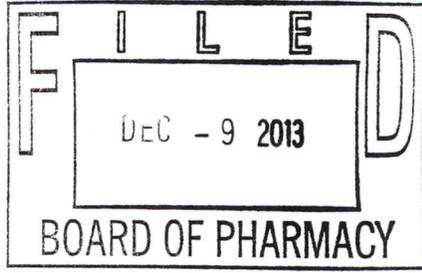


# 103192

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STATE OF NEW JERSEY  
DEPARTMENT OF LAW & PUBLIC SAFETY  
DIVISION OF CONSUMER AFFAIRS  
STATE BOARD OF PHARMACY

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IN THE MATTER OF THE PERMIT OF  
Jacobs Pharmacy  
Permit No.28RS00650600  
TO OPERATE AS A PHARMACY  
IN THE STATE OF NEW JERSEY

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**Administrative Action**  
  
CERTIFICATION OF  
KIM D. RINGLER,  
DEPUTY ATTORNEY GENERAL

KIM D. RINGLER, Deputy Attorney General, certifies and states:

1. I am an attorney-at-law of the State of New Jersey and a Deputy Attorney General assigned to handle the above-captioned matter. As such, I am fully familiar with the matters stated herein. The following information and documents are submitted in support of the Attorney General's Order to Show Cause seeking the temporary suspension of the permit and the CDS registration

of Jacobs Pharmacy ("Respondent") returnable before the State Board of Pharmacy (the "Board").

2. Attached hereto as Ringler Exhibit A is a true and complete copy of the Civil Action Consent Order in Estate of Jacob Boadu v. Kofi Yeboah, the case pending in Superior Court, Essex County, Docket No. ESX-L-7473-13 which was filed with the Court on November 15, 2013.

3. Attached hereto as Ringler Exhibit B is a true and complete copy of the public access New Jersey Courts filing docket pertaining to the above case.

4. Attached as Ringler Exhibit C are 303 photographs provided to me by counsel to Mr. Yeboah depicting the shelves of Jacobs Pharmacy after removal of the prescription medications and subsequently after the addition of prescription medications. The photographs are on numbered pages 1 - 76;

5. In further support of this application are the Certification of Joanne Leone, Deputy Executive Director of the New Jersey State Board of Nursing, and the Certification of Anthony Rubinaccio appended to which are Rubinaccio Exhibit A, Written Statement of Kofi Yeboah dated November 18, 2013; Rubinaccio Exhibit B, Letter of September 24, 2013 from the Board; Rubinaccio Exhibit C, Notice Of Change Of Pharmacist In Charge dated October 3, 2013 signed by Serwah-Boadu; Rubinaccio

Exhibit D, Notice Of Change Of Pharmacist In Charge dated October 3, 2013 signed by Yeboah, and Rubinaccio Exhibit E, Notice Of Change Of Pharmacist In Charge dated October 29, 2013.

6. The Verified Complaint in this matter is based upon the facts as set forth in the information contained in this and the other certifications and exhibits. The Verified Complaint will be filed contemporaneously with the filing of the application for an Order to Show Cause why the permit to operate a pharmacy in the State of New Jersey and the New Jersey CDS registration of Jacobs Pharmacy should not be immediately temporarily suspended, and for such other relief deemed appropriate, pursuant to N.J.S.A. 45:1-22 pending a plenary hearing on the Administrative Complaint.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

  
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Kim D. Ringler,  
Deputy Attorney General

Dated: 12/6, 2013