In the Matter of the Accusation Against:  
12  
13 **LEAFA PRINTING PLUS LLC**  
**5862 Bolsa Avenue, Ste. 102**  
**Huntington Beach, CA 92649**  
14  
15 **Wholesale Permit No. WLS 5853**  
16 Respondent.

Case No. 5066

**A C C U S A T I O N**

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18 Complainant alleges:

19 **PARTIES**

- 20 1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity  
21 as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.  
22 2. On or about September 21, 2011, the Board of Pharmacy issued Wholesale Permit  
23 Number WLS 5853 to Leafa Printing Plus LLC (Respondent). The Wholesale Permit expired on  
24 September 1, 2016, and has not been 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 unless otherwise indicated.



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7. Section 4302 of the Code states:

The Board may deny, suspend or revoke any license where conditions exist in relation to any person holding 10 percent or more of the ownership interest or where conditions exist in relation to any officer, director, or other person with management or control of the license that would constitute grounds for disciplinary action against a licensee.

**COST RECOVERY**

8. Section 125.3 of the Code provides, 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.

**FACTUAL ALLEGATIONS**

9. At all times relevant herein, Robert George Farah II was a member who had management or control of Respondent.

10. On or about October 5, 2015, in a criminal proceeding entitled *The People of the State of California vs. Robert George Farah II*, Orange County Superior Court Case Number 11HF3139, Robert George Farah II was convicted on his plea of guilty to violating Penal Code section 487(a)/506, embezzlement by fiduciary of trust, felonies and admitted enhancements of Penal Code section 12022.6(a)(2).

11. On May 6, 2016, Robert George Farah II was placed on three years formal probation and ordered to serve 364 days in jail and pay all applicable fees, fines and restitution.

12. In his plea agreement, Robert George Farah II admitted that he willfully, unlawfully and fraudulently appropriated GEP Properties LLC and GEP Properties II LLC monies entrusted to him for "personal uses and purposes other than that for which the money was entrusted to [him] in a fiduciary capacity, within the meaning of Penal Code section 487(a)/506." He also admitted that within the meaning of Penal Code section 12022.6(a)(2), the amount of loss involved, including legal fees, exceeded two-hundred thousand dollars.

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(October 5, 2015 Criminal Convictions for Embezzlement by Fiduciary of Trust)**

3 13. Respondent has subjected its wholesale permit to discipline under sections 4302, 490  
4 and 4301, subdivision (l) of the Code in that its member was convicted of crimes that are  
5 substantially related to the qualifications, duties, and functions of a wholesaler as set forth in  
6 paragraphs 9 through 12.

7 **SECOND CAUSE FOR DISCIPLINE**

8 **(Making False Documents)**

9 14. Respondent has subjected its wholesale permit to disciplinary action under sections  
10 4302 and 4301, subdivision (g) of the Code for unprofessional conduct in that Robert George  
11 Farah II, a member of Respondent, knowingly made false documents in connection with the  
12 activities described in paragraphs 9 through 12, above.

13 **THIRD CAUSE FOR DISCIPLINE**

14 **(Dishonest Acts)**

15 15. Respondent has subjected its wholesale permit to disciplinary action under sections  
16 4302 and 4301, subdivision (f) of the Code in that Robert George Farah II, a member of  
17 Respondent, committed acts involving dishonesty, fraud, deceit, or corruption, as detailed in  
18 paragraphs 9 through 12, above, which are incorporated herein by reference.

19 **FOURTH CAUSE FOR DISCIPLINE**

20 **(Unprofessional Conduct)**

21 16. Respondent has subjected its wholesale permit to disciplinary action under sections  
22 4302 and 4301 for unprofessional conduct in that Robert George Farah II, a member of  
23 Respondent, engaged in the activities described in paragraphs 9 through 12 above, which is  
24 incorporated herein by reference.

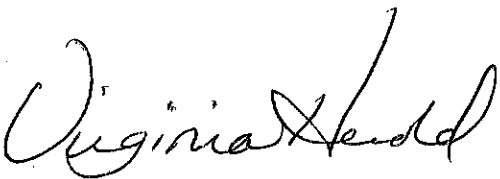
25 **PRAYER**

26 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
27 and that following the hearing, the Board of Pharmacy issue a decision:  
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1. Revoking or suspending Wholesale Permit Number WLS 5853, issued to Leafa Printing Plus LLC;
2. Ordering Leafa Printing Plus LLC 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,
3. Taking such other and further action as deemed necessary and proper.

DATED: 7/10/17



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

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