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

10 In the Matter of the Accusation Against:

Case No. 5401

11 **SHAO-LUN LEE**
12 **1022 Whitebrick Drive**
13 **San Jose, CA 95129**

ACCUSATION

14 **Pharmacist License No. RPH 48518**

15 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 March 7, 1996, the Board of Pharmacy issued Pharmacist License
22 Number RPH 48518 to Shao-Lun Lee (Respondent). The Pharmacist License was in full force
23 and effect at all times relevant to the charges brought herein and will expire on December 31,
24 2017, 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 FIRST CAUSE FOR DISCIPLINE

2 (Conviction of Substantially Related Crime(s))

3 10. Respondent is subject to disciplinary action under Code section 4301, subsection (l),
4 in that he has been convicted of crimes substantially related to the qualifications, functions, and
5 duties of a licensee. The circumstances are as follows:

6 11. On or about April 9, 2015, in Santa Clara Superior Court case number C1372122,
7 Respondent was convicted of having violated California Penal Code section 415(2) (disturbing
8 the peace). The conviction was based on an incident which occurred on or about November 4,
9 2013, during which Respondent attacked his spouse, physically restrained her and threatened her
10 with a knife. Pursuant to his plea on April 9, 2015, Respondent was ordered to participate in
11 domestic violence counseling and was ordered to stay away from his spouse. Respondent was
12 sentenced on or about September 15, 2015. At that time, the court issued a three-year domestic
13 violence protective order in order to protect Respondent's spouse.

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15 SECOND CAUSE FOR DISCIPLINE

16 (Unprofessional Conduct)

17 12. Respondent is subject to disciplinary action under Code section 4301 in that he has
18 engaged in unprofessional conduct, as described above in paragraph 10.

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22 PRAYER

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

25 1. Revoking or suspending Pharmacist License Number RPH 48518, issued to Shao-Lun
26 Lee (Respondent);

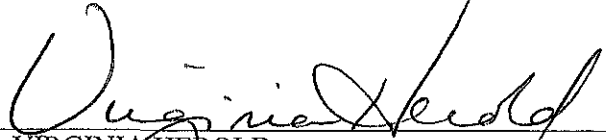
27 2. Ordering Respondent to pay the Board the reasonable costs of the investigation and
28 enforcement of this case, pursuant to Business and Professions Code section 125.3;

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

DATED: _____

1/22/16



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