

1 XAVIER BECERRA  
Attorney General of California  
2 LINDA K. SCHNEIDER  
Senior Assistant Attorney General  
3 THOMAS L. RINALDI  
Supervising Deputy Attorney General  
4 State Bar No. 206911  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2541  
6 Facsimile: (213) 897-2804

7 *Attorneys for Complainant*

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. 5695

13 **TYLER STEPHEN BASS**  
301 Knob Hill, #27  
Redondo Beach, CA 90277

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

14 Pharmacy Technician Registration  
15 No. TCH 143284

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 November 7, 2014, the Board issued Pharmacy Technician Registration  
23 No. TCH 143284 to Tyler Stephen Bass (Respondent). The Pharmacy Technician Registration  
24 was in full force and effect at all times relevant to the charges brought herein and will expire on  
25 December 31, 2017, 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           4.     Section 4060 states:

2            “No person shall possess any controlled substance, except that furnished to a person upon  
3 prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor  
4 pursuant to Section 3640.7, or furnished pursuant to a drug order issued by a certified nurse-  
5 midwife pursuant to Section 2746.51, a nurse practitioner pursuant to Section 28361.1, or a  
6 physician assistant pursuant to Section 3502.1, or naturopathic doctor pursuant to Section 3640.5,  
7 or a pharmacist pursuant to either subparagraph (D) of paragraph (4) of, or clause (iv) of  
8 subparagraph (A) of paragraph (5) of, subdivision (a) of Section 4052. This section shall not  
9 apply to the possession of any controlled substance by a manufacturer, wholesaler, pharmacy,  
10 pharmacist, physician, podiatrist, dentist, optometrist, veterinarian, naturopathic doctor, certified  
11 nurse-midwife, nurse practitioner, or physician assistant, when in stock in containers correctly  
12 labeled with the name and address of the supplier or producer.

13            “Nothing in this section authorizes a certified nurse-midwife, a nurse practitioner, a  
14 physician assistant, or a naturopathic doctor, to order his or her own stock of dangerous drugs and  
15 devices.”

16           5.     Section 4300 provides in pertinent part, that every license issued by the Boards is  
17 subject to discipline, including suspension or revocation.

18           6.     Section 4300.1 states:

19            “The expiration, cancellation, forfeiture, or suspension of a board-issued license by  
20 operation of law or by order or decision of the board or a court of law, the placement of a license  
21 on a retired status, or the voluntary surrender of a license by a licensee shall not deprive the board  
22 of jurisdiction to commence or proceed with any investigation of, or action or disciplinary  
23 proceeding against, the licensee or to render a decision suspending or revoking the license.”

24           7.     Section 4301 states, in pertinent part:

25            “The board shall take action against any holder of a license who is guilty of unprofessional  
26 conduct or whose license has been issued by mistake. Unprofessional conduct shall include, but is  
27 not limited to, any of the following:

28            .....



1 that on or about June 10, 2015, Respondent was in possession of heroin, a controlled substance /  
2 dangerous drug. The circumstances surrounding the arrest are that on or about June 10, 2015, a  
3 Torrance Police Officer observed Respondent crossing the roadway causing several vehicles to  
4 brake to avoid hitting him. The officer followed Respondent to a motel where he was detained.  
5 Respondent explained to the officer that he was searching for an individual who he had sold a cell  
6 phone to and had used counterfeit money to pay him. During a search of Respondent's person,  
7 the officer found a folded up piece of foil with a black tar-like ball consistent with the appearance  
8 of heroin from his pants pocket. When asked how long he had been a heroin user, Respondent  
9 stated that he had just started again due to the stress of learning his girlfriend had developed HIV.  
10 Officers searched the room where Respondent was staying with his girlfriend and found fifty  
11 twenty dollar bills consistent with counterfeit currency. When asked who the currency belonged  
12 to, Respondent stated that the counterfeit bills belonged to him.

13 **SECOND CAUSE FOR DISCIPLINE**

14 **(Acts Involving Dishonesty, Fraud, or Deceit)**

15 12. Respondent is subject to disciplinary action under section 4301, subdivision (f), in  
16 that Respondent committed acts involving dishonesty, fraud, or deceit with the intent to  
17 substantially benefit himself, or substantially injure another. Complainant refers to, and by this  
18 reference incorporates, the allegations set forth above in paragraph 11, as though set forth fully.

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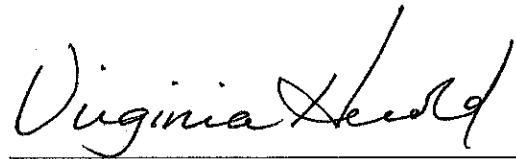
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PRAYER

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

1. Revoking or suspending Pharmacy Technician Registration No. TCH 143284, issued to Tyler Stephen Bass;
2. Ordering Tyler Stephen Bass to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,
3. Taking such other and further action as deemed necessary and proper.

DATED: 4/13/17



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

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