

1 KAMALA D. HARRIS
Attorney General of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
3 JOSHUA A. ROOM
Deputy Attorney General
4 State Bar No. 214663
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 703-1299
6 Facsimile: (415) 703-5480
Attorneys for Complainant

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. 3941

11 **JORGE SALDANA VALADEZ**
12 **25903 Gettysburg Avenue**
13 **Hayward, CA 94545**

A C C U S A T I O N

14 **Pharmacy Technician License No. TCH 87769**

15 Respondent.

16 Complainant alleges:

17 **PARTIES**

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

20 2. On or about August 31, 2009, the Board of Pharmacy issued Pharmacy Technician
21 License No. TCH 87769 to Jorge Saldana Valadez (Respondent). The License was in full force
22 and effect at all times relevant herein and will expire on September 30, 3012, unless renewed.

23
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 (Code) unless otherwise indicated.

1 THIRD CAUSE FOR DISCIPLINE

2 (Furnishing of Dangerous Drug(s) Without Prescription)

3 17. Respondent is subject to discipline under section 4301(j) and/or (o) and/or section
4 4059 of the Code, in that Respondent, as described in paragraphs 12 to 14 above, furnished to
5 himself or another, and/or conspired to furnish, and/or assisted or abetted furnishing of, one or
6 more dangerous drugs, without a valid prescription.

7
8 FOURTH CAUSE FOR DISCIPLINE

9 (Unprofessional Conduct)

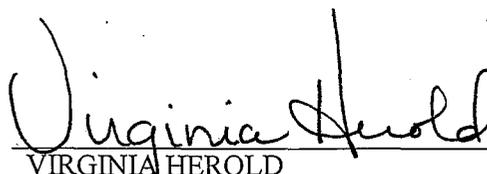
10 18. Respondent is subject to discipline under section 4301 of the Code in that
11 Respondent, as described in paragraphs 12 to 17 above, engaged in unprofessional conduct.

12
13 PRAYER

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

- 16 1. Revoking or suspending Pharmacy Technician License No. TCH 87769, issued to
- 17 Jorge Saldana Valadez (Respondent);
- 18 2. Ordering Respondent to pay the Board the reasonable costs of the investigation and
- 19 enforcement of this case, pursuant to Business and Professions Code section 125.3;
- 20 3. Taking such other and further action as is deemed necessary and proper.

21
22 DATED: 5/27/11

23 

24 VIRGINIA HEROLD
25 Executive Officer
26 Board of Pharmacy
27 Department of Consumer Affairs
28 State of California
Complainant

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