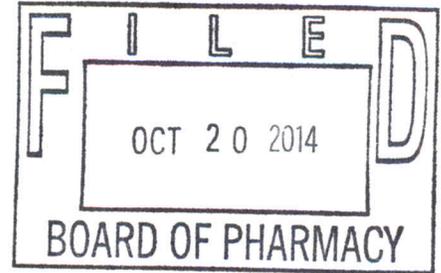


JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY
Division of Law
124 Halsey Street
P.O. Box 45029
Newark, New Jersey 07101



By: Joshua M. Bengal
Deputy Attorney General
Tel. (973) 648-7093
Joshua.Bengal@lps.state.nj.us

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

IN THE MATTER OF THE SUSPENSION
OR REVOCATION OF THE LICENSE TO
PRACTICE PHARMACY OF

VLADIMIR KLEYMAN
License No.: 28RI02503500

AND THE SUSPENSION OR REVOCATION
OF THE PHARMACY PERMIT OF

PRESCRIPTIONS R US, LLC
Pharm. Permit No.: 28RS00702300

Administrative Action

**ORDER TO SHOW CAUSE
NOTICE OF HEARING AND
NOTICE TO FILE ANSWER**

TO: Vladimir Kleyman
and
Prescriptions R Us, LLC
c/o Vladimir Kleyman, R.P.
3 Cathedral Drive
Lakewood, New Jersey 08701

This matter was opened to the New Jersey State Board of Pharmacy, by way of Verified Administrative Complaint, with supporting Brief and certified exhibits of John J. Hoffman, Acting Attorney General of New Jersey, by Joshua M. Bengal,

Deputy Attorney General, on notice to Respondents, Vladimir Kleyman and Prescriptions R Us, LLC ("PRU"), care of Vladimir Kleyman, Registered Pharmacist in Charge and part owner of PRU, seeking the temporary suspension of Respondent Kleyman's license to practice pharmacy in the State of New Jersey and the temporary suspension of the Pharmacy Permit held by Respondent PRU, and for such other relief as the Board deems appropriate, pursuant to the authority conferred upon it by N.J.S.A. 45:1-14 et seq., N.J.S.A. 45:1-45 et seq. and N.J.S.A. 45:14-40 et seq. In the Verified Administrative Complaint it is alleged that Respondents Kleyman and PRU committed serious violations of the statutes governing the practice of pharmacists and pharmacies licensed or permitted in the State of New Jersey. It being further alleged that Respondent Kleyman's continued licensure and Respondent PRU's continued operation as a permitted pharmacy pending final disposition of the Verified Administrative Complaint presents a clear and imminent danger to the public health, safety, and welfare in accordance with N.J.S.A. 45:1-22, accordingly, for good cause shown,

IT IS ON THIS 20th DAY OF October, 2014,

ORDERED that Respondents, Vladimir Kleyman, individually or by an attorney, and Prescriptions R Us, LLC, by an attorney, show cause before the New Jersey State Board of Pharmacy, or its designated committee, on October 29, 2014 at 10:00

a.m., or as soon thereafter as the parties may be heard, at the State Office Building, 124 Halsey Street, Somerset Conference Room, 6th Floor, Newark, New Jersey, 07101, why an Order should not be entered temporarily suspending Respondent Kleyman's license to practice pharmacy and Respondent PRU's permit to operate as a pharmacy in the State of New Jersey and imposing such other penalties and restraints as the Board deems necessary pending a plenary hearing on the Attorney General's Verified Administrative Complaint; and it is

FURTHER ORDERED that a copy of this Order, the Verified Administrative Complaint, Brief, Certifications, and Exhibits, be served upon Respondents or their attorney(s) forthwith; and it is

FURTHER ORDERED that Respondents shall file a response to the Order to Show Cause by Friday, October 24, 2014, said responsive papers to include a list of all potential witnesses and evidence to be presented by Respondents. Said responsive papers are to be delivered to the New Jersey State Board of Pharmacy, 124 Halsey Street, 6th Floor, P.O. Box 45013, Newark, New Jersey, 07101, with a copy delivered at the same time to Joshua M. Bengal, Deputy Attorney General, Division of Law, 124 Halsey Street, P.O. Box 45029, Newark, New Jersey, 07101; and it is

FURTHER ORDERED that separate from the response to the Order to Show Cause, Respondents shall file an Answer to the charges contained within the Verified Administrative Complaint by Monday, November 10, 2014, said Answer to be delivered to the New Jersey State Board of Pharmacy, 124 Halsey Street, 6th Floor, P.O. Box 45013, Newark, New Jersey, 07101, with a copy delivered at the same time to Joshua M. Bengal, Deputy Attorney General, Division of Law, 124 Halsey Street, P.O. Box 45029, Newark, New Jersey, 07101; and it is

FURTHER ORDERED that Respondents' failure to respond to this Order to Show Cause, failure to file an Answer to the Verified Administrative Complaint, failure to appear before the New Jersey State Board of Pharmacy as herein indicated, or failure to appear for a formal plenary hearing on the remainder of the charges as required, will result in this matter being considered in Respondents' absence on the proofs presented and an Order may be entered against Respondents for any and all of the relief demanded in the Verified Administrative Complaint; and it is

FURTHER ORDERED that an admission of the charges set forth in the Verified Administrative Complaint will indicate that Respondents do not wish to contest the charges stated, rendering unnecessary any hearing in this matter. The case will then be presented to the State Board of Pharmacy within thirty (30) days

from the receipt of Respondents' Answer, or on an adjourned date, together with any written materials Respondents may wish to submit with the Answer in alleged mitigation of penalty, for a determination as to whether disciplinary sanctions, including suspension or revocation of the license to practice pharmacy held by Respondent Kleyman and the pharmacy permit held by Respondent PRU or other or lesser sanctions should be imposed and whether monetary penalties, attorneys' fees, and costs shall be assessed and, if so, the amount thereof pursuant to the authority conferred upon the Board by N.J.S.A. 45:1-14 et seq., N.J.S.A. 45:1-45 et seq. and N.J.S.A. 45:14-40 et seq.; and it is

FURTHER ORDERED that denial of the charges will result in a formal plenary hearing subsequent to the return date set forth herein which may be conducted by the Board or by an Administrative Law Judge who, upon notice to Respondents, will hear the Verified Administrative Complaint, including any amendments thereto, and consider the imposition of disciplinary sanctions with respect to Respondents' license, registration, and permit. Respondents may appear at the plenary hearing by an attorney and shall be afforded an opportunity at that time to make defense to any and all of the charges set forth in the Verified Administrative Complaint.

NEW JERSEY STATE BOARD OF PHARMACY

Thomas F.X. Bender, Jr. R.Ph.

By: _____

Thomas F.X. Bender, R.Ph.
President

KINDLY ADDRESS AN ORIGINAL AND ONE COPY OF RESPONDENTS' RESPONSIVE PAPERS AND ANSWER SPECIFICALLY RESPONDING TO EACH PARAGRAPH OF THE VERIFIED ADMINISTRATIVE COMPLAINT TO:

NEW JERSEY STATE BOARD OF PHARMACY
124 Halsey Street, 6th Floor
P.O. Box 45013
Newark, New Jersey 07101

and

JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY
ATTENTION: JOSHUA M. BENGAL, DAG
Division of Law
124 Halsey, 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
Tel: (973) 648-7093