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

12 In the Matter of the Statement of Issues Against:

Case No. 3371

13 YVONNE ANNE DIXSON
82-640 Miles Avenue #7
14 Indio, CA 92201

STATEMENT OF ISSUES

15 Respondent.

16 Complainant alleges:

17 **PARTIES**

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

20 2. On July 2, 2008, the Board received an Application for Registration as a
21 Pharmacy Technician from Respondent Yvonne Anne Dixson. On May 15, 2008, Respondent
22 certified under penalty of perjury to the truthfulness of all statements, answers, and
23 representations in the application. The Board denied the application on January 7, 2009. The
24 Board received Respondent's request for an administrative hearing on February 18, 2009.

25 **JURISDICTION**

26 3. This Statement of Issues is brought before the Board of Pharmacy, 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.

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SECOND CAUSE FOR DENIAL OF APPLICATION

(Commission of Acts Involving Dishonesty, Fraud and Deceit)

8. Respondent's application is subject to denial under section 480 subdivision (a)(2) of the Code in that between November 8, 1994, and December 4, 1994, Respondent knowingly defrauded two Winslow, Arizona grocery stores out of currency and goods by passing 22 checks on a closed checking account, acts involving dishonesty, fraud and deceit with the intent to substantially benefit herself. Such acts are substantially related to the qualifications, duties, and functions of a pharmacy technician.

THIRD CAUSE FOR DENIAL OF APPLICATION

(August 23, 1999 Criminal Conviction for Voluntary Manslaughter)

9. Respondent's application is subject to denial under section 480, subdivision (a)(1) of the Code in that she was convicted of a crime that is substantially related to the qualifications, duties, and functions of a pharmacy technician. The circumstances are as follows:

a. On or about August 23, 1999, in a criminal proceeding entitled *United States of America v. Yvonne Anne Dixon*, in U.S. District Court, Arizona (Prescott Division), case number 99CR00023, Respondent was convicted of violating 18 U.S.C. sections 1153 and 1112, subdivision (a), voluntary manslaughter committed on an Indian reservation, a felony.

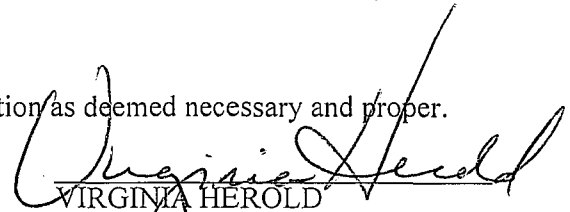
b. As a result of the conviction, Respondent was sentenced to 51 months incarceration in the Bureau of Prisons, followed by 36 months supervised release.

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. Denying the application of Yvonne Anne Dixon for a Pharmacy Technician registration;
- 2. Taking such other and further action as deemed necessary and proper.

DATED: 7/8/09


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