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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. 4440
11 <b>KELLY M. MURRAY</b>	
12 <b>aka KELLY MARIE RAMIREZ</b>	
13 <b>135 Sunshine Drive</b>	<b>A C C U S A T I O N</b>
14 <b>Pacifica, CA 94044</b>	
15 <b>Pharmacy Technician License No. TCH 51924</b>	
16 Respondent.	

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 September 29, 2003, the Board of Pharmacy issued Pharmacy Technician  
22 License No. TCH 51924 to Kelly M. Murray aka Kelly Marie Ramirez (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 August 31, 2013, unless renewed.

25 JURISDICTION

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





1 d. On or about March 2, 2012, the Court ordered that Respondent was accepted  
2 into the Pathways treatment program, and further ordered that the imposition of sentence was  
3 suspended in favor of a period of supervised probation of three (3) years on terms and conditions  
4 including 149 days in county jail (149 days credit for time served/good time/work time), drug and  
5 alcohol testing, abstention from drug and alcohol use, treatment/therapy as directed, 114 hours of  
6 domestic violence counseling, search and seizure conditions, and fines, fees, and assessments.

7 SECOND CAUSE FOR DISCIPLINE

8 (Unprofessional Conduct)

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

11  
12 PRAYER

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

- 15 1. Revoking or suspending Pharmacy Technician License No. TCH 51924, issued to  
16 Kelly M. Murray aka Kelly Marie Ramirez (Respondent);
- 17 2. Ordering Respondent to pay the Board the reasonable costs of the investigation and  
18 enforcement of this case, pursuant to Business and Professions Code section 125.3;
- 19 3. Taking such other and further action as is deemed necessary and proper.

20  
21 DATED: 2/19/13

22 

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

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