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

12 In the Matter of the Accusation Against:

Case No. 4886

13 **IAN MICHAEL BRIDGES**  
3844 Mayfield Ave.  
La Crescenta. CA 91214

**A C C U S A T I O N**

14 Pharmacy Technician Registration Number  
15 TCH 125167

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 (Board).

22 2. On or about October 16, 2012, the Board issued Pharmacy Technician Registration  
23 No. TCH 125167 to Ian Michael Bridges (Respondent). The Pharmacy Technician license, which  
24 was in full force and effect at all times relevant to the charges brought herein, and will expire on  
25 July 31, 2018, unless renewed.

26 **JURISDICTION**

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

1 STATUTORY PROVISIONS

2 4. Section 490 states, in pertinent part:

3 “(a) In addition to any other action that a board is permitted to take against a licensee, a  
4 board may suspend or revoke a license on the ground that the licensee has been convicted of a  
5 crime, if the crime is substantially related to the qualifications, functions, or duties of the business  
6 or profession for which the license was issued.

7 “(b) Notwithstanding any other provision of law, a board may exercise any authority to  
8 discipline a licensee for conviction of a crime that is independent of the authority granted under  
9 subdivision (a) only if the crime is substantially related to the qualifications, functions, or duties  
10 of the business or profession for which the licensee's license was issued.

11 “(c) A conviction within the meaning of this section means a plea or verdict of guilty or a  
12 conviction following a plea of nolo contendere. Any action that a board is permitted to take  
13 following the establishment of a conviction may be taken when the time for appeal has elapsed, or  
14 the judgment of conviction has been affirmed on appeal, or when an order granting probation is  
15 made suspending the imposition of sentence, irrespective of a subsequent order under the  
16 provisions of Section 1203.4 of the Penal Code.”

17 5. Section 493 states:

18 "Notwithstanding any other provision of law, in a proceeding conducted by a board within  
19 the department pursuant to law to deny an application for a license or to suspend or revoke a  
20 license or otherwise take disciplinary action against a person who holds a license, upon the  
21 ground that the applicant or the licensee has been convicted of a crime substantially related to the  
22 qualifications, functions, and duties of the licensee in question, the record of conviction of the  
23 crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact,  
24 and the board may inquire into the circumstances surrounding the commission of the crime in  
25 order to fix the degree of discipline or to determine if the conviction is substantially related to the  
26 qualifications, functions, and duties of the licensee in question.

27 As used in this section, 'license' includes 'certificate,' 'permit,' 'authority,' and 'registration.'"

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1           6.     Section 4300, subdivision (a), of the Code provides that every license issued by the  
2 Board may be suspended or revoked.

3           7.     Section 4300.1 provides that the expiration, cancellation, forfeiture, or suspension of  
4 a board-issued license by operation of law or by order or decision of the board or a court of law,  
5 the placement of a license on a retired status, or the voluntary surrender of a license by a licensee  
6 shall not deprive the board of jurisdiction to commence or proceed with any investigation of, or  
7 action or disciplinary proceeding against, the licensee or to render a decision suspending or  
8 revoking the license.

9           8.     Section 4301 states, in pertinent part:

10           “The board shall take action against any holder of a license who is guilty of unprofessional  
11 conduct or whose license has been procured by fraud or misrepresentation or issued by mistake.  
12 Unprofessional conduct shall include, but is not limited to, any of the following:

13           ...

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

17           ...

18           “(l) The conviction of a crime substantially related to the qualifications, functions, and  
19 duties of a licensee under this chapter. The record of conviction of a violation of Chapter 13  
20 (commencing with Section 801) of Title 21 of the United States Code regulating controlled  
21 substances or of a violation of the statutes of this state regulating controlled substances or-----  
22 dangerous drugs shall be conclusive evidence of unprofessional conduct. In all other cases, the  
23 record of conviction shall be conclusive evidence only of the fact that the conviction occurred.  
24 The board may inquire into the circumstances surrounding the commission of the crime, in order  
25 to fix the degree of discipline or, in the case of a conviction not involving controlled substances  
26 or dangerous drugs, to determine if the conviction is of an offense substantially related to the  
27 qualifications, functions, and duties of a licensee under this chapter. A plea or verdict of guilty or  
28 a conviction following a plea of nolo contendere is deemed to be a conviction within the meaning

1 of this provision. The board may take action when the time for appeal has elapsed, or the  
2 judgment of conviction has been affirmed on appeal or when an order granting probation is made  
3 suspending the imposition of sentence, irrespective of a subsequent order under Section 1203.4 of  
4 the Penal Code allowing the person to withdraw his or her plea of guilty and to enter a plea of not  
5 guilty, or setting aside the verdict of guilty, or dismissing the accusation, information, or  
6 indictment.

7 ...

8 “(o) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the  
9 violation of or conspiring to violate any provision or term of this chapter or of the applicable  
10 federal and state laws and regulations governing pharmacy, including regulations established by  
11 the board or by any other state or federal regulatory agency.

12 “(p) Actions or conduct that would have warranted denial of a license.”

13 **REGULATORY PROVISION**

14 9. California Code of Regulations, title 16, section 1770, states:

15 "For the purposes of denial, suspension, or revocation of a license pursuant to Division 1.5  
16 (commencing with Section 475) of the Business and Professions Code, a crime or act shall be  
17 considered to be substantially related to the qualifications, functions or duties of a licensed  
18 psychiatric technician if to a substantial degree it evidences present or potential unfitness of a  
19 licensed psychiatric technician to perform the functions authorized by his license in a manner  
20 consistent with the public health, safety, or welfare . . ."

21 **COST RECOVERY**

22 10. Section 125.3 provides that a Board may request the administrative law judge to  
23 direct a licentiate found to have committed a violation or violations of the licensing act to pay a  
24 sum not to exceed the reasonable costs of the investigation and enforcement of the case.

25 **FIRST CAUSE FOR DISCIPLINE**

26 **(Convictions of Substantially Related Crimes)**

27 11. Respondent is subject to disciplinary action under sections 4301, subdivisions (f), (l),  
28 (o) and (p), and 490, in conjunction with California Code of Regulations, title 16, section 1770, in

1 that Respondent has been convicted of crimes substantially related to the qualifications, functions  
2 or duties of a pharmacy technician, as follows:

3 a. On or about April 15, 2015, after pleading nolo contendere, Respondent was  
4 convicted of one misdemeanor count of violating Penal Code section 415(2) [maliciously and  
5 willfully disturbing another by loud and unreasonable noise] in the criminal proceeding entitled  
6 *The People of the State of California v. Ian Michael Bridges* (Super. Ct. Los Angeles County,  
7 2013, No. 2PS03797). The Court sentenced Respondent to serve nine (9) days in jail (with credit  
8 for five days actually served and four days for good time/work time), and payment of fines and  
9 fees in the amount of \$220.00.

10 b. The circumstances surrounding the conviction are that on or about November  
11 22, 2012, Respondent was arrested for resisting a public or peace officer at the Rose Bowl in  
12 Pasadena, CA.

13 c. On or about April 17, 2013, after pleading nolo contendere, Respondent was  
14 convicted of one misdemeanor count of violating Penal Code section 245(a)(2) [assault with a  
15 firearm] in the criminal proceeding entitled *The People of the State of California v. Ian Bridges*  
16 (Super. Ct. Los Angeles County, 2013, No. GA088859). The Court sentenced Respondent to  
17 three (3) years formal probation, one (1) day in jail (with credit for one day served), and payment  
18 of fines and fees in the amount of \$235.00. Respondent was also ordered to take all prescribed  
19 medication and attend psychiatric counseling.

20 d. The circumstances surrounding the conviction are that on or about January 20,  
21 2013, Respondent assaulted his father with a firearm.

22 **SECOND CAUSE FOR DISCIPLINE**

23 **(Acts Involving Moral Turpitude, Dishonesty, Fraud, Deceit, or Corruption)**

24 12. Respondent is subject to disciplinary action under sections 4300 and 4301,  
25 subdivision (f), on the grounds of unprofessional conduct, in that Respondent committed acts  
26 involving moral turpitude, dishonesty, fraud, deceit, or corruption. Complainant refers to and by  
27 this reference incorporates the allegations set forth above in paragraphs 11(c) and (d), as though  
28 set forth fully.

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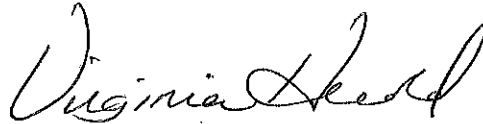
**PRAYER**

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

1. Revoking or suspending Pharmacy Technician Registration No. TCH 125167, issued to Michael Ian Bridges;
2. Ordering Michael Ian Bridges to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to section 125.3; and
3. Taking such other and further action as deemed necessary and proper.

DATED: \_\_\_\_\_

10/7/17



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