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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 Statement of Issues
12 Against:

Case No. SI 5161

13 **WAZHMA RAHIMI**
14 **a.k.a. WAZHMA NILOFAR RAHIMI**

STATEMENT OF ISSUES

15 **Intern Pharmacist Registration Applicant**

16 Respondent.

17
18 Complainant alleges:

19 PARTIES

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

22 2. On or about September 24, 2013, the Board of Pharmacy, Department of Consumer
23 Affairs received an Application for Registration as an Intern Pharmacist from Wazhma Rahimi,
24 also known as Wazhma Nilofar Rahimi (Respondent). On or about September 19, 2013, Respondent
25 certified under penalty of perjury as to the truthfulness of all statements, answers, and
26 representations in the Application. The Board denied the application on or about January 30,
27 2014.

1 denial in that she committed acts involving dishonesty, with the intent to substantially benefit
2 herself. (Bus. & Prof. Code § 480, subd. (a)(2).) The circumstances are set forth in paragraph
3 eight, above.

4 THIRD CAUSE FOR DENIAL OF APPLICATION
(Committed Acts Which if Done by Licensee Would Be Cause for Discipline)
5 (Bus. & Prof. Code §§ 480, subd. (a)(3), and 4301, subd. (l))

6 11. Respondent has subjected her application for an Intern Pharmacist Registration to
7 denial in that she committed acts, which if done by an Intern Pharmacist, would constitute
8 grounds for discipline. (Bus. & Prof. Code §§ 480, subd. (a)(3), and 4301, subd. (l).) The
9 circumstances are set forth in paragraph eight, above.

10 MATTER IN AGGRAVATION

11 12. Complainant further alleges, as a matter in aggravation, that in a default decision
12 effective on or about August 18, 2011, the Department of Real Estate (DRE) revoked
13 Respondent's mortgage broker based on Respondent's criminal conviction (DRE Case No. H-
14 11093 SF). Respondent failed to reveal the revocation in her application for registration as an
15 Intern Pharmacist. She answered "No" to Question No. 10, which asked, "Have you ever had a
16 pharmacy permit, or any professional or vocational license or registration, denied or disciplined
17 by a government authority in this state or any other state?"

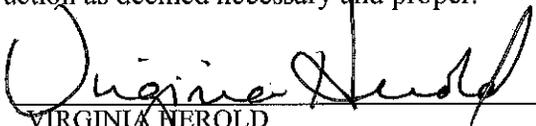
18 PRAYER

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

21 1. Denying the application of Wazhma Rahimi, also known as Wazhma Nilofar Rahimi for
22 an Intern Pharmacist Registration;

23 2. Taking such other and further action as deemed necessary and proper.

24 DATED: 12/3/14

25 
26 VIRGINIA NEROLD
27 Executive Officer
28 Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant