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8  
9 **BEFORE THE**  
**BOARD OF PHARMACY**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**  
11

12 In the Matter of the Accusation Against:  
13  
14 **MAUREEN KESHNI PRASAD**  
**5280 Mack Road, #241**  
**Sacramento, CA 95823**  
15 **Pharmacy Technician Registration No. TCH**  
**87120**  
16  
17 Respondent.

Case No. 4266

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

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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 November 14, 2008, the Board of Pharmacy issued Pharmacy Technician  
24 Registration Number TCH 87120 to Maureen Keshni Prasad (Respondent). The Pharmacy  
25 Technician Registration was in full force and effect at all times relevant to the charges brought  
26 herein and will expire on May 31, 2012, unless renewed.
- 27 //
- 28 //

JURISDICTION

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

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

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

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

10 "(1) Suspending judgment.

11 "(2) Placing him or her upon probation.

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

13 "(4) Revoking his or her license.

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

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

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

20 "(a) Gross immorality.

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

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

25 6. Section 125.3 of the Code states, in pertinent part, that the Board may request the  
26 administrative law judge to direct a licentiate found to have committed a violation or violations of  
27 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
28 enforcement of the case.

1           7. Section 118 of the Code states in pertinent part:

2           "(b) The suspension, expiration, or forfeiture by operation of law of a license issued by a  
3 board in the department, or its suspension, forfeiture, or cancellation by order of the board or by  
4 order of a court of law, or its surrender without the written consent of the board, shall not, during  
5 any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its  
6 authority to institute or continue a disciplinary proceeding against the licensee upon any ground  
7 provided by law or to enter an order suspending or revoking the license or otherwise taking  
8 disciplinary action against the licensee on any such ground.

9           "(c) As used in this section, 'board' includes an individual who is authorized by any  
10 provision of this code to issue, suspend, or revoke a license, and 'license' includes 'certificate,'  
11 'registration,' and 'permit.'"

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13                                   FIRST CAUSE FOR DISCIPLINE

14                                   (Unprofessional Conduct/Dishonest Acts)

15           8. Respondent is subject to disciplinary action under section 4301 (a) and ( f) in that on  
16 or about November 5, 2010 and December 15, 2010, while working as a cashier for Target  
17 located at 5001 Madison Avenue, Sacramento, California, Respondent removed cash from her  
18 register and placed it in her shoe. On December 15, 2010, in an interview with a store  
19 investigator, Respondent admitted that she took cash from registers over time which amounted to  
20 \$1,300.

21                                   PRAYER

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

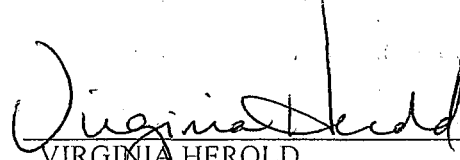
24           1. Revoking or suspending Pharmacy Technician Registration Number TCH 87120,  
25 issued to Maureen Keshni Prasad.;

26           2. Ordering Maureen Keshni Prasad to pay the Board of Pharmacy the reasonable costs  
27 of the investigation and enforcement of this case, pursuant to Business and Professions Code  
28 section 125.3;

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

DATED: 5/29/12



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

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