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

12 In the Matter of the Accusation Against:

13 **MUNPREET SINGH**
14 **1843 Pebble Beach Drive**
Yuba City, CA 95993

15 **Intern Pharmacist Registration No. INT**
16 **43866**

17 Respondent.

Case No. 7251

OAH No. 2022070149

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

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19 **FINDINGS OF FACT**

20 1. On or about May 12, 2022, Complainant Anne Sodergren, in her official capacity as
21 the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs, filed
22 Accusation No. 7251 against Munpreet Singh (Respondent) before the Board of Pharmacy
23 (Board). (Accusation attached as Exhibit A.)

24 2. On or about October 26, 2018, the Board issued Intern Pharmacist Registration No.
25 INT 43866 to Respondent. The Intern Pharmacist Registration was in full force and effect at all
26 times relevant to the charges brought in Accusation No. 7251 and will expire on May 31, 2023,
27 unless renewed.

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1 3. On or about May 26, 2022, Respondent was served with Accusation No. 7251 at his
2 address of record which was and is:

3 555 Gidda Loop

4 Yuba City, CA 95993.

5 4. On or about May 31, 2022, Respondent signed and returned a Notice of Defense,
6 requesting a hearing in this matter. The Notice of Defense listed Respondent's mailing address
7 as:

8 1843 Pebble Beach Drive

9 Yuba City, CA 95993.

10 5. On, July 18, 2022, a Notice of Hearing was served by mail at the address provided by
11 Respondent in the Notice of Defense which was and is:

12 1843 Pebble Beach Drive

13 Yuba City, CA 95993.

14 The Notice of Hearing informed him that an administrative hearing in this matter was scheduled
15 for November 22, 2022.

16 6. Service of the Accusation was effective as a matter of law under the provisions of
17 Government Code section 11505(c) and/or Business and Professions Code section 124.

18 7. The matter was called for hearing at the date, time and location set forth in the Notice
19 of Hearing. The assigned Administrative Law Judge found that the service of the Notice of
20 Hearing on Respondent was proper. There was no appearance by or on behalf of Respondent. A
21 default was declared and on motion of counsel for Complainant, the matter was remanded to the
22 Board under Government Code section 11520.

23 8. Government Code section 11506(c) 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
26 parts of the accusation . . . not expressly admitted. Failure to file a notice of defense
27 . . . shall constitute a waiver of respondent's right to a hearing, but the agency in its
28 discretion may nevertheless grant a hearing.

29 9. California Government Code section 11520(a) states, in pertinent part:

30 (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

10. Pursuant to its authority under Government Code section 11520, the Board finds Respondent is in default. The Board will take action without further hearing and, based on the relevant evidence contained in the Default Decision Investigatory Evidence Packet in this matter, finds that the charges and allegations in Accusation No. 7251, are separately and severally, found to be true and correct by clear and convincing evidence.

11. The Board finds that the actual costs for Investigation and Enforcement are \$9,173.75.

DETERMINATION OF ISSUES

1. Based on the foregoing findings of fact, Respondent Munpreet Singh has subjected his Intern Pharmacist Registration No. INT 43866 to discipline.

2. The agency has jurisdiction to adjudicate this case by default.

3. The Board of Pharmacy is authorized to revoke Respondent's Intern Pharmacist Registration based upon the following violations alleged in the Accusation which are supported by the evidence contained in the Default Decision Investigatory Evidence Packet in this case:

a. Respondent violated Business and Professions Code (Code) sections 4301, subdivision (1), and 490 on the grounds of unprofessional conduct, in that he was convicted of the following crimes substantially related to the qualification, functions, and duties of a pharmacist intern:

i. On or about June 11, 2021, in the criminal proceeding entitled *People v. Munpreet Singh*, Sutter County Superior Court case number CRTR20-0000344, Respondent was convicted on his plea of no contest to violating Vehicle Code section 23152, subdivision (b) (driving with a blood alcohol content of 0.08 percent or higher), a misdemeanor. He remains on criminal probation through June 2024. The circumstances of this conviction are that on or about January 12, 2020, a Yuba City police officer initiated a traffic enforcement stop on a vehicle with an obscured rear license plate that remained stopped after the light turned green at an intersection on

1 Plumas Street in Yuba City. Respondent was identified as the driver, and he failed a series of
2 Field Sobriety Tests. His blood alcohol content was 0.11 percent and 0.11 percent.

3 ii. On or about June 11, 2021, in the criminal proceeding entitled *People v. Munpreet*
4 *Singh*, Sutter County Superior Court case number CRF20-00000731, Respondent was convicted
5 on his plea of no contest to violating Penal Code section 422, subdivision (a) (threats to commit a
6 crime resulting in death or great bodily injury), a misdemeanor. The circumstances of this
7 conviction are that on or about March 13, 2020, several Sutter County Sheriff's deputies were
8 dispatched to Respondent's residence in response to a female calling for help who stated that
9 someone was trying to kill her father. Deputy C observed two people on the floor of the laundry
10 room, one of whom was identified as Respondent, and a third person who appeared to be trying to
11 kick them. Respondent was detained for questioning and acted increasingly aggressive, included
12 making the statement "F___ you. I am getting a law degree" to Deputy C. Respondent's father
13 reported to Deputy C that he and Respondent argued about Respondent's alcohol consumption,
14 the argument became physical, and Respondent shoved his father to the ground, grabbed him by
15 the throat, and hit him multiple times in the face. Respondent also allegedly said to his father
16 "you'll be dead by the time help arrives." Deputy C observed several injuries on Respondent's
17 father, including multiple small abrasions to his right and left cheek, and a small laceration to the
18 scalp behind the right ear.

19 iii. On or about June 11, 2021, in the criminal proceeding entitled *People v. Munpreet*
20 *Singh*, Sutter County Superior Court case number CRM20-0002539, Respondent was convicted
21 on his plea of no contest to violating Penal Code section 148, subdivision (a)(1) (resisting arrest),
22 a misdemeanor. The circumstances of the conviction are that on or about September 30, 2020,
23 Sutter County Sheriff's Deputies ZA and MA observed a vehicle later identified as Respondent's
24 speeding and weaving in traffic in a school zone. Respondent refused to exit his vehicle, and
25 when the deputies finally removed him, he actively resisted by stiffening his arms and pulling his
26 body away from the deputies. A subsequent records check revealed that Respondent had three
27 suspensions on his driver's license for excessive blood alcohol content, and failure to appear in
28

1 court. Respondent was issued a citation for reckless driving, resisting arrest, and driving with a
2 suspended license. Deputy ZA observed Respondent take the citation and tear it into pieces.

3 iv. On or about June 11, 2021, in the criminal proceeding entitled *People v. Munpreet*
4 *Singh*, Sutter County Superior Court case number CRM21-0000010, Respondent was convicted
5 on his plea of no contest to violating Penal Code section 148, subdivision (a)(1) (resisting arrest),
6 a misdemeanor. The circumstances of the conviction are that on or about December 10, 2020,
7 Sutter County Sheriff's Deputies R and P were dispatched to investigate a report of a male
8 destroying property inside a residence. When the deputies entered the house, Respondent yelled
9 "get the f___ out of my house." Deputy R saw broken glass and several broken pieces of
10 furniture, and when he attempted to ask Respondent what was happening, Respondent put his
11 hands inside his pockets as if to get something, and yelled "f___ you!" Respondent resisted arrest
12 and appeared to be under the influence of a stimulant. Deputy R asked Respondent if he would
13 provide a urine sample at the jail and he said "f___ you, I'm not doing anything."

14 v. On or about July 12, 2021, in the criminal proceeding entitled *People v. Munpreet*
15 *Singh*, Sutter County Superior Court case number CRF21-0000305, Respondent was convicted on
16 his plea of no contest to violating Penal Code section 422, subdivision (a) (threats to commit
17 crime resulting in death or great bodily injury), a felony. He remains on formal probation until
18 July 2023. The circumstances of the conviction are that on or about February 10, 2021, Sutter
19 County Sheriff's Deputy F was dispatched to a residence in Yuba City to investigate a male
20 acting erratically and causing damage to a vehicle. Upon arrival, Deputy F saw two Yuba City
21 police officers speaking to the male, identified as Respondent. One of the police officers said
22 Respondent was not cooperating and had been on top of the vehicle screaming at them. Deputy F
23 tried to talk to Respondent and de-escalate the situation. Respondent said his brother stole his
24 vehicle and he wanted it back. Deputy F was unable to locate Respondent's brother or his
25 vehicle, which Respondent later said was towed. Respondent repeatedly said he wanted to fight
26 his brother, to which Deputy F told Respondent he could possible go to jail if his brother pressed
27 charges. Respondent told Deputy F "I don't have any issues with you because you're six feet tall
28 and I can put you under. I come from a religion where it's easy to put someone under." Deputy F

1 believed Respondent's comments to be a threat, and placed him in the patrol vehicle while the
2 deputy spoke to the original reporting party. The reporting party said the Respondent arrived at
3 her residence screaming and yelling at her, and began to hit her vehicle. Deputy F noted both
4 windshield wipers and the wiper assembly were broken and estimated Respondent caused
5 approximately \$300-\$500 damage to the vehicle. When Deputy F returned to his patrol vehicle to
6 question Respondent, Respondent said he did not like Deputy F because he was "a copy," and
7 told Deputy F that [Respondent] was going to kill him if [Respondent] got out of handcuffs and
8 that [Respondent] would "beat [his] ass" until Deputy F was dead, therefore Respondent was
9 arrested. During booking when Respondent's handcuffs were removed, he pointed his fingers
10 toward Deputy F in the form of a gun.

11 b. Respondent violated Code section 4301, subdivision (f) on the grounds of
12 unprofessional conduct, in that Respondent committed acts involving moral turpitude, dishonesty,
13 fraud, deceit, or corruption, as more particularly set forth above in paragraph a., subparagraphs i.
14 through v.

15 c. Respondent violated Code section 4301, subdivision (h) on the grounds of
16 unprofessional conduct, in that he used alcohol to an extent or in a manner dangerous or injurious
17 to himself, any other person, or the public as more particularly set for above in paragraph a.,
18 subparagraph i.

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ORDER

IT IS SO ORDERED that Intern Pharmacist Registration No. INT 43866, issued to Respondent Munpreet Singh, 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 at 5:00 p.m. on February 8, 2023.

It is so ORDERED on January 9, 2023.



Seung W. Oh, Pharm.D.
Board President
FOR THE BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS

36731411.DOCX
DOJ Matter ID:SA2022300731

Attachment:
Exhibit A: Accusation

Exhibit A

Accusation

(MUNPREET SINGH)

1 ROB BONTA
Attorney General of California
2 DAVID E. BRICE
Supervising Deputy Attorney General
3 PATRICIA WEBBER HEIM
Deputy Attorney General
4 State Bar No. 230889
1300 I Street, Suite 125
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7 E-mail: Patricia.Heim@doj.ca.gov
Attorneys for Complainant
8

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

13 In the Matter of the Accusation Against:

Case No. 7251

14 **MUNPREET SINGH**
15 **555 Gidda Loop**
Yuba City, CA 95993

ACCUSATION

16 **Intern Pharmacist Registration No. INT**
17 **43866**

Respondent.

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20 **PARTIES**

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

23 2. On or about October 26, 2018, the Board issued Intern Pharmacist Registration
24 Number INT 43866 to Munpreet Singh (Respondent). The Intern Pharmacist Registration was in
25 full force and effect at all times relevant to the charges brought herein and will expire on
26 December 31, 2022, unless renewed.

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JURISDICTION

3. This Accusation is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code (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. . . .

5. Section 4300.1 of the Code states, in pertinent part:

The expiration, cancellation, forfeiture, or suspension of a board-issued license by operation of law or by order or decision of the board or a court of law, the placement of a license on a retired status, or the voluntary surrender of a license by a licensee shall not deprive the board of jurisdiction to commence or proceed with any investigation of, or action or disciplinary proceeding against, the licensee or to render a decision suspending or revoking the license.

STATUTORY PROVISIONS

6. 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 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.

. . . .

(h) The administering to oneself, of any controlled substance, or the use of any

dangerous drug or of alcoholic beverages to the extent or in a manner as to be dangerous or injurious to oneself, to a person holding a license under this chapter, or to any other person or to the public, or to the extent that the use impairs the ability of the person to conduct with safety to the public the practice authorized by the license.

....

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

....

7. Section 490 of the Code states:

(a) In addition to any other action that a board is permitted to take against a licensee, a board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued.

(b) Notwithstanding any other provision of law, a board may exercise any authority to discipline a licensee for conviction of a crime that is independent of the authority granted under subdivision (a) only if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the licensee's license was issued.

(c) A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action that a board is permitted to take following the establishment of a conviction may be taken 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 suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code.

(d) The Legislature hereby finds and declares that the application of this section has been made unclear by the holding in *Petropoulos v. Department of Real Estate* (2006) 142 Cal.App.4th 554, and that the holding in that case has placed a significant number of statutes and regulations in question, resulting in potential harm to the consumers of California from licensees who have been convicted of crimes. Therefore, the Legislature finds and declares that this section establishes an

independent basis for a board to impose discipline on a licenses, and that the amendments to this section made by Chapter 33 of the Statutes of 2008 do not constitute a change to, but rather are declaratory of, existing law.

COST RECOVERY

8. Code section 125.3 states, in pertinent part, that the Board may request the administrative law judge to direct a licensee 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.

FACTUAL ALLEGATIONS

January 12, 2020, Incident

9. On or about January 12, 2020, a Yuba City police officer initiated a traffic enforcement stop on a vehicle with an obscured rear license plate that remained stopped after the light turned green at an intersection on Plumas Street in Yuba City. The officer identified the driver of the vehicle as Respondent, who displayed signs of alcohol impairment. Respondent told the officer he last had alcohol two days previously. While Respondent remained seated in the vehicle, the officer asked him a series of driving under the influence (DUI) investigation questions, and later performed a series of Field Sobriety Tests, which Respondent failed. The officer arrested Respondent. Respondent agreed to take a chemical breath test, and his blood alcohol content (BAC) was .11% BAC and .11% BAC respectively.

10. On or about February 26, 2020, a Board inspector contacted Respondent regarding his DUI arrest on January 12, 2020. Respondent said he was on academic leave and not currently working as a pharmacist intern. At the time of his arrest, Respondent did not feel intoxicated and felt the police officer was “picking on him.” Respondent admitted he drank two beers prior to his contact with the police. Respondent said he drank alcohol about three times a week, and the officer caught him on a “bad day.” The Board’s investigator provided Respondent with information about the Pharmacist Recovery Program. Respondent said he would consider calling the program.

11. On or about June 11, 2021, in the criminal proceeding entitled *People v. Munpreet Singh* (Sutter County Superior Court Case CRTR20-0000344), Respondent was convicted by the

1 court on his plea of no contest to violating Vehicle Code section 23152, subdivision (b) (driving
2 with a BAC of .08% or higher), a misdemeanor. As a result of his conviction, Respondent was
3 sentenced to three years' probation, and ordered to serve 48 hours in jail, enroll in and complete a
4 three-month DUI program, and pay all fines and fees.

5 **March 13, 2020, Incident**

6 12. On or about March 13, 2020, several Sutter County Sheriff's deputies were
7 dispatched to Respondent's residence in response to a female calling for help who stated someone
8 was trying to kill her father. Deputy C observed two people on the floor of the laundry room, one
9 of whom was identified as Respondent, and a third person who appeared to be trying to kick
10 them. Respondent was detained for questioning and acted increasingly aggressive. When Deputy
11 C attempted to question Respondent, he responded with "Fuck you. I am getting a law degree."
12 Respondent was yelling at family members and tried to get up from the couch, where he was
13 being detained for questioning. Through a translator, Respondent's father told Deputy C that he
14 and Respondent argued about Respondent's alcohol consumption throughout the day. The
15 argument became physical when Respondent shoved his father to the ground, grabbed him by the
16 throat and hit him multiple times in the face. Respondent allegedly said to his father "you'll be
17 dead by the time help arrives." Deputy C observed several injuries on Respondent's father,
18 including multiple small abrasions to his right and left cheek, and a small laceration to the scalp
19 behind the right ear. Deputy L spoke with Respondent's brother who said his father and
20 Respondent were fighting about Respondent's alcohol and drug use. The brother confirmed that
21 Respondent choked their father and threatened to kill him. Respondent refused to provide a
22 statement and was arrested.

23 13. On or about June 11, 2021, in the criminal proceeding entitled *People v. Munpreet*
24 *Singh* (Sutter County Superior Court Case CRF20-0000731), Respondent was convicted on his
25 plea of no contest to violating Penal Code section 422, subdivision (a) (Threat(s) to Commit
26 Crime Resulting in Death or Great Bodily Injury), a misdemeanor. As a result of his conviction,
27 Respondent was sentenced to one year summary probation, ordered to serve 76 days in jail, and
28 pay all fines and fees.

1 **September 30, 2020 Incident**

2 14. On or about September 30, 2020, Sutter County Sheriff's Deputies ZA and MA
3 initiated a traffic enforcement stop while on routine patrol. The Deputies observed a vehicle later
4 identified as Respondent's, speeding and weaving in traffic in a school zone. Respondent refused
5 to exit his vehicle, and when the deputies finally removed him, he actively resisted by stiffening
6 his arms and pulling his body away from the deputies. A subsequent records check revealed that
7 Respondent had three suspensions on his driver's license for excessive BAC, and failure to appear
8 in court. Deputy ZA issued a citation to Respondent for reckless driving, resisting arrest, and
9 driving with a suspended license, and told him to appear in court. Deputy ZA observed
10 Respondent take the citation and tear it into pieces.

11 15. On or about June 11, 2021, in the criminal proceeding entitled *People v. Munpreet*
12 *Singh* (Sutter County Superior Court Case CRM20-0002539), Respondent was convicted on his
13 plea of no contest to violating Penal Code section 148, subdivision (a)(1) (Resisting Arrest), a
14 misdemeanor. As a result of his conviction, Respondent was sentenced to one day in jail, and
15 ordered to pay all fines and fees.

16 **December 10, 2020, Incident**

17 16. On or about December 10, 2020, Sutter County Sheriff's Deputies R and P were
18 dispatched to investigate a report of a male destroying property inside a residence. When the
19 deputies entered the house, Respondent yelled "get the fuck out of my house." Deputy R saw
20 broken glass and several broken pieces of furniture, and when he attempted to ask Respondent
21 what was happening, Respondent put his hands inside his pockets as if to get something, and
22 yelled "fuck you!" Respondent resisted arrest, and appeared to be under the influence of a
23 stimulant. Deputy R asked Respondent if he would provide a urine sample at the jail and he said
24 "fuck you, I'm not doing anything."

25 17. On or about June 11, 2021, in the criminal proceeding entitled *People v. Munpreet*
26 *Singh* (Sutter County Superior Court Case CRM21-0000010), Respondent was convicted on his
27 no contest plea of violating Penal Code section 148, subdivision (a)(1) (Resisting Arrest), a
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1 misdemeanor. As a result of his conviction, Respondent was sentenced to four days in jail, and
2 ordered to pay all fines and fees.

3 **February 10, 2021, Incident**

4 18. On or about February 10, 2021, Deputy F was dispatched to a residence in Yuba City
5 to investigate a male acting erratically and causing damage to a vehicle. Upon arrival, Deputy F
6 saw two Yuba City police officers speaking with the male, identified as Respondent. One of the
7 police officers said Respondent was not cooperating and had been on top of the vehicle screaming
8 at them. Deputy F tried to talk to Respondent and de-escalate the situation. Respondent said his
9 brother stole his vehicle and he wanted it back. Deputy F was unable to locate Respondent's
10 brother or his vehicle, which Respondent later said was towed. Respondent repeatedly said he
11 wanted to fight with his brother. Deputy F told Respondent that he would possibly go to jail if his
12 brother pressed charges. Respondent told Deputy F "I don't have any issues with you because
13 you're six feet tall and I can put you under. I come from a religion where it's easy to put
14 someone under." Deputy F believed Respondent's comments to be a threat, and placed
15 Respondent in his patrol vehicle while he spoke to the original reporting party. She reported that
16 Respondent arrived at her residence screaming and yelling at her, and began to hit her vehicle.
17 Deputy F noted both windshield wipers and the wiper assembly were broken, and estimated that
18 Respondent had caused approximately \$300-\$350 damage to the vehicle. When Deputy F
19 returned to his patrol vehicle to question Respondent, Respondent said he did not like Deputy F
20 because he was "a cop," and told Deputy F that [Respondent] was going to kill him if
21 [Respondent] got out of handcuffs and that [Respondent] would "beat [his] ass" until Deputy F
22 was dead, therefore Respondent was arrested. During booking when Respondent's handcuffs
23 were removed, he pointed his fingers toward Deputy F in the form of a gun.

24 19. On or about July 12, 2021, in the criminal proceeding entitled *People v. Munpreet*
25 *Singh* (Sutter County Superior Court Case CRF21-0000305), Respondent was convicted on his no
26 contest plea of violating Penal Code section 422, subdivision (a) (Threat(s) to Commit Crime
27 Resulting in Death or Great Bodily Injury), a felony. As a result of his conviction, Respondent
28

1 was sentenced to two years formal probation, ordered to serve 225 days in jail, and pay all fines
2 and fees.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Conviction of a Crime)**

5 20. Respondent is subject to disciplinary action under Code sections 4301, subdivision
6 (l), and 490 on the grounds of unprofessional conduct, in that he was convicted of crimes
7 substantially related to the qualifications, functions, and duties of a pharmacist intern, as more
8 particularly set forth in paragraphs 11, 13, 15, 17, and 19.

9 **SECOND CAUSE FOR DISCIPLINE**

10 **(Dangerous Use of Drugs or Alcohol)**

11 21. Respondent is subject to disciplinary action under Code section 4301, subdivision (h),
12 on the grounds of unprofessional conduct, in that he used alcohol to an extent or in a manner
13 dangerous or injurious to himself, any other person, or the public, as more particularly set forth
14 above in paragraph 9.

15 **THIRD CAUSE FOR DISCIPLINE**

16 **(Commission of Any Act Involving Moral Turpitude,
17 Dishonesty, Fraud, Deceit or Corruption)**

18 22. Respondent is subject to disciplinary action under Code section 4301, subdivision (f),
19 on the grounds of unprofessional conduct, in that he committed acts involving moral turpitude,
20 dishonesty, fraud, deceit, or corruption, as more particularly set forth above in paragraphs 9, 12,
21 14, 16, and 18.

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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 Intern Pharmacist Registration Number INT 43866, issued to Munpreet Singh;

2. Ordering Munpreet Singh 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; and,

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

DATED: 5/12/2022

Signature on File

ANNE SODERGREN
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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