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

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

Case No. 4266

**DEFAULT DECISION AND ORDER**

[Gov. Code, §11520]

FINDINGS OF FACT

1. On or about May 29, 2012, Complainant Virginia Herold, in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs, filed Accusation No. 4266 against Maureen Keshni Prasad (Respondent) before the Board of Pharmacy. (Accusation attached as Exhibit A.)
2. On or about November 14, 2008, the Board of Pharmacy (Board) issued Pharmacy Technician Registration No. TCH 87120 to Respondent. The Pharmacy Technician Registration was in full force and effect at all times relevant to the charges brought in Accusation No. 4266 and will expire on May 31, 2012, unless renewed.

1           3.     Business and Professions Code section 118 (b) provides:

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

10           4.     On or about June 11, 2012, Respondent was served by Certified and First Class Mail  
11           copies of Accusation 4266, Statement to Respondent, Notice of Defense, Request for Discovery,  
12           and Discovery Statutes (Government Code sections 11507.5, 11507.6, and 11507.7) at  
13           Respondent's address of record which, pursuant to Business and Professions Code section 4100,  
14           is required to be reported and maintained with the Board. Respondent's address of record was  
15           and is:

16           5280 Mack Road, #241  
17           Sacramento, CA 95823.

18           5.     Service of the Accusation was effective as a matter of law under the provisions of  
19           Government Code section 11505, subdivision (c) and/or Business & Professions Code section  
20           124.

21           6.     On or about June 14, 2012, the green return receipt was initialed and returned. The  
22           documents sent via regular mail were not returned.

23           7.     Government Code section 11506 states, in pertinent part:

24                     (c) The respondent shall be entitled to a hearing on the merits if the respondent  
25                     files a notice of defense, and the notice shall be deemed a specific denial of all parts  
26                     of the accusation not expressly admitted. Failure to file a notice of defense shall  
27                     constitute a waiver of respondent's right to a hearing, but the agency in its discretion  
28                     may nevertheless grant a hearing.

          8.     Respondent failed to file a Notice of Defense within 15 days after service upon her of  
          the Accusation, and therefore waived her right to a hearing on the merits of Accusation No. 4266.

          9.     California Government Code section 11520 states, in pertinent part:

                   (a) If the respondent either fails to file a notice of defense or to appear at the  
                   hearing, the agency may take action based upon the respondent's express admissions  
                   or upon other evidence and affidavits may be used as evidence without any notice to  
                   respondent.



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ORDER

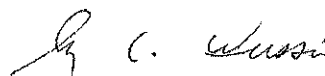
IT IS SO ORDERED that Pharmacy Technician Registration No. TCH 87120, heretofore issued to Respondent Maureen Keshni Prasad, is revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on October 15, 2012.

It is so ORDERED ON September 14, 2012

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA



By

\_\_\_\_\_  
STANLEY C. WEISSER  
Board President

10936109.DOC  
DOJ Matter ID:SA2012104855

Attachment:  
Exhibit A: Accusation

# Exhibit A

Accusation

1 KAMALA D. HARRIS  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 ELENA L. ALMANZO  
Deputy Attorney General  
4 State Bar No. 131058  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 322-5524  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:  
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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**

18  
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

1  
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.



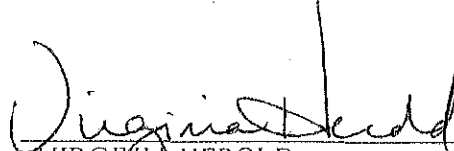


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3. Taking such other and further action as deemed necessary and proper.

DATED:

5/29/12



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

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