

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

In the Matter of the Statement of Issues Against:

Case No. 4170

HOSSEIN SHAMLOU

Pharmacy Technician Applicant

Respondent.

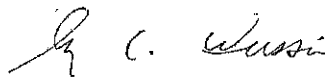
DECISION AND ORDER

The attached Proposed Decision of the Administrative Law Judge is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This decision shall become effective on December 28, 2012.

It is so ORDERED on November 28, 2012.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA



By

STANLEY C. WEISSER
Board President

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

In the Matter of the Statement of Issues
Against:

HOSSEIN SAFAVI SHAMLOU
4260 Don Way
San Diego, CA 92117

Respondent.

Case No. 4170

OAH No. 2012030075

PROPOSED DECISION

Administrative Law Judge Vallera J. Johnson, State of California, Office of Administrative Hearings, heard this matter in San Diego, California, on October 11, 2012.

Rita Lane, Deputy Attorney General, represented Complainant Virginia Herold, Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.

Hossein Safavi Shamlou represented himself.

The matter was submitted on October 23, 2012.¹

¹ The record remained open for Respondent to submit documentary evidence to establish that the conviction in Superior Court Case No. SCD175392 had been expunged. On October 18, 2012, Respondent filed a letter that stated that he learned that this conviction had not been expunged. He attached the Superior Court petition to expunge the conviction that he filed on October 18, 2012. The documents have been marked Exhibit C. The hearing on this Petition is set for November 21, 2012. Respondent requested a continuance until after November 21, 2012, in order to provide evidence that the conviction had been expunged.

On October 22, 2012, Complainant filed her response, marked Exhibit 9. Complainant objected to keeping the record open to allow Respondent to file his evidence of his expunged conviction in Superior Court Case No. SCD175392. Complainant argued that Respondent's documentary evidence was untimely and that the Administrative Law Judge ordered the record kept open for Respondent to establish that the conviction had been expunged prior to the hearing on October 11, 2012, not to give him time to request the

FACTUAL FINDINGS

1. On December 7, 2010, the Board of Pharmacy (Board) received an application for a Pharmacy Technician Registration from Hossein Safavi Shamlou (Respondent). On November 29, 2010, Respondent certified, under penalty of perjury, to the truthfulness of all statements, answers, and representations in the application. On June 7, 2011, the Board denied the application pursuant to Business and Professions Code sections 480, subdivision (a)(1) and (a)(3), based upon his criminal conviction. Respondent appealed this decision.

2. Virginia Herold (Complainant) filed Statement of Issues, Case No. 4170, dated December 13, 2011, in her official capacity as the Executive Officer of the Board.

Respondent filed a timely request for hearing.

3. On April 7, 2004, in the Superior Court of California, County of San Diego, in the case entitled *The People of the State of California vs. Hossein Shamlou*, Case No. SCD175392, on his plea of guilty, Respondent was convicted of violating Penal Code section 261.5, subdivision (c) (unlawful sexual intercourse with a minor more than three years younger).

4. The facts and circumstances underlying the conviction are that, between March 3, 2002 and March 2, 2003, Respondent unlawfully engaged in sexual intercourse with Haneh M., a minor, who was not his spouse, and who was more than three years younger than he was.

5. On April 7, 2004, in the Superior Court of California, County of San Diego, in the case entitled *The People of the State of California vs. Hossein Shamlou*, Case No. SCD180143, on his plea of guilty, Respondent was convicted of violating Penal Code section 1320, subdivision (b) (failure to appear on own recognizance).

6. The facts and circumstances underlying the conviction are that on October 30, 2003, Respondent was charged with the commission of three felonies, released from custody and willfully failed to appear in court as promised on the felony matters.

Superior Court to expunge this conviction. In addition, Complainant requested that the certified copy of the documents admitted as Exhibit 5 be substituted for the uncertified documents admitted as Exhibit 5.

Respondent's request for a continuance is denied. Complainant's request to substitute the certified documents is denied.

On October 23, 2012, the record was closed, and the matter was submitted.

7. As a consequence of the convictions (Findings 3 and 5), the Court placed Respondent on three years formal probation on terms and conditions that included, among other things,

- Committed to the custody of the sheriff for 180 days, with credit for 24 days (the Court allowed Respondent to complete custody time on work furlough); and
- Pay fines, fees and penalty assessment;

The sentence was to run concurrent in each case.

8. Pursuant to California Code of Regulations, title 16, section 1770, the crimes of which Respondent has been convicted (Findings 3, 4, 5, and 6) are substantially related to the qualifications, duties and functions of a pharmacy technician.

9. Between March 3, 2002 and March 2, 2003, Respondent committed acts involving moral turpitude when he unlawfully engaged in sexual intercourse with Haneh M., a minor, who was not his spouse, and who was more than three years younger than he was.

10. Complainant alleged that Respondent committed an act of dishonesty, fraud, and/or deceit when he willfully failed to appear in court as he promised on felony matters. Complainant established that Respondent violated Penal Code section 1320 subdivision (b) but no additional facts. A violation of Penal Code section 1320, subdivision (b), in and of itself, does not constitute an act of dishonesty, fraud, and/or deceit. Therefore it was not established that Respondent committed an act of dishonesty, fraud, and/or deceit when he violated Penal Code section 1320 subdivision (b).

11. Hamideh Shamlou, Respondent's mother, provided some explanation of the facts and circumstances underlying Respondent's conviction for sexual intercourse with a minor who was three years younger. She testified that they moved from Iran to the United States 23 years ago. In Iran, they have arranged marriages. Nevertheless, both Respondent and his mother understand that they are required to obey the laws in the United States. Respondent admitted that he had sexual intercourse with Haneh M. between March 2002 and March 2003. He testified that she told him that she was 19 years old; before March 2003, he learned that she was 17 years old when he saw her identification.

12. Respondent completed probation in his criminal cases, and his conviction has been expunged in San Diego Superior Court Case No. SCD180143.

13. Since his convictions, Respondent has maintained employment, has supported his five year-old son and has remained crime free.

LEGAL CONCLUSIONS

1. Pursuant to Business and Professions Code section 480, subdivision (a)(1), cause exists to deny Respondent's application for registration as a pharmacy technician in that Respondent has been convicted of crimes that are substantially related to the qualifications, duties or functions of a pharmacy technician, by reason of Findings 3, 4, 5, 6 and 8.

2. Cause does not exist to deny Respondent's application for registration as a pharmacy technician pursuant to Business and Professions Code section 480, subdivision (a)(2). It was not established that Respondent committed an act of dishonesty, fraud and/or deceit when he willfully failed to appear in court as promised on a felony matter, by reason of Findings 5, 6, 7 and 10.

3. Pursuant to Business and Professions Code section 480, subdivision (a)(3)(A), in that he committed acts that if done by a licensed pharmacy technician would be grounds for suspension or revocation of the license, by reason of Findings 3, 4, 5, 6, 8, 9 and 10.

4. The facts, the violations, the Board's criteria for rehabilitation set forth in California Code of Regulations, title 16, section 1769 and evidence of rehabilitation has been considered. It has been more than nine years since Respondent engaged in the criminal acts that resulted in Respondent's convictions. Respondent successfully completed probation in his criminal cases, and the conviction in Superior Court Case No. SCD180143 has been expunged. It would not be contrary to the public interest to issue Respondent a probationary license with appropriate terms and conditions at this time.

ORDER

Upon satisfaction of all statutory and regulatory requirements for pharmacy technician registration, the Pharmacy Board shall issue a pharmacy technician registration to Respondent Hossein S. Shamlou, and it shall be revoked immediately; the order of revocation shall be stayed, and Respondent Hossein S. Shamlou shall be placed on probation for two years upon the following terms and conditions.

1. **Obey All Laws.**

Respondent shall obey all State and Federal laws and regulations.

Respondent shall report any of the following events 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,

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

Failure to timely report any such occurrence shall be considered a violation of probation.

2. Report to the Board.

Respondent shall report to the Board, on a quarterly basis, on the schedule directed by the Board or its designee. The report shall be in person or in writing as the Board or its designee directs. Among other requirements, Respondent shall state in each report, under penalty of perjury, whether there has been compliance with all the terms and conditions of probation. Failure to submit timely reports in the form directed by the Board or its designee shall be considered a violation of probation. Any period(s) of delinquency in submission of reports as directed by the Board or its designee may be added to the period of probation. If the final probation report is not made as directed, probation shall be automatically extended until such time as the final report is made and accepted by the Board.

3. Interview with the Board.

Upon receipt of reasonable prior notice, Respondent shall appear in person for interviews with the Board or its designee, at such intervals and locations as determined by the Board or its designee. Failure to appear for any scheduled interview without prior notification to Board staff, or failure to appear at two (2) or more scheduled interviews with the Board or its designee during the period of probation, shall be considered a violation of probation.

4. Cooperate with Board Staff.

Respondent shall cooperate with the Board's inspection program and with the Board's monitoring and investigation of his compliance with the terms and conditions of his probation. Failure to cooperate shall be considered a violation of probation.

5. Notice to Employers.

During the period of probation, Respondent shall notify all present and prospective employers of the Decision in case number 4170 and the terms and conditions imposed on him by the Decision, as follows:

- Within 30 days of the effective date of this Decision, and within 15 days of Respondent undertaking new employment, he shall cause his direct

supervisor, pharmacist-in-charge (including each new pharmacist-in-charge employed during Respondent's tenure of employment) and owner to report to the Board, in writing, acknowledging that the individual(s) has/have read the Decision in case number 4170 and the terms and conditions imposed thereby. It shall be Respondent's responsibility to ensure that his employer(s) and/or supervisor(s) submit timely acknowledgement(s) to the Board.

- If Respondent works for or is employed by or through a pharmacy employment service, Respondent must notify his direct supervisor, pharmacist-in-charge and owner at every pharmacy of the terms and conditions of the Decision in case number 4170 in advance of Respondent commencing work at each pharmacy. A record of this notification must be provided to the Board upon request.
- Within 30 days of the effective date of this Decision, and within 15 days of Respondent undertaking new employment by or through a pharmacy employment service, Respondent shall cause his direct supervisor with the pharmacy employment service to report to the Board in writing acknowledging that he has read the Decision in case number 4170 and the terms and conditions imposed thereby. It shall be Respondent's responsibility to ensure that his employer(s) and/or supervisor(s) submit timely acknowledgment(s) to the Board.

Failure to timely notify present or prospective employer(s) or to cause that/those employer(s) to submit timely acknowledgements to the Board shall be considered a violation of probation.

Within the meaning of this provision, "Employment" shall include full-time, part-time, temporary or relief service or pharmacy management service as a pharmacy technician or in any position for which a pharmacy technician registration is a requirement or criterion for employment, whether Respondent is considered an employee, independent contractor or volunteer.

6. Work Site Monitor.

Within 10 days of the effective date of this Decision, Respondent shall identify a work site monitor, who must be approved by the Board. The work site monitor shall be responsible for supervising Respondent during working hours. Respondent shall be responsible for ensuring that the work site monitor reports, in writing, to the Board on a quarterly basis. Should the designated work site monitor determine, at any time during the probationary period, that Respondent has not maintained sobriety, he/she shall notify the Board immediately, either orally or in writing, as the Board or its designee directed. Should Respondent change employment, a new work site monitor must be designated and approved by the Board within 10 days of Respondent commencing new employment.

Failure to identify an acceptable initial or replacement work site monitor and failure to ensure that the work site monitor submits quarterly reports to the Board in a timely manner shall be constitute a violation of probation.

7. Notification of Departure.

Prior to leaving the probationary geographic area designated by the Board or its designee for a period greater than five days, Respondent shall notify the Board verbally and in writing of the dates of departure and return. Failure to comply with this provision shall be considered a violation of probation.

8. Probation Monitoring Costs.

Respondent shall pay any costs associated with probation monitoring as determined by the Board for each year of probation. Such costs shall be payable to the Board on a schedule directed by the Board or its designee. Failure to pay such costs in a timely manner shall be considered a violation of probation.

9. Status of License.

While on probation, Respondent shall maintain an active, current pharmacy technician license with the Board. Failure to do so shall be considered a violation of probation.

During the period of probation, if Respondent's pharmacy technician license expires or is cancelled 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.

10. License Surrender While Registration is on Probation/Suspension.

Following the effective date of this Decision, should Respondent cease work due to retirement or health or otherwise be unable to satisfy the terms and conditions of probation, Respondent may tender his pharmacy technician registration to the Board for surrender. The Board or its designee shall have the discretion whether to grant the request for surrender or to take other appropriate and reasonable action. Upon acceptance of the surrender of his license, Respondent will no longer be subject to the terms and conditions of probation. The surrender of his license shall constitute a record of discipline and shall become a part of the Respondent's license history with the Board.

Within 10 days of notification by the Board of its acceptance of Respondent's surrender of his license, Respondent shall relinquish his pharmacy technician license to the Board. Respondent may not re-apply for any license, permit, or registration from the Board for three (3) years from the effective date of the surrender. Respondent shall satisfy the requirements applicable to the license sought as of the date the application for that

license is submitted to the Board.

11. Notification of Change in Name, Residence Address, Mailing Address, or Employment.

Within 10 days of any change of employment, Respondent shall notify the Board in writing. Said notification shall include the reasons for leaving, the address of the new employer, the name of the supervisor and owner, and his work schedule, if known. Further, Respondent shall notify the Board, in writing, within 10 days, of a change in name, residence address and mailing address or telephone number.

Failure to timely notify the Board of any change in employer, name, address, or telephone number shall be considered a violation of probation.

12. Tolling of Probation.

Except during any period of suspension, at all times while on probation, Respondent shall maintain employment as a pharmacy technician in the State of California for a minimum of eighty (80) hours per calendar month. Any month during which this minimum is not met shall toll the probationary period, i.e., the period of probation shall be extended by one month for each month during which this minimum is not met. During any period of tolling probation, Respondent must comply with all terms and conditions of probation.

Should Respondent cease working as a pharmacy technician for a minimum of 80 hours per calendar month in California, Respondent must notify the Board, in writing, within 10 days of cessation of work and must notify the Board in writing, within 10 days, of the resumption of employment. Any failure to provide such notification(s) shall be considered a violation of probation.

It shall be a violation of probation for Respondent's probationary period to remain tolled for more than 36 months.

"Cessation of work" means a calendar month during which Respondent does not work for a minimum of 80 hours as a pharmacy technician (as defined in Business and Professions Code section 4115). "Resumption of work" means any calendar month during which Respondent works as a pharmacy technician for a minimum of 80 hours as a pharmacy technician (as defined by Business and Professions Code section 4115).

13. Violation of Probation.

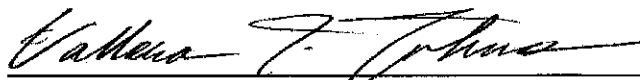
If Respondent violates the conditions of his probation, after giving notice and an opportunity to be heard, the Board may set aside the order and impose the stayed discipline of Respondent's license. During probation, if an Accusation or Petition to Revoke Probation is filed against Respondent's license or the Attorney General's Office has been requested to

prepare an Accusation or Petition to Revoke Probation against Respondent's license, the probationary period shall automatically be extended and shall not expire until the Accusation or Petition to Revoke Probation has been resolved by a Board Decision.

14. Completion of Probation.

Upon written notice by the Board indicating successful completion of probation, Respondent's pharmacy technician license shall be fully restored.

DATED: November 5, 2012



VALLERA J. JOHNSON
Administrative Law Judge
Office of Administrative Hearings

1 KAMALA D. HARRIS
Attorney General of California
2 LINDA K. SCHNEIDER
Supervising Deputy Attorney General
3 State Bar No. 101336
AMANDA DODDS
4 Senior Legal Analyst
110 West "A" Street, Suite 1100
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 645-2141
7 Facsimile: (619) 645-2061
Attorneys for Complainant

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

11
12 In the Matter of the Statement of Issues Against: Case No. 4170
13 **HOSSEIN SAFAVI SHAMLOU** **STATEMENT OF ISSUES**
14 **4260 Don Way**
San Diego, CA 92117
15 Respondent.

16 Complainant alleges:

17 **PARTIES**

- 18 1. Virginia Herold (Complainant) brings this Statement of Issues solely in her official
19 capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.
20 2. On or about December 7, 2010, the Board of Pharmacy, Department of Consumer
21 Affairs received an application for a Pharmacy Technician Registration from Hossein Safavi
22 Shamlou (Respondent). On or about November 29, 2010, Hossein Safavi Shamlou certified
23 under penalty of perjury to the truthfulness of all statements, answers, and representations in the
24 application. The Board denied the application on June 7, 2011.

25 **JURISDICTION**

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- (a) Considering the denial of a license by the board under Section 480; or
- (b) Considering suspension or revocation of a license under Section 490.

Each board shall take into account all competent evidence of rehabilitation furnished by the applicant or licensee.

8. Section 493 of the Code states:

Notwithstanding any other provision of law, in a proceeding conducted by a board within the department pursuant to law to deny an application for a license or to suspend or revoke a license or otherwise take disciplinary action against a person who holds a license, upon the ground that the applicant or the licensee has been convicted of a crime substantially related to the qualifications, functions, and duties of the licensee in question, the record of conviction of the crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact, and the board may inquire into the circumstances surrounding the commission of the crime in order to fix the degree of discipline or to determine if the conviction is substantially related to the qualifications, functions, and duties of the licensee in question.

As used in this section, "license" includes "certificate," "permit," "authority," and "registration."

9. Section 4301 of the Code states:

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:

....

(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.

....

(l) The conviction of a crime substantially related to the qualifications, functions, and duties of a licensee under this chapter. The record of conviction of a violation of Chapter 13 (commencing with Section 801) of Title 21 of the United States Code regulating controlled substances or of a violation of the statutes of this state regulating controlled substances or dangerous drugs shall be conclusive evidence of unprofessional conduct. In all other cases, the record of conviction shall be conclusive evidence only of the fact that the conviction occurred. The board may inquire into the circumstances surrounding the commission of the crime, in order to fix the degree of discipline or, in the case of a conviction not involving controlled substances or dangerous drugs, to determine if the conviction is of an offense substantially related to the qualifications, functions, and duties of a licensee under this chapter. A plea or verdict of guilty or a conviction following a plea of nolo contendere is deemed to be a conviction within the meaning of this provision. The board may take action when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal or when an order granting probation is made

1 suspending the imposition of sentence, irrespective of a subsequent order under
2 Section 1203.4 of the Penal Code allowing the person to withdraw his or her plea of
3 guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or
4 dismissing the accusation, information, or indictment.

5 **REGULATORY PROVISIONS**

6 10. California Code of Regulations, title 16, section 1769 states:

7 (a) When considering the denial of a facility or personal license under Section
8 480 of the Business and Professions Code, the board, in evaluating the rehabilitation
9 of the applicant and his present eligibility for licensing or registration, will consider
10 the following criteria:

11 (1) The nature and severity of the act(s) or offense(s) under consideration as
12 grounds for denial.

13 (2) Evidence of any act(s) committed subsequent to the act(s) or crime(s) under
14 consideration as grounds for denial under Section 480 of the Business and Professions
15 Code.

16 (3) The time that has elapsed since commission of the act(s) or crime(s) referred
17 to in subdivision (1) or (2).

18 (4) Whether the applicant has complied with any terms of parole, probation,
19 restitution or any other sanctions lawfully imposed against the applicant.

20 (5) Evidence, if any, of rehabilitation submitted by the applicant.

21
22 11. California Code of Regulations, title 16, section 1770 states:

23 For the purpose of denial, suspension, or revocation of a personal or facility
24 license pursuant to Division 1.5 (commencing with Section 475) of the Business and
25 Professions Code, a crime or act shall be considered substantially related to the
26 qualifications, functions or duties of a licensee or registrant if to a substantial degree
27 it evidences present or potential unfitness of a licensee or registrant to perform the
28 functions authorized by his license or registration in a manner consistent with the
public health, safety, or welfare.

FIRST CAUSE FOR DENIAL OF APPLICATION

(April 7, 2004 Criminal Conviction for Unlawful Sex With a Minor)

12. Respondent's application for registration as a pharmacy technician is subject to denial
under section 480, subdivision (a)(1) of the Code in that Respondent was convicted of a crime
that is substantially related to the qualifications, duties, and functions of a pharmacy technician.

The circumstances are as follows:

1 a. On or about April 7, 2004, in a criminal proceeding entitled *State of California*
2 *v. Hossein Shamlou*, in San Diego County Superior Court, case number CD175392, Respondent
3 was convicted on his plea of guilty to violating Penal Code section 261.5, subdivision (c),
4 unlawful sexual intercourse with a minor more than 3 years younger, a felony. The court
5 dismissed an additional count of violating Penal Code section 261.5, subdivision (c), as well as a
6 violation of Penal Code section 261.5, subdivision (d), unlawful sexual intercourse with a minor
7 under 16 years of age, pursuant to a plea agreement.

8 b. As a result of the conviction, on or about April 7, 2004, Respondent was
9 sentenced to three years formal probation, and ordered to serve 180 days in jail, with credit for 24
10 days, to be served on a work furlough program, and payment of fines, fees, and restitution.

11 c. The facts and circumstances that led to the conviction are that on or about and
12 between March 3, 2001 and April 4, 2003, Respondent, who was over the age of 21 years old,
13 engaged in sexual intercourse with a minor, not his wife, who was under the age of 16 years old.

14 **SECOND CAUSE FOR DENIAL OF APPLICATION**

15 **(March 9, 2004 Criminal Conviction for Failure to Appear on October 30, 2003)**

16 13. Respondent's application for registration as a pharmacy technician is subject to denial
17 under section 480, subdivision (a)(1) of the Code in that Respondent was convicted of a crime
18 that is substantially related to the qualifications, duties, and functions of a pharmacy technician.
19 The circumstances are as follows:

20 a. On or about March 9, 2004, in a criminal proceeding entitled *State of California*
21 *v. Hossein Shamlou*, in San Diego County Superior Court, case number SCD180143, Respondent
22 was convicted on his plea of guilty to violating Penal Code section 1320, subdivision (b), failure
23 to appear on his own recognizance, a felony.

24 b. As a result of the conviction, on or about April 7, 2004, Respondent was
25 sentenced to three years formal probation, and ordered to serve 180 days in jail, with credit for 24
26 days, and payment of fines, fees, and restitution. The sentence was ordered to run concurrent
27 with the sentence imposed in case number CD175392, detailed in paragraph 12, above. On
28 October 10, 2010, the court granted Respondent's petition for relief and dismissed the conviction.

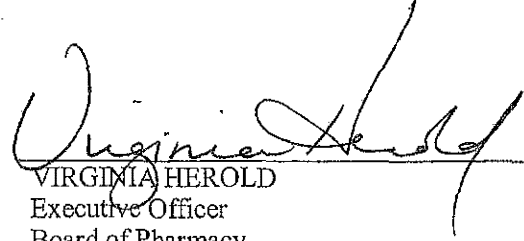
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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. Denying the application of Hossein Safavi Shamlou for a Pharmacy Technician Registration;
2. Taking such other and further action as deemed necessary and proper.

DATED: 12/6/11



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

SD2011801060