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

In the Matter of the Accusation Against: FRED L. GOODMAN 936 N. San Vicente Blvd. West Hollywood, CA 90069 Pharmacist License No. RPH 37591 Respondent.	Case No. 3055

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on August 8, 2008.

It is so ORDERED July 9, 2008.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By Kenneth H. Schell
KENNETH H. SCHELL
Board President

EDMUND G. BROWN JR., Attorney General
of the State of California
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Attorneys for Complainant

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

In the Matter of the Accusation Against: FRED L. GOODMAN 936 N. San Vicente Blvd. West Hollywood, CA 90069 Pharmacist License No. RPH 37591 Respondent.	Case No. 3055 **STIPULATED SETTLEMENT AND DISCIPLINARY ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled proceedings that the following matters are true:

PARTIES

1. Virginia Herold (Complainant) is the Executive Officer of the Board of Pharmacy. She brought this action solely in her official capacity and is represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Antoinette B. Cincotta, Deputy Attorney General.

2. Respondent FRED L. GOODMAN (Respondent) is represented in this proceeding by attorney Mark Foster, Esq., whose address is Duran & Thomas, 777 East Tahquitz Canyon Way, Ste. 200-58, Palm Springs, CA 92262.

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3. On or about March 19, 1983, the Board of Pharmacy issued Pharmacist License No. RPH 37591 to Fred L. Goodman (Respondent). The Pharmacist License was in full force and effect at all times relevant to the charges brought in Accusation No. 3055 and will expire on November 30, 2008, unless renewed.

JURISDICTION

4. On or about December 17, 2007, Accusation No. 3055 was filed before the Board of Pharmacy (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on December 31, 2007. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 3055 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 3055. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 3055.

9. Respondent agrees that his pharmacist license is subject to discipline and he agrees to be bound by the Board of Pharmacy (Board) 's imposition of discipline as set forth in the Disciplinary Order below.

CONTINGENCY

10. This stipulation shall be subject to approval by the Board of Pharmacy. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Pharmacy may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or his counsel. By signing the stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

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DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Pharmacist License No. RPH 37591 issued to Respondent Fred L. Goodman (Respondent) is revoked. However, the revocation is stayed and Respondent is placed on probation for three (3) years on the following terms and conditions:

1. **Actual Suspension - Pharmacist.** Pharmacy License No. RPH 37591, issued to Respondent Fred L. Goodman, is suspended for a period of ten (10) days.

During suspension, Respondent shall not enter any pharmacy area or any portion of the licensed premises of a wholesaler, veterinary food-animal drug retailer or any other distributor of drugs which is licensed by the Board, or any manufacturer, or where dangerous drugs and devices or controlled substances are maintained. Respondent shall not practice pharmacy nor do any act involving drug selection, selection of stock, manufacturing, compounding, dispensing or patient consultation; nor shall Respondent manage, administer, or be a consultant to any licensee of the Board, or have access to or control the ordering, manufacturing or dispensing of dangerous drugs and devices or controlled substances.

Respondent shall not engage in any activity that requires the professional judgment of a pharmacist. Respondent shall not direct or control any aspect of the practice of pharmacy. Respondent shall not perform the duties of a pharmacy technician or an exemptee for any entity licensed by the Board. Subject to the above restrictions, Respondent may continue to own or hold an interest in any pharmacy in which he holds an interest at the time this decision becomes effective unless otherwise specified in this order.

2. **Obey All Laws.** Respondent shall obey all state and federal laws and regulations substantially related to or governing the practice of pharmacy.

Respondent shall report any of the following occurrences to the Board, in writing, within 72 hours of such occurrence:

- an arrest or issuance of a criminal complaint for violation of any provision of the Pharmacy Law, state and federal food and drug laws, or state and federal controlled substances laws

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- a plea of guilty or nolo contendere in any state or federal criminal proceeding to any criminal complaint, information or indictment
- a conviction of any crime
- discipline, citation, or other administrative action filed by any state and federal agency which involves Respondent's license or which is related to the practice of pharmacy or the manufacturing, obtaining, handling or distribution or billing or charging for any drug, device or controlled substance.

3. **Reporting to the Board.** Respondent shall report to the Board quarterly. The report shall be made either in person or in writing, as directed. Respondent shall state under penalty of perjury whether there has been compliance with all the terms and conditions of probation. If the final probation report **is not** made as directed, probation shall be extended automatically until such time as the final report is made and accepted by the Board.

4. **Interview with the Board.** Upon receipt of reasonable notice, Respondent shall appear in person for interviews with the Board upon request at various intervals at a location to be determined by the Board. Failure to appear for a scheduled interview without prior notification to Board staff shall be considered a violation of probation.

5. **Cooperation with Board Staff.** Respondent shall cooperate with the Board's inspectional program and in the Board's monitoring and investigation of Respondent's compliance with the terms and conditions of his probation. Failure to comply shall be considered a violation of probation.

6. **Continuing Education.** Respondent shall provide evidence of efforts to maintain skill and knowledge as a pharmacist as directed by the Board.

7. **Notice to Employers.** Respondent shall notify all present and prospective employers of the decision in Case No. 3055, and the terms, conditions and restrictions imposed on Respondent by the decision. Within 30 days of the effective date of this decision, and within 15 days of Respondent undertaking new employment, Respondent shall cause his direct supervisor, pharmacist-in-charge and/or owner to report to the Board in

writing acknowledging the employer has read the decision in Case No. 3055.

If Respondent works for or is employed by or through a pharmacy employment service, Respondent must notify the direct supervisor, pharmacist-in-charge, and/or owner at every pharmacy of the and terms conditions of the decision in Case No. 3055 in advance of the Respondent commencing work at each pharmacy.

"Employment" within the meaning of this provision shall include any full-time, part-time, temporary, relief or pharmacy management service as a pharmacist, whether the Respondent is considered an employee or independent contractor.

8. **No Preceptorships, Supervision of Interns, Being Pharmacist-in-Charge (PIC), or Serving as a Consultant.** Respondent shall not supervise any intern pharmacist or perform any of the duties of a preceptor, nor shall Respondent be the pharmacist-in-charge of any entity licensed by the Board unless otherwise specified in this order.

9. **Reimbursement of Board Costs.** Respondent shall pay to the Board its costs of investigation and prosecution in the amount of $6,030.00 . Respondent shall make said payments on a quarterly basis, and all costs shall be paid in full within two years of the effective date of this decision.

The filing of bankruptcy by Respondent shall not relieve Respondent of his responsibility to reimburse the Board its costs of investigation and prosecution.

10. **Probation Monitoring Costs.** Respondent shall pay the costs associated with probation monitoring as determined by the Board each and every year of probation. Such costs shall be payable to the Board at the end of each year of probation. Failure to pay such costs shall be considered a violation of probation.

11. **Status of License.** Respondent shall, at all times while on probation, maintain an active current license with the Board, including any period during which suspension or probation is tolled.

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If Respondent's license expires or is canceled by operation of law or otherwise, upon renewal or reapplication, Respondent's license shall be subject to all terms and conditions of this probation not previously satisfied.

12. **License Surrender while on Probation/Suspension.** Following the effective date of this decision, should Respondent cease practice due to retirement or health, or be otherwise unable to satisfy the terms and conditions of probation, Respondent may tender his license to the Board for surrender. The Board shall have the discretion whether to grant the request for surrender or take any other action it deems appropriate and reasonable. Upon formal acceptance of the surrender of the license, Respondent will no longer be subject to the terms and conditions of probation.

Upon acceptance of the surrender, Respondent shall relinquish his pocket license to the Board within 10 days of notification by the Board that the surrender is accepted. Respondent may not reapply for any license from the Board for three years from the effective date of the surrender. Respondent shall meet all requirements applicable to the license sought as of the date the application for that license is submitted to the Board.

13. **Notification of Employment/Mailing Address Change.** Respondent shall notify the Board in writing within 10 days of any change of employment. Said notification shall include the reasons for leaving and/or the address of the new employer, supervisor or owner and work schedule if known. Respondent shall notify the Board in writing within 10 days of a change in name, mailing address or phone number.

14. **Ethics Course.** Within sixty (60) calendar days of the effective date of this decision, respondent shall enroll in a course in ethics, at respondent''s expense, approved in advance by the board or its designee. Failure to initiate the course during the first year of probation, and complete it within the second year of probation, is a violation of probation.

Respondent shall submit a certificate of completion to the board or its designee within five days after completing the course examination to test the Respondent's knowledge of the course.

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15. **No Ownership of Premises.** Respondent shall not own, have any legal or beneficial interest in, or serve as a manager, administrator, member, officer, director, associate, or partner of any business, firm, partnership, or corporation currently or hereinafter licensed by the Board. Respondent shall sell or transfer any legal or beneficial interest in any entity licensed by the Board within 90 days following the effective date of this decision and shall immediately thereafter provide written proof thereof to the Board.

16. **Tolling of Probation.** Respondent shall work at least 40 hours in each calendar month as a pharmacist and at least an average of 80 hours per month in any six consecutive months. Failure to do so will be a violation of probation. If Respondent has not complied with this condition during the probationary term, and Respondent has presented sufficient documentation of his good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of Respondent's probation period up to one year without further hearing in order to comply with this condition.

17. **Tolling of Suspension.** If Respondent leaves California to reside or practice outside this state, for any period exceeding 10 days (including vacation), Respondent must notify the Board in writing of the dates of departure and return. Periods of residency or practice outside the state - or any absence exceeding a period of 10 days shall not apply to the reduction of the suspension period.

Respondent shall not practice pharmacy upon returning to this state until notified by the Board that the period of suspension has been completed.

18. **Violation of Probation.** If Respondent violates probation in any respect, the Board, after giving Respondent notice and an opportunity to be heard, may revoke probation and carry out the disciplinary order which was stayed. If a petition to revoke probation or an accusation is filed against Respondent during probation, the Board shall have continuing jurisdiction and the period of probation shall be extended, until the petition to revoke probation or accusation is heard and decided.

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If Respondent has not complied with any term or condition of probation, the Board shall have continuing jurisdiction over Respondent, and probation shall automatically be extended until all terms and conditions have been satisfied or the Board has taken other action as deemed appropriate to treat the failure to comply as a violation of probation, to terminate probation, and to impose the penalty which was stayed.

19. **Completion of Probation.** Upon successful completion of probation, Respondent's license will be fully restored.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Mark Foster, Esq. I understand the stipulation and the effect it will have on my Pharmacist. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: 4/22/08

FRED L. GOODMAN
Respondent

I have read and fully discussed with Respondent Fred L. Goodman the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 4/22/08

MARK FOSTER, ESQ.
Attorney for Respondent

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04/22/2008 10:48 FAX 3102880744 Capitol Drugs 002/003

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

DATED: 4/23/2008

EDMUND G. BROWN JR., Attorney General
of the State of California

LINDA SCHNEIDER
Supervising Deputy Attorney General

ANTOINETTE B. CINCOTTA
Deputy Attorney General

Attorneys for Complainant

DOJ Matter ID: SD2007800033
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Exhibit A

Accusation No. 3055

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Attorneys for Complainant

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

In the Matter of the Accusation Against: FRED LAVERN GOODMAN 936 N. San Vicente Blvd. West Hollywood, CA 90069 Pharmacist No. RPH 37591 Respondent.	Case No. 3055 **ACCUSATION**

Complainant alleges:

PARTIES

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

2. On or about March 19, 1983, the Board of Pharmacy issued Pharmacist Number RPH 37591 to Fred Lavern Goodman (Respondent). The Pharmacist was in full force and effect at all times relevant to the charges brought herein and will expire on November 30, 2008, unless renewed.

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JURISDICTION AND STATUTORY PROVISIONS

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

4. **Section 4300** of the Code states, in pertinent part:

"(a) Every license issued may be suspended or revoked.

"(b) The board shall discipline the holder of any license issued by the board, whose default has been entered or whose case has been heard by the board and found guilty, by any of the following methods:

"(1) Suspending judgment.

"(2) Placing him or her upon probation.

"(3) Suspending his or her right to practice for a period not exceeding one year.

"(4) Revoking his or her license.

"(5) Taking any other action in relation to disciplining him or her as the board in its discretion may deem proper."

". . . .

"(e) The proceedings under this article shall be conducted in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the Government Code, and the board shall have all the powers granted therein. The action shall be final, except that the propriety of the action is subject to review by the superior court pursuant to Section 1094.5 of the Code of Civil Procedure."

5. **Section 4301** of the Code states, in pertinent part:

"The board shall take action against any holder of a license who is guilty of unprofessional conduct or whose license has been procured by fraud or misrepresentation or issued by mistake. Unprofessional conduct shall include, but is not limited to, any of the following:

". . . .

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"(f) The commission of any act involving moral turpitude, dishonesty, fraud, deceit, or corruption, whether the act is committed in the course of relations as a licensee or otherwise, and whether the act is a felony or misdemeanor or not.

"(g) Knowingly making or signing any certificate or other document that falsely represents the existence or nonexistence of a state of facts.

". . . .

"(j) The violation of any of the statutes of this state, or any other state, or of the United States regulating controlled substances and dangerous drugs.

". . . .

"(o) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of or conspiring to violate any provision or term of this chapter or of the applicable federal and state laws and regulations governing pharmacy, including regulations established by the board or by any other state or federal regulatory agency."

6. **Section 4059** of the Code states, in pertinent part, that a person may not furnish any dangerous drug except upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7.

7. **Section 4324** of the Code states:

"(a) Every person who signs the name of another, or of a fictitious person, or falsely makes, alters, forges, utters, publishes, passes, or attempts to pass, as genuine, any prescription for any drugs is guilty of forgery and upon conviction thereof shall be punished by imprisonment in the state prison, or by imprisonment in the county jail for not more than one year.

"(b) Every person who has in his or her possession any drugs secured by a forged prescription shall be punished by imprisonment in the state prison, or by imprisonment in the county jail for not more than one year."

8. **Section 4022** of the Code states:

"Dangerous drug" or "dangerous device" means any drug or device unsafe for self-use, except veterinary drugs that are labeled as such, and includes the following:

"(a) Any drug that bears the legend: "Caution: federal law prohibits dispensing without prescription," "Rx only," or words of similar import.

"(b) Any device that bears the statement: "Caution: federal law restricts this device to sale by or on the order of a _____," "Rx only," or words of similar import, the blank to be filled in with the designation of the practitioner licensed to use or order use of the device.

"(c) Any other drug or device that by federal or state law can be lawfully dispensed only on prescription or furnished pursuant to Section 4006."

9. **Health and Safety Code section 11171** states:

"No person shall prescribe, administer, or furnish a controlled substance except under the conditions and in the manner provided by this division."

10. **Health and Safety Code section 11173** provides, in pertinent part:

"(a) No person shall obtain or attempt to obtain controlled substances, or procure or attempt to procure the administration of or prescription for controlled substances, (1) by fraud, deceit, misrepresentation, or subterfuge; or (2) by the concealment of a material fact."

COST RECOVERY

11. **Section 125.3** of the Code states, 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.

DRUGS

12. **"Norco"** is a trade name for hydrocodone and is a Schedule III controlled substance as designated by Health and Safety Code section 11056, subdivision (e)(4) and a dangerous drug within the meaning of Business and Professions Code section 4022 in that it requires a prescription under federal law.

13. **"Serostim"** is a trade name for Norditropin and it is a dangerous drug within the meaning of section 4022 in that it requires a prescription under federal law.

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14. **"Nolvadex"** is a trade name for Tamoxifen and it is a dangerous drug within the meaning of section 4022 in that it requires a prescription under federal law.

15. **"Nandrolone"** is a Schedule III controlled substance as designated by Health and Safety Code section 11056, subdivision (f)(19) and a dangerous drug within the meaning of section 4022 in that it requires a prescription under federal law.

16. **"Testosterone"** is a Schedule III controlled substance as designated by Health and Safety Code section 11056, subdivision (f)(30) and is a dangerous drug within the meaning of section 4022 in that it requires a prescription under federal law.

17. **"Amoxil"** is a trade name for Amoxicillin and it is a dangerous drug within the meaning of section 4022 in that it requires a prescription under federal law.

CAUSE FOR DISCIPLINE

(Unprofessional Conduct - Furnishing Dangerous Drugs without a Valid Prescription in Violation of Pharmacy and Drug Laws)

18. Respondent is subject to disciplinary action under section 4301(f), (g), (j) and (o) in that he forged and then filled eight prescriptions for dangerous drugs from the pharmacy where he worked without a prescription for the medications in violation sections 4059 and 4324, and Health and Safety Code sections 11171 and 11173. The circumstances are as follows:

19. Community Prescription Center, Palm Springs is located at 555 south Sunrise Way, Suite 112-113, in Palm Springs, California, and has been continually licensed by the Board since November 29, 2000. Respondent worked as the Pharmacist-In-Charge of Community Prescription Center, Palm Springs from on or about October 18, 2005 to on or about May 30, 2006.

20. On or about June 1, 2006, Community Prescription Center, Palm Springs sent a letter to the Board advising that Respondent had been terminated from the pharmacy on May 30, 2006 after he admitted forging eight (8) prescriptions and diverting controlled substances for a patient "Franco Mansour" using the name and DEA number of Dr. I.L. Dr. I.L

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did not have a patient by the name of "Franco Mansour" and did not prescribe any dangerous drugs to a "Franco Mansour."

21. **Prescription No. 1:** On or about March 9, 2006, Respondent forged and dispensed prescription number 6674685 in the name of "Franco Mansour" for 100 20 mg tablets of Tamoxifen using the name and DEA number of Dr. I.L.

22. **Prescription No. 2:** On or about March 9, 2006, Respondent forged and dispensed prescription number 6674687 in the name of "Franco Mansour" for 1.50 ml of 15 mg vials of Norditropin using the name and DEA number of Dr. I.L.

23. **Prescription No. 3:** On or about March 9, 2006, Respondent forged and dispensed prescription number 4458012 in the name of "Franco Mansour" for 30 ml of 200 mg Testosterone using the name and DEA number of Dr. I.L.

24. **Prescription No. 4:** On or about March 16, 2006, Respondent forged and dispensed prescription number 4458116 in the name of "Franco Mansour" for 30 ml of 200 mg of Testosterone using the name and DEA number of Dr. I.L.

25. **Prescription No. 5:** On or about March 16, 2006, Respondent forged and dispensed prescription number 6675116 in the name of "Franco Mansour" for 100 20 mg tablets of Tamoxifen using the name and DEA number of Dr. I.L.

26. **Prescription No. 6:** On or about March 16, 2006, Respondent forged and dispensed prescription number 4458115 in the name of "Franco Mansour" for 40 200 decmg/ml vials of Nandrolone using the name and DEA number of Dr. I.L.

27. **Prescription No. 7:** On or about April 25, 2006, Respondent forged and dispensed prescription number 6677110 in the name of "Franco Mansour" for 40 875 mg tablets of Amoxicillin using the name and DEA number of Dr. I.L.

28. **Prescription No. 8:** On or about May 19, 2006, Respondent forged and dispensed prescription number 4458912 in the name of "Franco Mansour" for 60 10/3 tablets of Hydrocodone using the name and DEA number of Dr. I.L.

29. Between on or about March 9, 2006 and May 22, 2006, these eight (8) prescriptions were filled and paid for through the Community Prescription Center, Palm Springs'

cash register which provides bar code scanning and electronic signature capture for each transaction. The Community Prescription Center, Palm Springs cash register shows that on March 10, 2006 and March 17, 2006, a total of $1,670.16 was paid for five (5) of the above referenced prescriptions, and someone signed the name "Franco Mansour" on the electronic signature capture. On or about March 24, 2006, a sixth prescription for "Franco Mansour" was scanned out at the register along with 10 legitimate prescriptions for Respondent. Respondent paid for these prescriptions and signed the electronic signature pad. On or about April 27, 2006, Respondent paid for the seventh prescription for "Franco Mansour" using his own credit card. On or about May 22, 2006, Respondent paid for the eighth prescription for "Franco Mansour" using his own credit card.

30. On or about May 29, 2006, Respondent admitted that he had forged, dispensed and paid for the eight prescriptions to "Franco Mansour." Respondent stated that he obtained the drugs for a "friend."

PRAYER

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

1. Revoking or suspending Pharmacist Number RPH 37591, issued to Fred Lavern Goodman;

2. Ordering Fred Lavern Goodman 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;

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

DATED: 12/17/07

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