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

11 In the Matter of the Accusation Against:

Case No. 4640

12 **GARA L. GODBOLD**
13 **409 Lewis Lane**
14 **Pacifica, CA 94044**
15 **Pharmacy Technician**
Registration No. TCH 61514

A C C U S A T I O N

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

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

22 2. On or about March 4, 2005, the Board of Pharmacy issued Pharmacy Technician
23 Registration Number TCH 61514 to Gara L. Godbold (Respondent). The Pharmacy Technician
24 Registration was in full force and effect at all times relevant to the charges brought in this
25 Accusation and will expire on January 31, 2015, unless renewed.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board of Pharmacy (Board), Department of
28 Consumer Affairs, under the authority of the following laws. All section references are to the

1 Business and Professions Code unless otherwise indicated.

2 4. Section 4300 of the Code states, in part:

3 "(a) Every license issued may be suspended or revoked.

4 "(b) The board shall discipline the holder of any license issued by the board, whose default
5 has been entered or whose case has been heard by the board and found guilty, by any of the
6 following methods:

7 "(1) Suspending judgment.

8 "(2) Placing him or her upon probation.

9 "(3) Suspending his or her right to practice for a period not exceeding one year.

10 "(4) Revoking his or her license.

11 "(5) Taking any other action in relation to disciplining him or her as the board in its
12 discretion may deem proper."

13 5. Section 4300.1 of the Code states:

14 "The expiration, cancellation, forfeiture, or suspension of a board-issued license by
15 operation of law or by order or decision of the board or a court of law, the placement of a license
16 on a retired status, or the voluntary surrender of a license by a licensee shall not deprive the board
17 of jurisdiction to commence or proceed with any investigation of, or action or disciplinary
18 proceeding against, the licensee or to render a decision suspending or revoking the license."

19 STATUTORY PROVISIONS

20 6. Section 4301 of the Code states, in part:

21 "The board shall take action against any holder of a license who is guilty of unprofessional
22 conduct or whose license has been procured by fraud or misrepresentation or issued by mistake.

23 Unprofessional conduct shall include, but is not limited to, any of the following:

24 ...

25 "(f) The commission of any act involving moral turpitude, dishonesty, fraud, deceit, or
26 corruption, whether the act is committed in the course of relations as a licensee or otherwise, and
27 whether the act is a felony or misdemeanor or not.

28 ...

1 **FIRST CAUSE FOR DISCIPLINE**
2 **(Unprofessional Conduct: Dishonesty, Fraud, or Deceit)**
3 **(Bus. & Prof. Code § 4301, subd. (f))**

4 10. Respondent has subjected her pharmacy technician registration to discipline under
5 Code section 4301, subdivision (f) (Unprofessional Conduct: Dishonesty, Fraud, or Deceit). The
6 circumstances are set forth in paragraph 9, above.

7 **SECOND CAUSE FOR DISCIPLINE**
8 **(Unprofessional Conduct: Dangerous Use of Dangerous Drug)**
9 **(Bus. & Prof. Code § 4301, subd. (h))**

10 11. Respondent has subjected her pharmacy technician registration to discipline under
11 Code section 4301, subdivision (h) (Dangerous Use of Dangerous Drug). The circumstances are
12 set forth in paragraph 9, above.

13 **PRAYER**

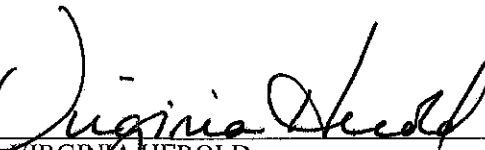
14 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this
15 Accusation, and that following the hearing, the Board of Pharmacy issue a decision:

16 1. Revoking or suspending Pharmacy Technician Registration Number TCH 61514,
17 issued to Gara L. Godbold;

18 2. Ordering Gara L. Godbold to pay the Board of Pharmacy the reasonable costs of the
19 investigation and enforcement of this case, pursuant to Business and Professions Code section
20 125.3;

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

22 DATED: 10/21/13


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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