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

In the Matter of the Accusation Against:

MANSOUR PARTNERS, INC, DBA BEST BUY DRUGS, YOUSEF MANSOUR, PAUL MANSOUR

Pharmacy Permit No. PHY 55583

and

PAUL MANSOUR

Pharmacist License No. RPH 44325

Respondents

Agency Case No. 7573

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Board

of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective at 5:00 p.m. on February 1, 2024.

It is so ORDERED on January 2, 2024.

BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

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Ву

Seung W. Oh, Pharm.D. Board President

1	ROB BONTA	
2	Attorney General of California ARMANDO ZAMBRANO	
3	Supervising Deputy Attorney General THOMAS L. RINALDI	
4	Supervising Deputy Attorney General State Bar No. 206911	
5	300 So. Spring Street, Suite 1702 Los Angeles, CA 90013	
6	Telephone: (213) 269-6310 Facsimile: (916) 731-2126	
7	Attorneys for Complainant	
8	BEFO	RE THE
9	BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS	
10		CALIFORNIA
11		
12	In the Matter of the Accusation Against:	Case No. 7573
13	MANSOUR PARTNERS, INC. DBA BEST BUY DRUGS,	STIPULATED SURRENDER OF LICENSE AND ORDER
14	YOUSEF MANSOUR, PAUL MANSOUR	
15	29 N. Baldwin Ave Sierra Madre, CA 91024	
16	Permit No. PHY 55583,	
17	and	
18	PAUL MANSOUR 220 S. Hermosa Ave	
19	Sierra Madre, CA 91024	
20	Pharmacist License No. RPH 44325	
21	Respondents	
22		
23		
24	IT IS HEREBY STIPULATED AND AG	REED by and between the parties to the above-
25	entitled proceedings that the following matters a	re true:
26	PAR	TIES
27	1. Anne Sodergren (Complainant) is th	e Executive Officer of the Board of Pharmacy
28	(Board). She brought this action solely in her of	ficial capacity and is represented in this matter by
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		Stipulated Surrender of License (Case No. 7573)

1	Rob Bonta, Attorney General of the State of California, by Thomas L. Rinaldi, Supervising
2	Deputy Attorney General.
3	2. Mansour Partners, Inc. dba Best Buy Drugs, Yousef Mansour, Paul Mansour
4	(Respondent Best Buy Drugs) is representing itself in this proceeding and has chosen not to
5	exercise its right to be represented by counsel.
6	3. Paul Mansour (Respondent Mansour) is representing himself in this proceeding and
7	has chosen not to exercise his right to be represented by counsel.
8	4. On or about February 24, 2017, the Board issued Permit No. PHY 55583 to
9	Respondent Best Buy Drugs, with Yousef Mansour designated as the Chief Executive Officer,
10	President, and 50% shareholder since February 24, 2017, and Paul Mansour designated as
11	President, 50% shareholder, Secretary, and Treasurer/Chief Financial Officer since February 24,
12	2017. The Permit was in full force and effect at all times relevant to the charges brought in
13	Accusation No. 7573 and will expire on February 1, 2024, unless renewed.
14	5. On or about August 5, 1991, the Board issued Pharmacist License Number RPH
15	44325 to Respondent Mansour. The Pharmacist License was in full force and effect at all times
16	relevant to the charges brought herein and will expire on December 31, 2024, unless renewed
17	JURISDICTION
18	6. Accusation No. 7573 was filed before the Board, and is currently pending against
19	Respondents. The Accusation and all other statutorily required documents were properly served
20	on Respondents on September 14, 2023. Respondents timely filed a Notice of Defense contesting
21	the Accusation. A copy of Accusation No. 7573 is attached as Exhibit A and incorporated by
22	reference.
23	ADVISEMENT AND WAIVERS
24	7. Respondents have carefully read, and understands the charges and allegations in
25	Accusation No. 7573. Respondents also have carefully read, and understands the effects of this
26	Stipulated Surrender of License and Order.
27	8. Respondent is fully aware of its legal rights in this matter, including the right to a
28	hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
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	Stipulated Surrender of License (Case No. 7573)

1	its own expense; the right to confront and cross-examine the witnesses against them; the right to
2	present evidence and to testify on its own behalf; the right to the issuance of subpoenas to compel
3	the attendance of witnesses and the production of documents; the right to reconsideration and
4	court review of an adverse decision; and all other rights accorded by the California
5	Administrative Procedure Act and other applicable laws.
6	9. Respondents voluntarily, knowingly, and intelligently waive and give up each and
7	every right set forth above.
8	<u>CULPABILITY</u>
9	10. Respondents admit the truth of each and every charge and allegation in Accusation
10	No. 7573, agree that cause exists for discipline and hereby surrenders their Permit No. PHY
11	55583 and Pharmacist License No. RPH 44325 for the Board's formal acceptance.
12	11. Respondents understand that by signing this stipulation they enable the Board to issue
13	an order accepting the surrender of Permit No. PHY 55583 and Pharmacist License No. RPH
14	44325 without further process.
15	<u>CONTINGENCY</u>
16	12. This stipulation shall be subject to approval by the Board. Respondents understand
17	and agree that counsel for Complainant and the staff of the Board may communicate directly with
18	the Board regarding this stipulation and surrender, without notice to or participation by
19	Respondents. By signing the stipulation, Respondents understand and agree that they may not
20	withdraw their agreement or seek to rescind the stipulation prior to the time the Board considers
21	and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the
22	Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this
23	paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not
24	be disqualified from further action by having considered this matter.
25	13. The parties understand and agree that Portable Document Format (PDF) and facsimile
26	copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures
27	thereto, shall have the same force and effect as the originals.
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1	14. This Stipulated Surrender of License and Order is intended by the parties to be an
2	integrated writing representing the complete, final, and exclusive embodiment of their agreement.
3	It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
4	negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
5	may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
6	executed by an authorized representative of each of the parties.
7	15. In consideration of the foregoing admissions and stipulations, the parties agree that
8	the Board may, without further notice or formal proceeding, issue and enter the following Order:
9	<u>ORDER</u>
10	IT IS HEREBY ORDERED that Respondent Best Buy Drugs' Permit No. PHY 55583 and
11	Respondent Mansour's Pharmacist License No. RPH 44325 are surrendered and accepted by the
12	Board.
13	1. The surrender of Respondent Best Buy Drugs' Permit No. PHY 55583 and
14	Respondent Mansour's Pharmacist License No. RPH 44325 and the acceptance of the surrendered
15	permit and license by the Board shall constitute the imposition of discipline against Respondents.
16	This stipulation constitutes a record of the discipline and shall become a part of Respondents'
17	license history with the Board. Respondents understand and agree that for purposes of Business
18	and Professions Code section 4307, this surrender shall be construed the same as revocation.
19	2. Respondent Best Buy Drugs shall lose all rights and privileges as a pharmacy in
20	California as of the effective date of the Board's Decision and Order.
21	3. Respondent Mansour shall lose all rights and privileges as a pharmacist in California
22	as of the effective date of the Board's Decision and Order.
23	4. Respondents shall cause to be delivered to the Board any pocket licenses and, if one
24	was issued, any wall certificates on or before the effective date of the Decision and Order.
25	5. If either Respondent ever files an application for licensure or a petition for
26	reinstatement in the State of California, the Board shall treat it as a new application for licensure.
27	Respondents must comply with all the laws, regulations and procedures for licensure in effect at
28	the time the application or petition is filed, and all of the charges and allegations contained in
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	Stipulated Surrender of License (Case No. 7572)

1	Accusation No. 7573 shall be deemed to be true, correct and admitted by Respondents when the
2	Board determines whether to grant or deny the application(s) or petition(s).
3	6. Respondents shall pay the agency its costs of investigation and enforcement in the
4	amount of \$1,603.75 prior to issuance of a new or reinstated license.
5	7. If Respondents should ever apply or reapply for a new license or certification, or
6	petition for reinstatement of a license, by any other health care licensing agency in the State of
7	California, all of the charges and allegations contained in Accusation, No. 7573 shall be deemed
8	to be true, correct, and admitted by Respondents for the purpose of any Statement of Issues or any
9	other proceeding seeking to deny or restrict licensure.
10	8. Respondents may not apply, reapply, or petition for any licensure or registration of
11	the Board for three (3) years from the effective date of the Decision and Order.
12	ACCEPTANCE
13	I have carefully read the Stipulated Surrender of License and Order. I understand the
14	stipulation and the effect it will have on my Permit (PHY 55583.) I enter into this Stipulated
15	Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound
16	by the Decision and Order of the Board of Pharmacy.
17	
18	DATED:
19	PAUL MANSOUR As President and authorized agent on behalf
20	of MANSOUR PARTNERS, INC. DBA BEST BUY DRUGS
21	Respondent
22	I have carefully read the Stipulated Surrender of License and Order. I understand the
23	stipulation and the effect it will have on my License (RPH 44325.) I enter into this Stipulated
24	Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound
25	by the Decision and Order of the Board of Pharmacy.
26	
27	DATED:
28	PAUL MANSOUR Respondent
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	Stipulated Surrender of License (Case No. 7573)

1	Accusation No. 7573 shall be deemed to be true, correct and admitted by Respondents when the
2	Board determines whether to grant or deny the application(s) or petition(s).
3	6. Respondents shall pay the agency its costs of investigation and enforcement in the
4	amount of \$1,603.75 prior to issuance of a new or reinstated license.
5	7. If Respondents should ever apply or reapply for a new license or certification, or
6	petition for reinstatement of a license, by any other health care licensing agency in the State of
7	California, all of the charges and allegations contained in Accusation, No. 7573 shall be deemed
8	to be true, correct, and admitted by Respondents for the purpose of any Statement of Issues or any
9	other proceeding seeking to deny or restrict licensure.
10	8. Respondents may not apply, reapply, or petition for any licensure or registration of
11	the Board for three (3) years from the effective date of the Decision and Order.
12	ACCEPTANCE
13	I have carefully read the Stipulated Surrender of License and Order. I understand the
14	stipulation and the effect it will have on my Permit (PHY 55583.) I enter into this Stipulated
15	Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound
16	by the Decision and Order of the Board of Pharmacy.
17	and
18	DATED: 11/5/23 PARA
19	PAUL MANSOUR As President and authorized agent on behalf
20	of MANSOUR PARTNERS, INC. DBA BEST BUY DRUGS
21	Respondent
22	I have carefully read the Stipulated Surrender of License and Order. I understand the
23	stipulation and the effect it will have on my License (RPH 44325.) I enter into this Stipulated
24	Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound
25	by the Decision and Order of the Board of Pharmacy.
26	and
27	DATED: 1/5/23
28	PAUL MANSOUR Respondent
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	Stipulated Surrender of License (Case No. 7573)

Stipulated Surrender of License (Case No. 7573)

1	I	ENDORSEMENT
2	The foregoing Stipulated Surrende	er of License and Order is hereby respectfully submitted
3	for consideration by the Board of Pharm	acy of the Department of Consumer Affairs.
4	DATED:	Respectfully submitted,
5		ROB BONTA
6		Attorney General of California ARMANDO ZAMBRANO
7		Supervising Deputy Attorney General
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9 10		THOMAS L. RINALDI Supervising Deputy Attorney General Attorneys for Complainant
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		Stipulated Surrander of License (Case No. 7573)

1		<u>ENDORSEMENT</u>
2	The foregoing Stipulated Surrence	ler of License and Order is hereby respectfully submitted
3	for consideration by the Board of Pharm	macy of the Department of Consumer Affairs.
4	DATED: 11-28-23	Respectfully submitted,
5		ROB BONTA
6		Attorney General of California ARMANDO ZAMBRANO
7		Supervising Deputy Attorney General
8		
9		THOMAS L. RINALDI Supervising Deputy Attorney General
10		Attorneys for Complainant
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		6 Stipulated Surrander of License (Case No. 7573)

Exhibit A

Accusation No. 7573

1 2 3 4 5 6 7 8 9	ROB BONTA Attorney General of California ARMANDO ZAMBRANO Supervising Deputy Attorney General THOMAS L. RINALDI Supervising Deputy Attorney General State Bar No. 206911 300 So. Spring Street, Suite 1702 Los Angeles, CA 90013 Telephone: (213) 269-6310 Facsimile: (916) 731-2126 Attorneys for Complainant BEFOR BOARD OF P DEPARTMENT OF CO STATE OF CA	HARMACY ONSUMER AFFAIRS
11	In the Matter of the Accusation Against:	Case No. 7573
12	MANSOUR PARTNERS, INC.	ACCUSATION
13	DBA BEST BUY DRUGS, YOUSEF MANSOUR, PAUL MANSOUR	
14	29 N. Baldwin Ave Sierra Madre, CA 91024	
15	Permit No. PHY 55583,	
16	and	
17 18	PAUL MANSOUR 220 S. Hermosa Ave Sierra Madre, CA 91024	
19	Pharmacist License No. RPH 44325	
20	Respondents.	
21		
22 23	PART	TIES
23		s this Accusation solely in her official capacity
25	as the Executive Officer of the Board of Pharmac	y (Board), Department of Consumer Affairs.
26	2. On or about February 24, 2017, the Be	oard of Pharmacy issued Permit Number PHY
27	55583 to Mansour Partners, Inc. dba Best Buy Dr	ugs (Respondent Best Buy Drugs), with Yousef
28	Mansour designated as the Chief Executive Office	er, President, and 50% shareholder since
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	(MANSOUR PARTNERS, IN	IC. DBA BEST BUY DRUGS, ET AL.) ACCUSATION

1	February 24, 2017, and Paul Mansour designated as President, 50% shareholder, Secretary, and
2	Treasurer/Chief Financial Officer since February 24, 2017. The Permit was in full force and
3	effect at all times relevant to the charges brought herein and will expire on February 1, 2024,
4	unless renewed.
5	3. On or about August 5, 1991, the Board of Pharmacy issued Pharmacist License
6	Number RPH 44325 to Paul Mansour (Respondent Mansour). The Pharmacist License was in
7	full force and effect at all times relevant to the charges brought herein and will expire on
8	December 31, 2024, unless renewed.
9	4. This Accusation is brought before the Board under the authority of the following
10	laws. All section references are to the Business and Professions Code unless otherwise indicated.
11	5. Section 4300 provides, in pertinent part, that every license issued by the Board is
12	subject to discipline, including suspension or revocation.
13	6. Section 4300.1 states:
14	The expiration, cancellation, forfeiture, or suspension of a board-issued license
15 16	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
17	a decision suspending or revoking the license.
18	STATUTORY PROVISIONS
19	7. Section 490 provides, in pertinent part, that a board may suspend or revoke a license
20	on the ground that the licensee has been convicted of a crime substantially related to the
21	qualifications, functions, or duties of the business or profession for which the license was issued.
22	8. Section 4301 states, in pertinent part:
23	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
24	conduct shall include, but is not limited to, any of the following:
25 26	
26 27	(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.
28	(g) Knowingly making or signing any certificate or other document that falsely
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	(MANSOUR PARTNERS, INC. DBA BEST BUY DRUGS, ET AL.) ACCUSATION

represents the existence or nonexistence of a state of facts.

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

(1) 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.

(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.

9. Section 4302 states:

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The board may deny, suspend, or revoke any license where conditions exist in relation to any person holding 10 percent or more of the ownership interest or where conditions exist in relation to any officer, director, or other person with management or control of the license that would constitute grounds for disciplinary action against a licensee.

10. Section 4307 states, in pertinent part:

(a) Any person who has been denied a license or whose license has been revoked or is under suspension, or who has failed to renew his or her license while it was under suspension, or who has been a manager, administrator, owner, member, officer, director, associate, partner, or any other person with management or control of any partnership, corporation, trust, firm, or association whose application for a license has been denied or revoked, is under suspension or has been placed on probation, and while acting as the manager, administrator, owner, member, officer, director, associate, partner, or any other person with management or control had knowledge of or knowingly participated in any conduct for which the license was

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1 2	denied, revoked, suspended, or placed on probation, shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, partner, or in any other position with management or control of a licensee as follows:
3	(1) Where a probationary license is issued or where an existing license is placed on probation, this prohibition shall remain in effect for a period not to exceed five
4	years.
5	(2) Where the license is denied or revoked, the prohibition shall continue until the license is issued or reinstated.
6	11. Health and Safety Code section 11173 states:
7	(a) No person shall obtain or attempt to obtain controlled substances, or procure or attempt to procure the administration of or prescription for controlled
8 9	substances, (1) by fraud, deceit, misrepresentation, or subterfuge; or (2) by the concealment of a material fact.
10	(b) No person shall make a false statement in any prescription, order, report, or record, required by this division.
11	(c) No person shall, for the purpose of obtaining controlled substances, falsely
12	assume the title of, or represent himself to be, a manufacturer, wholesaler, pharmacist, physician, dentist, veterinarian, registered nurse, physician's assistant, or other authorized person.
13	
14	(d) No person shall affix any false or forged label to a package or receptacle containing controlled substances.
15	REGULATORY PROVISIONS
16	12. California Code of Regulations, title 16, section 1770, states:
17	(a) For the purpose of denial, suspension, or revocation of a personal or facility license pursuant to Section 141 or Division 1.5 (commencing with Section 475) of the
18	Business and Professions Code, a crime, professional misconduct, or act shall be considered substantially related to the qualifications, functions or duties of the
19 20	practice, profession, or occupation that may be performed under the license type sought or held if to a substantial degree it evidences present or potential unfitness of an applicant or licensee to perform the functions authorized by the license in a
21	manner consistent with the public health, safety, or welfare.
22	(b) In making the substantial relationship determination required under subdivision (a) for a crime, the board will consider the following criteria:
23	(1) The nature and gravity of the offense;
24	(2) The number of years elapsed since the date of the offense; and
25	(3) The nature and duties of the practice, profession, or occupation that may be performed under the license type sought or held.
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27	(c) For purposes of subdivision (a), substantially related crimes, professional misconduct, or acts shall include, but are not limited to, those which:
28	(1) Violate or attempt to violate, directly or indirectly, or to aid, abet or
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	(MANSOUR PARTNERS, INC. DBA BEST BUY DRUGS, ET AL.) ACCUSATI

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1 2 3 4 5 6	 conspire to violate, any provision of law of this state, or any other jurisdiction, governing the practice of pharmacy. (2) Violate or attempt to violate, directly or indirectly, or to aid, abet or conspire to violate, any provision of Chapter 13 (commencing with Section 801) of Title 21 of the United States Code regulating controlled substances or any law of this state, or any other jurisdiction, relating to controlled substances or dangerous drugs. (3) Violate or attempt to violate, directly or indirectly, or to aid, abet or conspire to violate, any provision of law of this state, or any other jurisdiction, relating to government provided or government supported healthcare.
7	(4) Involve dishonesty, fraud, deceit, or corruption related to money, items, documents, or personal information.
8	(5) Involve a conviction for driving under the influence of drugs or alcohol.
9	<u>COST RECOVERY</u>
10	13. Section 125.3 states, in pertinent part, that the Board may request the administrative
11	law judge to direct a licentiate found to have committed a violation or violations of the licensing
12	act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
13	case.
14	FIRST CAUSE FOR DISCIPLINE
15	(Conviction of a Substantially Related Crime)
16	14. Respondents Best Buy Drugs and Mansour are subject to disciplinary action under
17	sections 4300, and 4301, subdivisions (1) and (0), in conjunction with section 4302 and California
18	Code of Regulations, title 16, section 1770, on the grounds of unprofessional conduct, in that
19	Respondent Mansour committed a substantially related crime, as follows: On or about March 8,
20	
	2023, after pleading guilty, Respondent Mansour was convicted of one felony count of violating
21	Title 18, United States Code, Section 1347 [health care fraud], in the criminal proceeding entitled
21 22	
22	Title 18, United States Code, Section 1347 [health care fraud], in the criminal proceeding entitled
22 23	Title 18, United States Code, Section 1347 [health care fraud], in the criminal proceeding entitled <i>United States of America v. Paul Mansour</i> (U.S.C.D. Cal., 2023, No. 2:23-cr-00100). The
22 23 24	Title 18, United States Code, Section 1347 [health care fraud], in the criminal proceeding entitled <i>United States of America v. Paul Mansour</i> (U.S.C.D. Cal., 2023, No. 2:23-cr-00100). The circumstances surrounding the conviction are that between January 2017, and continuing to or
22 23 24 25	Title 18, United States Code, Section 1347 [health care fraud], in the criminal proceeding entitled <i>United States of America v. Paul Mansour</i> (U.S.C.D. Cal., 2023, No. 2:23-cr-00100). The circumstances surrounding the conviction are that between January 2017, and continuing to or around June 2022, Respondent Mansour created fake patient profiles at Best Buy Pharmacy
	Title 18, United States Code, Section 1347 [health care fraud], in the criminal proceeding entitled <i>United States of America v. Paul Mansour</i> (U.S.C.D. Cal., 2023, No. 2:23-cr-00100). The circumstances surrounding the conviction are that between January 2017, and continuing to or around June 2022, Respondent Mansour created fake patient profiles at Best Buy Pharmacy where he was the 50% owner and pharmacist-in-charge. The fictitious patient profiles duplicated
22 23 24 25 26	Title 18, United States Code, Section 1347 [health care fraud], in the criminal proceeding entitled <i>United States of America v. Paul Mansour</i> (U.S.C.D. Cal., 2023, No. 2:23-cr-00100). The circumstances surrounding the conviction are that between January 2017, and continuing to or around June 2022, Respondent Mansour created fake patient profiles at Best Buy Pharmacy where he was the 50% owner and pharmacist-in-charge. The fictitious patient profiles duplicated prescriptions for medications provided to real patients of the pharmacy without the patient's
22 23 24 25 26 27	Title 18, United States Code, Section 1347 [health care fraud], in the criminal proceeding entitled <i>United States of America v. Paul Mansour</i> (U.S.C.D. Cal., 2023, No. 2:23-cr-00100). The circumstances surrounding the conviction are that between January 2017, and continuing to or around June 2022, Respondent Mansour created fake patient profiles at Best Buy Pharmacy where he was the 50% owner and pharmacist-in-charge. The fictitious patient profiles duplicated prescriptions for medications provided to real patients of the pharmacy without the patient's permission or knowledge of the prescribing physicians. Respondent Mansour then submitted false

1	between \$600,000 and \$1,047,243.	
2	SECOND CAUSE FOR DISCIPLINE	
3	(Dishonesty, Fraud, or Deceit)	
4	15. Respondents Best Buy Drugs and Mansour are subject to disciplinary action under	
5	sections 4301, subsection (f), and 4302, in that they committed acts of dishonesty, fraud, or deceit	
6	by admittedly defrauding Medicare. Complainant refers to, and by this reference incorporates,	
7	the allegations set forth above in paragraph 14, as though set forth fully herein.	
8	THIRD CAUSE FOR DISCIPLINE	
9	(Forged Prescriptions)	
10	16. Respondents Best Buy Drugs and Mansour are subject to disciplinary action under	
11	section 4301, subdivision (g), for violating section 4324, subdivision (a) and Health and Safety	
12	Code section 11173, subdivision (b), in that Respondent Mansour created false prescriptions.	
13	Complainant refers to, and by this reference incorporates, the allegations set forth above in	
14	paragraph 14, as though set forth fully.	
15	FOURTH CAUSE FOR DISCIPLINE	
16	(Violation of State Statutes Regulating Controlled Substances)	
17	17. Respondents Best Buy Drugs and Mansour are subject to disciplinary action under	
18	section 4301, subdivisions (j) and (o), for unprofessional conduct in that Respondents violated	
19	state statutes regulating controlled substances. Complainant refers to, and by this reference	
20	incorporates, the allegations set forth above in paragraph 14, as though set forth fully.	
21	OTHER MATTERS	
22	18. Pursuant to section 4307 of the Code, if discipline is imposed on Pharmacy License	
23	number PHY 55583 issued to Mansour Partners, Inc. dba Best Buy Drugs, then Mansour	
24	Partners, Inc., shall be prohibited from serving as a manager, administrator, owner, member,	
25	officer, director, associate, or partner of a licensee for 1) a period not to exceed five (5) years if	
26	Pharmacy Permit number PHY 55583 is placed on probation; or, 2) if the pharmacy permit is	
27	revoked, the prohibition shall continue until the pharmacy permit is reinstated.	
28	///	
	6	
	(MANSOUR PARTNERS, INC. DBA BEST BUY DRUGS, ET AL.) ACCUSATION	

1	19. Pursuant to section 4307 of the Code, if discipline is imposed on Pharmacy License		
2	number PHY 55583 issued to Mansour Partners, Inc. dba Best Buy Drugs, then Paul Mansour,		
3	President, shall be prohibited from serving as a manager, administrator, owner, member, officer,		
4	director, associate, or partner of a licensee for 1) a period not to exceed five (5) years if Pharmacy		
5	Permit number PHY 55583 is placed on probation; or, 2) if the pharmacy permit is revoked, the		
6	prohibition shall continue until the pharmacy permit is reinstated.		
7	<u>PRAYER</u>		
8	WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,		
9	and that following the hearing, the Board of Pharmacy issue a decision:		
10	1. Revoking or suspending Permit Number PHY 55583, issued to Mansour Partners,		
11	Inc. dba Best Buy Drugs, Yousef Mansour, Paul Mansour;		
12	2. Revoking or suspending Pharmacist License Number RPH 44325, issued to Paul		
13	Mansour;		
14	3. Prohibiting Mansour Partners, Inc. dba Best Buy Drugs from serving as a manager,		
15	administrator, owner, member, officer, director, associate, partner, or in any other position with		
16	management or control of any Pharmacy licensee;		
17	4. Prohibiting Paul Mansour from serving as a manager, administrator, owner, member,		
18	officer, director, associate, partner, or in any other position with management or control of any		
19	Pharmacy licensee;		
20	5. Ordering Best Buy Drugs and Paul Mansour to pay the Board of Pharmacy the		
21	reasonable costs of the investigation and enforcement of this case, pursuant to Business and		
22	Professions Code section 125.3; and,		
23	///		
24	///		
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	7		
	(MANSOUR PARTNERS, INC. DBA BEST BUY DRUGS, ET AL.) ACCUSATION		

6. Taking such other a	and further action as deemed necessary and proper.
2	Sodergren, Anne@DCA
B DATED: <u>9/5/2023</u>	Anne@DCA Date: 2023.09.05 08:53:51 -07'00' ANNE SODERGREN
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5	Board of Pharmacy Department of Consumer Affairs State of California
5	Complainant
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