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7
8 **BEFORE THE**
BOARD OF PHARMACY
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 3545

11 **CHRISTINA MARIE GODINEZ**
12 611 Walnut Lane
Hollister, CA 95023
13 **Pharmacy Technician Registration No. TCH**
86747

A C C U S A T I O N

14 Respondent.

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17 Complainant alleges:

18 **PARTIES**

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

21 2. On or about October 3, 2008, the Board of Pharmacy issued Pharmacy Technician
22 Registration Number TCH 86747 to Christina Marie Godinez (Respondent). The Pharmacy
23 Technician Registration will expire on March 31, 2012, unless renewed.

24 **JURISDICTION**

25 3. This Accusation is brought before the Board of Pharmacy (Board), Department of
26 Consumer Affairs, under the authority of the following laws. All section references are to the
27 Business and Professions Code unless otherwise indicated.

1 The circumstances are described in paragraph 12, above.

2 FIRST CAUSE FOR DISCIPLINE

3 (Unprofessional Conduct-Conviction)

4 14. Respondent is subject to disciplinary action under sections 4301(l) and 490 of the
5 code in that respondent was convicted of a crime that is substantially related to the duties,
6 functions, or qualifications of pharmacy technician. The circumstances are described in
7 paragraphs 10-11, above.

8 SECOND CAUSE FOR DISCIPLINE

9 (Unprofessional Conduct-Conviction)

10 15. Respondent is subject to disciplinary action under sections 4301(l) and 490 of the
11 code in that respondent was convicted of a crime that is substantially related to the duties,
12 functions, or qualifications of pharmacy technician. The circumstances are described in
13 paragraphs 12-13, above.

14 THIRD CAUSE FOR DISCIPLINE

15 (Unprofessional Conduct-Moral Turpitude, Dishonesty, Fraud, and/or Deceit)

16 16. Respondent is subject to disciplinary action under section 4301 (f) of the code in that
17 Respondent committed acts of moral turpitude, dishonesty, and/or deceit. The circumstances are
18 described in paragraph 10, above.

19 FOURTH CAUSE FOR DISCIPLINE

20 (Unprofessional Conduct-Moral Turpitude, Dishonesty, Fraud, and/or Deceit)

21 17. Respondent is subject to disciplinary action under section 4301 (f) of the code in that
22 Respondent committed acts of moral turpitude, dishonesty, and/or deceit. The circumstances are
23 described in paragraph 12, above.

24 PRAYER

25 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
26 and that following the hearing, the Board of Pharmacy issue a decision:

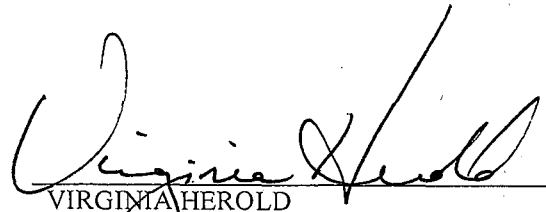
27 1. Revoking or suspending Pharmacy Technician Registration Number TCH 86747,
28 issued to Christina Marie Godinez.

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2. Ordering Christina Marie Godinez 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. Taking such other and further action as deemed necessary and proper.

DATED: 6/3/10



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

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