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7 Attorneys for Complainant

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

11 In the Matter of the Accusation Against:
12 FLORA MONIK DIXON
13 8526 Saturn Street, #3
Los Angeles, CA 90035
14 Pharmacy Technician License No. TCH 64779
15 Respondent.

Case No. 3207

ACCUSATION

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17 Complainant alleges:

18 **PARTIES**

- 19 1. Virginia Herold (Complainant) brings this Accusation solely in her official
20 capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.
21 2. On or about August 31, 2005, the Board of Pharmacy (Board) issued
22 Pharmacy Technician License Number TCH 64779 to Flora Monik Dixon (Respondent). The
23 Pharmacy Technician License was in full force and effect at all times relevant to the charges
24 brought herein and will expire on July 31, 2009, unless renewed.

25 **JURISDICTION**

- 26 3. This Accusation is brought before the Board under the authority of the
27 following laws. All section references are to the Business and Professions Code unless otherwise
28 indicated.

1 **COST RECOVERY PROVISION**

2 8. Section 125.3 states, in pertinent part, that the Board may request the
3 administrative law judge to direct a licentiate found to have committed a violation or violations
4 of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case.

6 **CAUSE FOR DISCIPLINE**

7 (Unprofessional Conduct/Possession of a Controlled Substance)

8 9. Respondent is subject to disciplinary action under section 4301,
9 subdivision (j), and section 4060, for possessing a controlled substance. On or about December
10 1, 2005, police officers responded to a suspect's residence to arrest him for a parole violation.
11 Respondent was present at the suspect's residence. During a search of the suspect's residence,
12 one of the officers observed a bottle containing pills, with no prescription label visible, inside a
13 woman's purse. The officer asked Respondent if she had a prescription for the pills, and she
14 answered, "No." The officers arrested Respondent for violating Health and Safety Code section
15 11350, subdivision (a) [possession of a controlled substance]. The pills were later identified as
16 Hydrocodone-Acetaminophen. No criminal case was filed against Respondent as a result of this
17 arrest.

18 **PRAYER**

19 WHEREFORE, Complainant requests that a hearing be held on the matters herein
20 alleged, and that following the hearing, the Board issue a decision:

- 21 1. Revoking or suspending Pharmacy Technician License Number TCH
22 64779, issued to Flora Monik Dixon;
- 23 2. Ordering Flora Monik Dixon to pay the Board the reasonable costs of the
24 investigation and enforcement of this case, pursuant to Business and Professions Code section

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1 125.3; and

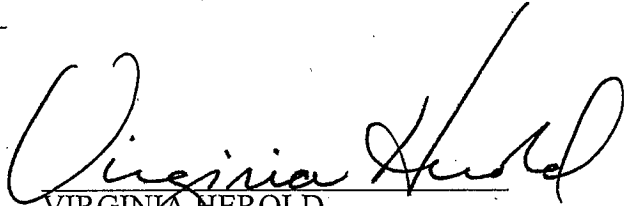
2 3. Taking such other and further action as deemed necessary and proper.

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4 DATED: 5/14/09

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VIRGINIA HEROLD
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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