

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

In the Matter of the Accusation Against:

SHEIDA ELIZABETH KETABCHI, Respondent

Pharmacist License No. RPH 81734

Agency Case No. 7637

OAH No. 2023120266

DECISION AND ORDER

The attached Stipulated Surrender of License 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 May 8, 2024.

It is so ORDERED on April 8, 2024.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By

A handwritten signature in black ink, appearing to read "Seung W. Oh", is written over a light gray rectangular background.

Seung W. Oh, Pharm.D.
Board President

1 ROB BONTA
Attorney General of California
2 ERIN M. SUNSERI
Supervising Deputy Attorney General
3 ALAN MACINA
Deputy Attorney General
4 State Bar No. 233540
600 West Broadway, Suite 1800
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6 San Diego, CA 92186-5266
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Attorneys for Complainant

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

12 In the Matter of the Accusation Against:

13 **SHEIDA ELIZABETH KETABCHI**
14 **12376 Carmel Country Road, # 204**
San Diego, CA 92130
15 **Pharmacist License No. RPH 81734**

16 Respondent.

Case No. 7637

OAH No. 2023120266

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
18 entitled proceedings that the following matters are true:

19 **PARTIES**

20 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy
21 (Board). She brought this action solely in her official capacity and is represented in this matter by
22 Rob Bonta, Attorney General of the State of California, by Alan Macina, Deputy Attorney
23 General.

24 2. Sheida Elizabeth Ketabchi (Respondent) is represented in this proceeding by attorney
25 Nicole Weil, Esq., whose address is 9474 Kearny Villa Road, Suite 101, San Diego, California
26 92126.

27 3. On or about December 16, 2019, the Board issued Pharmacist License No. RPH
28 81734 to Respondent. The Pharmacist License was in full force and effect at all times relevant to

1 the charges brought in Accusation No. 7637, expired on December 31, 2023, and has not been
2 renewed.

3 **JURISDICTION**

4 4. Accusation No. 7637 was filed before the Board, and is currently pending against
5 Respondent. The Accusation and all other statutorily required documents were properly served
6 on Respondent on November 15, 2023. Respondent timely filed her Notice of Defense contesting
7 the Accusation. A copy of Accusation No. 7637 is attached as Exhibit A and incorporated by
8 reference.

9 **ADVISEMENT AND WAIVERS**

10 5. Respondent has carefully read, fully discussed with counsel, and understands the
11 charges and allegations in Accusation No. 7637. Respondent also has carefully read, fully
12 discussed with counsel, and understands the effects of this Stipulated Surrender of License and
13 Order.

14 6. Respondent is fully aware of her legal rights in this matter, including the right to a
15 hearing on the charges and allegations in the Accusation; the right to confront and cross-examine
16 the witnesses against her; the right to present evidence and to testify on her own behalf; the right
17 to the issuance of subpoenas to compel the attendance of witnesses and the production of
18 documents; the right to reconsideration and court review of an adverse decision; and all other
19 rights accorded by the California Administrative Procedure Act and other applicable laws.

20 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
21 every right set forth above.

22 **CULPABILITY**

23 8. Respondent understands that the charges and allegations in Accusation No. 7637, if
24 proven at a hearing, constitute cause for imposing discipline upon her Pharmacist License.

25 9. To resolve the Accusation without the expense and uncertainty of further
26 proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for
27 the charges in the Accusation and that those charges constitute cause for discipline. Respondent
28 hereby gives up her right to contest that cause for discipline exists based on those charges.

10. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Pharmacist License without further process.

CONTINGENCY

11. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

12. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

13. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Pharmacist License No. RPH 81734, issued to Respondent Sheida Elizabeth Ketabchi, is surrendered and accepted by the Board.

1. The surrender of Respondent's Pharmacist License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent.

1 This stipulation constitutes a record of the discipline and shall become a part of Respondent's
2 license history with the Board. Respondent understands and acknowledges that, for purposes of
3 Business and Professions Code section 4307, this Stipulated Surrender is the same as a
4 revocation.

5 2. Respondent shall lose all rights and privileges as a Pharmacist in California as of the
6 effective date of the Board's Decision and Order.

7 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
8 issued, her wall certificate on or before the effective date of the Decision and Order.

9 4. Respondent may not apply for any license, permit, or registration from the board for
10 three years from the effective date of this decision. If Respondent ever applies for licensure or
11 petitions for reinstatement in the State of California, the Board shall treat it as a new application
12 for licensure. Respondent is required to report this surrender as disciplinary action. Respondent
13 must comply with all the laws, regulations, and procedures for licensure in effect at the time the
14 application or petition is filed, including, but not limited to, taking and passing licensing
15 examination(s) as well as fulfilling any education or experience requirements prior to the issuance
16 of a new license, and that all of the charges and allegations contained in Accusation No. 7637
17 shall be deemed to be true, correct, and admitted by Respondent when the Board determines
18 whether to grant or deny the application or petition.

19 5. Respondent shall pay the agency its costs of investigation and enforcement in the
20 amount of \$19,868.25 prior to reapplication for a new or reinstated license.

21 6. If Respondent should ever apply or reapply for a new license or certification, or
22 petition for reinstatement of a license, by any other health care licensing agency in the State of
23 California, all of the charges and allegations contained in Accusation, No. 7637 shall be deemed
24 to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any
25 other proceeding seeking to deny or restrict licensure.

26 **ACCEPTANCE**

27 I have carefully read the above Stipulated Surrender of License and Order and have fully
28 discussed it with my attorney Nicole Weil, Esq. I understand the stipulation and the effect it will

1 have on my Pharmacist License. I enter into this Stipulated Surrender of License and Order
2 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
3 Board of Pharmacy.

4
5 DATED: _____
6 SHEIDA ELIZABETH KETABCHI
7 Respondent

8 I have read and fully discussed with Respondent Sheida Elizabeth Ketabchi the terms and
9 conditions and other matters contained in this Stipulated Surrender of License and Order. I
10 approve its form and content.

11 DATED: _____
12 NICOLE WEIL, ESQ.
13 Attorney for Respondent

14 **ENDORSEMENT**

15 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
16 for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

17
18 DATED: _____ Respectfully submitted,
19
20 ROB BONTA
21 Attorney General of California
22 ERIN M. SUNSERI
23 Supervising Deputy Attorney General
24
25 ALAN MACINA
26 Deputy Attorney General
27 Attorneys for Complainant
28

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1 have on my Pharmacist License. I enter into this Stipulated Surrender of License and Order
2 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
3 Board of Pharmacy.

4
5 DATED: 02/26/2024 *Sheida Ketabchi*
6 Sheida Ketabchi (Feb 26, 2024 16:17 PST)
7 SHEIDA ELIZABETH KETABCHI
8 Respondent

9 I have read and fully discussed with Respondent Sheida Elizabeth Ketabchi the terms and
10 conditions and other matters contained in this Stipulated Surrender of License and Order. I
11 approve its form and content.

12 DATED: 02/26/2024 *Nicole Weil*
13 NICOLE WEIL, ESQ.
14 Attorney for Respondent

15 **ENDORSEMENT**

16 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
17 for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

18 DATED: _____ Respectfully submitted,
19 ROB BONTA
20 Attorney General of California
21 ERIN M. SUNSERI
22 Supervising Deputy Attorney General
23
24 ALAN MACINA
25 Deputy Attorney General
26 Attorneys for Complainant

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1 have on my Pharmacist License. I enter into this Stipulated Surrender of License and Order
2 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
3 Board of Pharmacy.

4
5 DATED: _____
6 SHEIDA ELIZABETH KETABCHI
7 Respondent

8 I have read and fully discussed with Respondent Sheida Elizabeth Ketabchi the terms and
9 conditions and other matters contained in this Stipulated Surrender of License and Order. I
10 approve its form and content.

11 DATED: _____
12 NICOLE WEIL, ESQ.
13 Attorney for Respondent

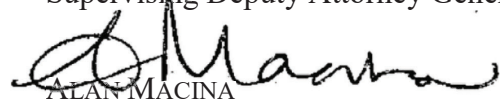
14 **ENDORSEMENT**

15 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
16 for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

17
18 DATED: 26 Feb. 2024

Respectfully submitted,

19
20 ROB BONTA
21 Attorney General of California
22 ERIN M. SUNSERI
23 Supervising Deputy Attorney General

24 
25 ALAN MACINA
26 Deputy Attorney General
27 Attorneys for Complainant
28

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Exhibit A

Accusation No. 7637

1 ROB BONTA
Attorney General of California
2 ERIN M. SUNSERI
Supervising Deputy Attorney General
3 ALAN MACINA
Deputy Attorney General
4 State Bar No. 233540
600 West Broadway, Suite 1800
5 San Diego, CA 92101
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6 San Diego, CA 92186-5266
Telephone: (619) 738-9083
7 Facsimile: (619) 645-2061
Attorneys for Complainant
8

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

12 In the Matter of the Accusation Against:

Case No. 7637

13 **SHEIDA ELIZABETH KETABCHI**
14 **12376 Carmel Country Road, # 204**
San Diego, CA 92130

ACCUSATION

15 **Pharmacist License No. RPH 81734**

16 Respondent.
17

18 **PARTIES**

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

21 2. On or about December 16, 2019, the Board issued Pharmacist License Number RPH
22 81734 to Sheida Elizabeth Ketabchi (Respondent). The Pharmacist License was in full force and
23 effect at all times relevant to the charges brought herein and will expire on December 31, 2023
24 unless renewed.

25 3. On or about October 31, 2023, the Court granted the Board's petition for an interim
26 suspension of Respondent's Pharmacist License until this action is heard and decided.

27 **JURISDICTION**

28 4. This Accusation is brought before the Board under the authority of the following

1 laws. All references are to the Business and Professions Code (Code) unless otherwise indicated.

2 5. Section 4011 of the Code provides that the Board shall administer and enforce both
3 the Pharmacy Law (Code, § 4000, et seq.) and the Uniform Controlled Substance Act (Health &
4 Safety Code, § 11000, et seq.).

5 6. Section 4101, subdivision (a), of the Code states:

6 (a) A pharmacist may take charge of and act as the pharmacist-in-charge of a
7 pharmacy upon application by the pharmacy and approval by the board. A
8 pharmacist-in-charge who ceases to act as the pharmacist-in-charge of the pharmacy
shall notify the board in writing within 30 days of the date of that change in status.

9 7. Section 4300, subdivision (a), of the Code states that “Every license issued may be
10 suspended or revoked.”

11 8. Section 4300.1 of the Code states:

12 The expiration, cancellation, forfeiture, or suspension of a board-issued license
13 by operation of law or by order or decision of the board or a court of law, the
14 placement of a license on a retired status, or the voluntary surrender of a license by a
15 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.

16 **STATUTORY PROVISIONS**

17 9. Section 4301 of the Code states, in part:

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

20 . . .

21 (b) Incompetence.

22 (c) Gross negligence.

23 . . .

24 (f) The commission of any act involving moral turpitude, dishonesty, fraud,
25 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.

26 . . .

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

1 ...

2 (o) Violating or attempting to violate, directly or indirectly, or assisting in or
3 abetting the violation of or conspiring to violate any provision or term of this chapter or
4 of the applicable federal and state laws and regulations governing pharmacy, including
5 regulations established by the board or by any other state or federal regulatory agency.

6

7 10. Section 4022 of the Code states, in part:

8 Dangerous drug or dangerous device means any drug or device unsafe for
9 self-use in humans or animals, and includes the following:

10 (a) Any drug that bears the legend: "Caution: federal law prohibits dispensing
11 without prescription," "Rx only," or words of similar import.

12 ...

13 (c) Any other drug or device that by federal or state law can be lawfully
14 dispensed only on prescription or furnished pursuant to Section 4006.

15 11. Section 4059 of the Code states, in part, that a person may not furnish any dangerous
16 drug except upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or
17 naturopathic doctor pursuant to Section 3640.7.

18 12. Section 4060 of the Code states, in part:

19 A person shall not possess any controlled substance, except that furnished to a
20 person upon the prescription of a physician, dentist, podiatrist, optometrist,
21 veterinarian, nurse practitioner practicing pursuant to Section 2837.103 or 2837.104,
22 or naturopathic doctor pursuant to Section 3640.7, or furnished pursuant to a drug
23 order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse
24 practitioner practicing pursuant to Section 2836.1, a physician assistant pursuant to
25 Section 3502.1, a naturopathic doctor pursuant to Section 3640.5, or a pharmacist
26 pursuant to Section 4052.1, 4052.2, or 4052.6. This section does not apply to the
27 possession of any controlled substance by a manufacturer, wholesaler, third-party
28 logistics provider, pharmacy, pharmacist, physician, podiatrist, dentist, optometrist,
veterinarian, naturopathic doctor, certified nurse-midwife, nurse practitioner, or
physician assistant, if in stock in containers correctly labeled with the name and
address of the supplier or producer.

....

13. Section 4307 of the Code states:

(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 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:

(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 years.

(2) Where the license is denied or revoked, the prohibition shall continue until the license is issued or reinstated.

(b) Manager, administrator, owner, member, officer, director, associate, partner, or any other person with management or control of a license as used in this section and Section 4308, may refer to a pharmacist or to any other person who serves in such capacity in or for a licensee.

(c) The provisions of subdivision (a) may be alleged in any pleading filed pursuant to Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the Government Code. However, no order may be issued in that case except as to a person who is named in the caption, as to whom the pleading alleges the applicability of this section, and where the person has been given notice of the proceeding as required by Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the Government Code. The authority to proceed as provided by this subdivision shall be in addition to the board's authority to proceed under Section 4339 or any other provision of law.

14. Section 11170 of the Health and Safety Code states that, "No person shall prescribe, administer, or furnish a controlled substance for himself."

COST RECOVERY

15. Section 125.3 of the Code states, in 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.

DEFINITIONS

16. Adderall is a brand name for mixed amphetamine salts, a medication used to treat attention-deficit hyperactivity disorder, and is a Schedule-II controlled substance and a dangerous drug under California law. (Health & Saf. Code, § 11055, subd. (d)(1); Bus. & Prof. Code, § 4022.)

///

FACTUAL ALLEGATIONS

17. While working as a pharmacist at two pharmacy locations in San Diego County beginning in March through May 2023, Respondent verified nine generic prescriptions for Adderall but each prescription was missing at least two—and as many as ten—tablets. No excess pills were found in other prescriptions or in the stock bottles. In two of these instances, Respondent can be seen on video filling these controlled-substance prescriptions, retaining two tablets in her hand, and then leaving the frame of view. Those two prescriptions were each found to be short by two tablets. Coincidentally, Respondent holds a prescription for Adderall, the controlled substance that was shorted in the nine prescriptions.

18. In 2023, one of the pharmacies, pharmacy number 9103, reported a loss of 30 tablets of mixed amphetamine salt (30 mg.). The other pharmacy, number 9528, reported a loss of 24 tablets of mixed amphetamine salt (30 mg.) and 99 tablets of mixed amphetamine salt (20 mg.).

19. A Board inspector investigated the losses and determined that, as above, nine prescriptions at the pharmacies filled in March through May 2023 by Respondent were missing tablets. In surveillance video of Respondent filling two of these prescriptions, Respondent can be seen shorting the prescriptions by two tablets and leaving the area carrying the stolen tablets. The approximate initial fill date and discrepancy narratives of the nine prescriptions for mixed amphetamine salt (30 mg.) filled and verified by Respondent in March through May 2023 follow:

20. Pharmacy number 9103

- a. March 30: Staff found that the 90-tablet prescription lacked five tablets (Rx 3103187);
- b. April 12: The patient complained that the 60-tablet prescription was lacking five tablets (Rx 3101089);
- c. April 12: Staff found that a 60-tablet prescription lacked five tablets (Rx 3126781);

21. Pharmacy number 9528

- d. March 14: Respondent re-verified and re-processed the prescription on subsequent dates, after which staff found that the 90-tablet prescription was missing ten tablets (Rx 2261534);
- e. April 10: Staff found that the 60-tablet prescription lacked five tablets when checking it

on April 13, and staff added five tablets and returned it to the “waiting bin” with the correct number of 60 tablets so that the patient would not be shorted. On April 19, Respondent re-verified the prescription, yet staff found later than the prescription was missing two tablets , causing staff to add two tablets so that the patient was not shorted medication (Rx 2283160);

f. April 13: Staff found that the 120-tablet prescription lacked ten tablets (Rx 2298227);

g. April 17: Staff found that the 30-tablet prescription lacked two tablets (Rx 2286788);

h. May 1: Staff found that the 30-tablet prescription lacked two tablets. Video showed Respondent putting 28 tablets into the patient’s bottle, returning other tablets to the stock bottle, and then leaving the frame with two tablets in her hand (Rx 2304601); and

i. May 2: Staff found that the 60-tablet prescription lacked two tablets. Video showed Respondent putting 58 tablets into the patient’s bottle, counting 11 remaining tablets and returning nine of them to the stock bottle, and then leaving the frame with two tablets in her hand (Rx 2305117).

22. Respondent initially stated that she shorted prescriptions to correct pharmacy inventory shortages. But during the time of these prescription discrepancies, neither the pharmacies nor their pharmacists reported a shortage of stock of mixed amphetamine salts that would explain why any singular prescriptions might be shorted. If there was an inventory shortage, it would still be illegal and unethical to short a patient’s prescription. It would also be illegal and unethical not to report the shortage. A stock shortage would not properly be remedied by Respondent leaving the filling area (where the stock bottle is) with individual pills in her hand. And no stock overages of this drug were reported.

FIRST CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Moral Turpitude, Dishonesty, Fraud, Deceit, or Corruption)

23. Respondent is subject to disciplinary action under Code section 4301, subdivision (f), in that Respondent committed an act or acts of moral turpitude or acted dishonestly, fraudulently, deceitfully, or corruptly in her practice as a pharmacist in that she stole controlled substances, as detailed in the Factual Allegations paragraphs above and incorporated here by reference.

///

1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Violation of Law Regulating Controlled Substances)**

3 24. Respondent is subject to disciplinary action under Code section 4301, subdivisions (j)
4 and (o), in that Respondent violated the federal and/or state law or laws governing controlled
5 substances and Pharmacy law, including Code section 4060 and Health and Safety Code section
6 11170, as detailed in the Factual Allegations paragraphs above and incorporated here by reference.

7 **THIRD CAUSE FOR DISCIPLINE**

8 **(Failure to Timely Notify the Board of Disassociation as Pharmacist-in-Charge)**

9 25. Respondent is subject to disciplinary action under Code section 4101, subdivision (a),
10 in that Respondent failed to notify the Board within thirty days after she ceased to act as
11 Pharmacist-in-Charge (PIC). The circumstances are that, on or about December 6, 2022, the
12 Board received an Application for Change of PIC from pharmacy number 9195, a pharmacy
13 located in San Diego County. The form had been signed under penalty of perjury by a corporate
14 officer of the pharmacy and by Respondent, who had acted as the pharmacy's prior PIC. The form
15 indicated that Respondent dissociated as PIC on October 2, 2022 and identified the new PIC and
16 that her service in that role was to begin the following day. At the time of the application, the
17 Board had not received notice from Respondent of her disassociation as PIC, some 60 days after
18 the pharmacy's change in PIC. The Board notified Respondent via electronic mail on or about
19 March 7, 2023 and requested notification of Respondent's disassociation as PIC by March 14,
20 2023. Respondent did not timely respond to the Board's request.

21 **OTHER MATTERS**

22 26. Pursuant to Code section 4307, if discipline is imposed in the Accusation against
23 Pharmacist License Number RPH 81734 issued to Sheida Elizabeth Ketabchi, then Sheida
24 Elizabeth Ketabchi shall be prohibited from serving as a manager, administrator, owner, member,
25 officer, director, associate, or partner of a licensee for five years if Pharmacist License Number
26 RPH 81734 is placed on probation or until Pharmacist License Number RPH 81734 is reinstated
27 if it is revoked.

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. Revoking or suspending Pharmacist License Number RPH 81734 issued to Sheida Elizabeth Ketabchi;
2. Ordering Sheida Elizabeth Ketabchi 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;
3. Prohibiting Sheida Elizabeth Ketabchi from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacist License Number RPH 81734 is placed on probation or until Pharmacist License Number RPH 81734 is reinstated if Pharmacist License Number RPH 81734 issued to Sheida Elizabeth Ketabchi is revoked; and
4. Taking such other and further action as deemed necessary and proper.

DATED: 11/14/2023

Sodergren,
Anne@DCA

Digitally signed by Sodergren,
Anne@DCA
Date: 2023.11.14 17:02:26 -08'00'

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

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