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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. 5706

11 **VERONICA ESTELA LOPEZ RUIZ**
12 **10394 N. Stelling Road # A**
13 **Cupertino, CA 95014**

A C C U S A T I O N

14 **Pharmacy Technician License No. TCH 129065**

15 Respondent.

16 Complainant alleges:

17 PARTIES

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

20 2. On or about March 4, 2013, the Board of Pharmacy issued Pharmacy Technician
21 License Number TCH 129065 to Veronica Estela Lopez Ruiz (Respondent). The Pharmacy
22 Technician License was in full force and effect at all times relevant to the charges brought herein
23 and will expire on April 30, 2018, unless renewed.

24 JURISDICTION

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

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1 THIRD CAUSE FOR DISCIPLINE

2 (Possession of Controlled Substance(s))

3 20. Respondent is subject to discipline under section 4301(j) and/or (o) and/or section
4 4060 of the Code, and/or Health and Safety Code section 11350, in that Respondent, as described
5 in paragraph 17 above, possessed, conspired to possess, and/or assisted in or abetted possession
6 of, a controlled substance, without a prescription.

7
8 FOURTH CAUSE FOR DISCIPLINE

9 (Unprofessional Conduct)

10 21. Respondent is subject to discipline under section 4301 of the Code in that
11 Respondent, as described in paragraphs 17 to 20 above, engaged in unprofessional conduct.

12
13 PRAYER

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

- 16 1. Revoking or suspending Pharmacy Technician License Number TCH 129065, issued
17 to Veronica Estela Lopez Ruiz (Respondent);
- 18 2. Ordering Respondent to pay the Board the reasonable costs of the investigation and
19 enforcement of this case, pursuant to Business and Professions Code section 125.3;
- 20 3. Taking such other and further action as is deemed necessary and proper.

21
22 DATED: _____

6/10/16

Virginia Herold

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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