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

11 In the Matter of the Statement of Issues Against:

Case No. 5508

12 **JESUS HERMIDA CRUZ,**  
**aka JESUS CRUZ**  
13 **aka JESUS ADALIT ANDRADE**  
**aka ADALIT ANDRADE**  
14

**STATEMENT OF ISSUES**

15 Pharmacy Technician Registration Applicant

16 Respondent.  
17

18 Complainant alleges:

19 **PARTIES**

20 1. Virginia Herold ("Complainant") brings this Statement of Issues solely in her official  
21 capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs  
22 ("Board").

23 2. On or about August 7, 2014, the Board received an application for a Pharmacy  
24 Technician Registration from Jesus Hermida Cruz, aka Jesus Crus, aka Jesus Adalit Andrade aka  
25 Adalit Andrade ("Respondent"). On or about July 21, 2014, Jesus Hermida Cruz certified under  
26 penalty of perjury to the truthfulness of all statements, answers, and representations in the  
27 application. The Board denied the application on May 29, 2015.

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1 **JURISDICTION**

2 3. This Statement of Issues is brought before the Board under the authority of the  
3 following laws. All section references are to the Business and Professions Code ("Code") unless  
4 otherwise indicated.

5 4. Section 4300 of the Code states:

6 . . . .

7 (c) The board may refuse a license to any applicant guilty of unprofessional  
8 conduct. The board may, in its sole discretion, issue a probationary license to any  
9 applicant for a license who is guilty of unprofessional conduct and who has met all  
10 other requirements for licensure. The board may issue the license subject to any  
11 terms or conditions not contrary to public policy.

10 . . . .

11 **STATUTORY PROVISIONS**

12 5. Section 480 of the Code states, in pertinent part:

13 (a) A board may deny a license regulated by this code on the grounds that the  
14 applicant has one of the following:

15 (1) Been convicted of a crime. A conviction within the meaning of this section  
16 means a plea or verdict of guilty or a conviction following a plea of nolo  
17 contendere. Any action that a board is permitted to take following the establishment  
18 of a conviction may be taken when the time for appeal has elapsed, or the judgment  
19 of conviction has been affirmed on appeal, or when an order granting probation is  
20 made suspending the imposition of sentence, irrespective of a subsequent order  
21 under the provisions of Section 1203.4, 1203.4a, or 1203.41 of the Penal Code.

18 (2) Done any act involving dishonesty, fraud, or deceit with the intent to  
19 substantially benefit himself or herself or another, or substantially injure another.

20 (3) (A) Done any act that if done by a licentiate of the business or profession in  
21 question, would be grounds for suspension or revocation of license.

22 (B) The board may deny a license pursuant to this subdivision only if the  
23 crime or act is substantially related to the qualifications, functions, or duties of the  
24 business or profession for which application is made.

23 (b) Notwithstanding any other provision of this code, a person shall not be  
24 denied a license solely on the basis that he or she has been convicted of a felony if  
25 he or she has obtained a certificate of rehabilitation under Chapter 3.5 (commencing  
26 with Section 4852.01) of Title 6 of Part 3 of the Penal Code or that he or she has  
27 been convicted of a misdemeanor if he or she has met all applicable requirements of  
28 the criteria of rehabilitation developed by the board to evaluate the rehabilitation of  
29 a person when considering the denial of a license under subdivision (a) of Section  
30 482.

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1 (c) Notwithstanding any other provisions of this code, a person shall not be  
2 denied a license solely on the basis of a conviction that has been dismissed pursuant  
3 to Section 1203.4, 1203.4a, or 1203.41 of the Penal Code. An applicant who has a  
4 conviction that has been dismissed pursuant to Section 1203.4, 1203.4a, or 1203.41  
5 of the Penal Code shall provide proof of the dismissal.

6 (d) A board may deny a license regulated by this code on the ground that the  
7 applicant knowingly made a false statement of fact that is required to be revealed in  
8 the application for the license.”

9 7. Section 490 provides, in pertinent part, that a board may suspend or revoke a license  
10 on the ground that the licensee has been convicted of a crime substantially related to the  
11 qualifications, functions, or duties of the business or profession for which the license was issued.  
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13 6. Section 4301 of the Code states, in pertinent part:

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

18 . . . .

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

22 . . . .

23 (h) The administering to oneself, of any controlled substance, or the use of any  
24 dangerous drug or of alcoholic beverages to the extent or in a manner as to be  
25 dangerous or injurious to oneself, to a person holding a license under this chapter,  
26 or to any other person or to the public, or to the extent that the use impairs the  
27 ability of the person to conduct with safety to the public the practice authorized  
28 by the license.

(k) The conviction of more than one misdemeanor or any felony involving the  
use, consumption, or self-administration of any dangerous drug or alcoholic  
beverage, or any combination of those substances.

(l) The conviction of a crime substantially related to the qualifications,  
functions, and duties of a licensee under this chapter. The record of conviction of  
a violation of Chapter 13 (commencing with Section 801) of Title 21 of the  
United States Code regulating controlled substances or of a violation of the  
statutes of this state regulating controlled substances or dangerous drugs shall be  
conclusive evidence of unprofessional conduct. In all other cases, the record of  
conviction shall be conclusive evidence only of the fact that the conviction  
occurred. The board may inquire into the circumstances surrounding the  
commission of the crime, in order to fix the degree of discipline or, in the case of  
a conviction not involving controlled substances or dangerous drugs, to determine  
if the conviction is of an offense substantially related to the qualifications,

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

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### 11 REGULATORY PROVISIONS

12 7. California Code of Regulations, title 16, section 1770, states, in pertinent part:  
13 For the purpose of denial, suspension, or revocation of a personal or facility license  
14 pursuant to Division 1.5 (commencing with Section 475) of the Business and  
15 Professions Code, a crime or act shall be considered substantially related to the  
16 qualifications, functions or duties of a licensee or registrant if to a substantial  
17 degree it evidences present or potential unfitness of a licensee or registrant to  
18 perform the functions authorized by his license or registration in a manner  
19 consistent with the public health, safety, or welfare.

### 20 FIRST CAUSE FOR DENIAL OF APPLICATION

#### 21 (Conviction of Substantially Related Crime)

22 8. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
23 that Respondent has been convicted of a crime substantially related to the qualifications,  
24 functions or duties of a pharmacy technician, as follows:

25 a. On or about March 19, 2012, Respondent was convicted of one interlineated  
26 misdemeanor count for violating Vehicle Code section 12500, subdivision (a) [driving without a  
27 license], in the criminal proceeding entitled *The People of the State of California v. Jesus Cruz*  
28 (Super. Ct. L.A. County, 2011, No. 1JB05628). The court placed Respondent on three years  
summary probation and ordered him to pay fines. On or about January 16, 2014, the court  
dismissed the case pursuant to Penal Code section 1203.4.

b. The circumstances surrounding the conviction occurred or about May 21, 2011, when  
a Los Angeles County Sheriff's Department deputy stopped Respondent for a traffic violation.  
Upon contact, the deputy learned that Respondent did not have his driver's license and the license  
was suspended.

1 **SECOND CAUSE FOR DENIAL OF APPLICATION**

2 **(Conviction of Substantially Related Crime)**

3 9. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
4 that Respondent has been convicted of a crime substantially related to the qualifications,  
5 functions or duties of a pharmacy technician, as follows:

6 10. On or about August 5, 2010, Respondent was convicted of one misdemeanor count of  
7 violating Penal Code section 242 and 243, subdivision (a) [battery], in the criminal proceeding  
8 entitled *The People of the State of California v. Adalit Andrade* (Super. Ct. L.A. County, 2010,  
9 No. 0DV00285). The court sentenced Respondent to 5 days in jail, placed him on 36 months  
10 summary probation, ordered him to perform 24 hours of community service, and ordered him to  
11 complete a 26 week parenting skills program. On or about October 16, 2013, the court dismissed  
12 the case pursuant to Penal Code section 1203.4.

13 b. The circumstances surrounding the conviction occurred or about August 3, 2010,  
14 when a Los Angeles County Sheriff's Department deputy responded to a disturbance and battery  
15 report. Respondent and an ex girlfriend got into a verbal argument regarding Respondent's use  
16 and cleanliness of the ex-girlfriend's residence. The argument continued outside of the ex-  
17 girlfriend's residence where Respondent used his hands to push the ex-girlfriend's neck against a  
18 wall. The ex-girlfriend told the deputy that she and Respondent had a dating relationship and she  
19 allowed Respondent to move back into her residence because he was homeless.

20 **THIRD CAUSE FOR DENIAL OF APPLICATION**

21 **(Conviction of Substantially Related Crime)**

22 11. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
23 that Respondent has been convicted of a crime substantially related to the qualifications,  
24 functions or duties of a pharmacy technician, as follows:

25 a. On or about July 24, 2009, Respondent was convicted of one misdemeanor count of  
26 violating Vehicle Code section 14601.5, subdivision (a) [driving with a suspended license], in the  
27 criminal proceeding entitled *The People of the State of California v. Adalit Andrade* (Super. Ct.  
28 L.A. County, 2009, No. 7PK04881). The court sentenced Respondent to 10 days in jail, placed

1 him on three years summary probation, and ordered him to pay fines. On or about December 13,  
2 2013, the court dismissed the case pursuant to Penal Code section 1203.4.

3 b. The circumstances surrounding the conviction occurred on or about June 26, 2007,  
4 when a Claremont Police Department officer heard loud music coming from Respondent's  
5 vehicle and observed he was speeding. The officer followed Respondent and turned on his siren  
6 several times trying to get Respondent's attention to stop but Respondent continued driving.  
7 When Respondent finally stopped and was contacted by the officer, he verbally identified himself  
8 as "Jesus Hermida-Cruz" and admitted that he did not have a driver's license. Fingerprints  
9 revealed Respondent's identity as "Adalit Andrade" and that his driver's license was suspended.

10 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

11 **(Conviction of Substantially Related Crime)**

12 12. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
13 that Respondent has been convicted of a crime substantially related to the qualifications,  
14 functions or duties of a pharmacy technician, as follows:

15 a. On or about August 16, 2005, Respondent was convicted of one misdemeanor count  
16 of violating Vehicle Code section 14601.2, subdivision (a) [driving with a suspended license], in  
17 the criminal proceeding entitled *The People of the State of California v. Jesus Hermida Cruz*  
18 (Super. Ct. L.A. County, 2005, No. 5PM05994). The court sentenced Respondent to 365 days in  
19 jail, and ordered him to pay a fine. On or about April 1, 2015, the court dismissed the case  
20 pursuant to Penal Code section 1203.4.

21 b. The circumstances surrounding the conviction occurred on or about August 12, 2005,  
22 when a Pomona Police Department officer stopped Respondent for a traffic violation. Upon  
23 contact, the officer found out that Respondent did not have any form of identification and was  
24 driving on a suspended license.

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1 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

2 **(Conviction of Substantially Related Crime)**

3 13. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
4 that Respondent has been convicted of a crime substantially related to the qualifications,  
5 functions or duties of a pharmacy technician, as follows:

6 14. On or about February 22, 2005, Respondent was convicted of one misdemeanor count  
7 of violating Penal Code section 242 [battery], and one misdemeanor count of violating Penal  
8 Code section 602, subdivision (k) [trespassing], in the criminal proceeding entitled *The People of*  
9 *the State of California v. Jesus Hermida Cruz* (Super. Ct. L.A. County, 2005, No. 5PM01291).  
10 The court sentenced Respondent to 90 days in jail, and placed him on three year summary  
11 probation. On or about April 1, 2015, the court dismissed the court pursuant to Penal Code  
12 section 1203.4.

13 b. The circumstances surrounding the conviction occurred on or about February 17,  
14 2005, when a Pomona Police Department officer responded to a report of battery at a market.  
15 Respondent was a former employee and was told numerous times not to come on the premise of  
16 the market. An employee told the Respondent to leave; Respondent entered the bathroom and  
17 closed the door behind him. The employee kicked the door open and Respondent armed himself  
18 with a plunger and struck the employee in the face which caused a bloody nose.

19 **SIXTH CAUSE FOR DENIAL OF APPLICATION**

20 **(Conviction of Substantially Related Crime)**

21 15. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
22 that Respondent has been convicted of a crime substantially related to the qualifications,  
23 functions or duties of a pharmacy technician, as follows:

24 a. On or about April 28, 2004, Respondent was convicted of one misdemeanor count of  
25 violating Penal Code section 245, subdivision (a)(1) [assault with a deadly weapon], and one  
26 misdemeanor count of violating Vehicle Code section 14610, subdivision (a)(1) [display  
27 fraudulently altered, or fraudulently obtained driver's license], in the criminal proceeding entitled  
28 *The People of the State of California v. Jesus Hermida Cruz* (Super. Ct. L.A. County, 2004, No.

1 4PM03035). The court sentenced Respondent to 45 days in jail, and placed him on three years  
2 formal probation. On or about April 1, 2015, the court dismissed the case pursuant to Penal Code  
3 section 1203.4.

4 b. The circumstances surrounding the conviction occurred on or about April 9, 2004,  
5 when Pomona Police Department officers were dispatched to a disturbance call. Upon arrival, the  
6 officers observed Respondent hit a male victim with his vehicle. The victim informed the officers  
7 that Respondent intentionally hit him because he ended their romantic relationship. Respondent  
8 informed the officers that the victim used a garden tool to break Respondent's rear windshield.  
9 During booking, the officers found out that the Respondent's driver's license belonged to  
10 someone else. Respondent admitted that his driver's license was suspended and he was using  
11 someone else's driver's license with his picture on the license.

12 **SEVENTH CAUSE FOR DENIAL OF APPLICATION**

13 **(Conviction of Substantially Related Crime)**

14 16. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
15 that Respondent has been convicted of a crime substantially related to the qualifications,  
16 functions or duties of a pharmacy technician, as follows:

17 a. On or about April 2, 2001, Respondent was convicted of one misdemeanor count of  
18 violating Vehicle Code section 23152, subdivision (b) [driving while having BAC of 0.08%, of  
19 weight, or higher], and one misdemeanor of violating Vehicle Code section 14601.1, subdivision  
20 (a) [driving with a suspended license], in the criminal proceeding entitled *The People of the State*  
21 *of California v. Adalit Andrade* (Super. Ct. L.A. County, 2001, No. 1SA00987). The court  
22 sentenced Respondent to 45 days in jail, placed him on three years summary probation and  
23 suspended his driver's license for two years. On or about February 13, 2014, the court dismissed  
24 the case pursuant to Penal Code section 1203.4.

25 b. The circumstances surrounding the conviction occurred on or about March 18, 2001.

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1 **EIGHTH CAUSE FOR DENIAL OF APPLICATION**

2 **(Conviction of Substantially Related Crime)**

3 17. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
4 that Respondent has been convicted of a crime substantially related to the qualifications,  
5 functions or duties of a pharmacy technician, as follows:

6 a. On or about April 25, 2000, Respondent plead guilty and was convicted of one  
7 misdemeanor count of violating Vehicle Code section 23152, subdivision (a) [driving under the  
8 influence of alcohol or drugs], one misdemeanor count of violating Vehicle Code section 31  
9 [false statements or information to a peace or police officer], and one misdemeanor count of  
10 violating Vehicle Code section 14601.5, subdivision (a) [driving with a suspended license], in the  
11 criminal proceeding entitled *The People of the State of California v. Jesus Hermida Cruz* (Super.  
12 Ct. L.A. County, 2000, No. 0PM02894). The court sentenced Respondent to 150 days in county  
13 jail, placed him on three years on summary probation and ordered him to pay fines. On or about  
14 April 1, 2015, the court dismissed the case pursuant to Penal Code section 1203.4.

15 b. The circumstances surrounding the conviction occurred on or about April 24, 2000,  
16 when a Pomona Police Department officer observed Respondent's vehicle swerving. Upon  
17 contact, the officer smelled an odor of alcohol on Respondent's breath. Respondent was asked to  
18 perform field sobriety tests which he failed to satisfactorily perform as explained and  
19 demonstrated. Respondent's blood alcohol content was 0.10%.

20 **NINTH CAUSE FOR DENIAL OF APPLICATION**

21 **(Conviction of Substantially Related Crime)**

22 18. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
23 that Respondent has been convicted of a crime substantially related to the qualifications,  
24 functions or duties of a pharmacy technician, as follows:

25 a. On or about March 20, 2000, Respondent was convicted of one misdemeanor count  
26 of violating Vehicle Code section 23152, subdivision (b) [driving while having a BAC of 0.08%,  
27 of weight, or higher], in the criminal proceeding entitled *The People of the State of California v.*  
28 *Adalit Andrade* (Super. Ct. L.A. County, 2000, No. 0MT02658). The court placed Respondent on

1 36 months summary probation, ordered him to attend a 3-month first-offender alcohol and other  
2 drug education and counseling program, restricted his driving for 90 days, and order him to pay  
3 fines. On or about February 18, 2014, the court dismissed the case pursuant to Penal Code  
4 section 1203.4.

5 b. The circumstances surrounding the conviction occurred on or about February 28,  
6 2000, when a Los Angeles Police Department officer observed Respondent committing multiple  
7 traffic violations. Upon contact, the officer smelled a strong odor of an alcoholic beverage  
8 coming from him and his clothing. Respondent submitted, but failed to satisfactorily complete  
9 field sobriety tests. Respondent's blood alcohol content was 0.18%.

10 **TENTH CAUSE FOR DENIAL OF APPLICATION**

11 **(Conviction of Substantially Related Crime)**

12 19. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
13 that Respondent has been convicted of a crime substantially related to the qualifications,  
14 functions or duties of a pharmacy technician, as follows:

15 a. On or about August 5, 1998, Respondent plead guilty and was convicted of one  
16 misdemeanor count of violating Penal Code section 273.5, subdivision (a) [inflict corporal injury  
17 to spouse or cohabitant], in the criminal proceeding entitled *The People of the State of California*  
18 *v. Adalit Andrade* (Mun. Ct., El Monte Courthouse Judicial Dist., L.A. county, 1998, No.  
19 8FC00433). The court sentenced Respondent to eight days in jail, placed him on three years  
20 summary probation, ordered him to complete 24 hours of community service and 52 sessions of  
21 domestic violence counseling, and ordered him to attend at least 52 alcoholics anonymous  
22 meetings.

23 b. The circumstances surrounding the conviction occurred on or about July 29, 1998.

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1    **ELEVENTH CAUSE FOR DENIAL OF APPLICATION**

2    **(Conviction of Substantially Related Crime)**

3            20. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
4 that Respondent has been convicted of a crime substantially related to the qualifications,  
5 functions or duties of a pharmacy technician, as follows:

6            a.     On or about November 9, 1995, Respondent plead guilty and was convicted of one  
7 misdemeanor count of violating Penal Code section 242 [battery], in the criminal proceeding  
8 entitled *The People of the State of California v. Jesus Adalit Andrade* (Mun. Ct., El Monte  
9 Courthouse Judicial Dist., L.A. county, 1995, No. 95M01113). The court sentenced Respondent  
10 to 60 days in jail, placed him on three years probation. On or about October 16, 2013, the court  
11 dismissed the case pursuant to Penal Code section 1203.4.

12            b.     The circumstances surrounding the conviction occurred or on about February 5, 1995.

13    **TWELFTH CAUSE FOR DENIAL OF APPLICATION**

14    **(Conviction of Substantially Related Crime)**

15            21. Respondent's application is subject to denial under section 480, subdivision (a)(1), in  
16 that Respondent has been convicted of a crime substantially related to the qualifications,  
17 functions or duties of a pharmacy technician, as follows:

18            a.     On or about November 9, 1995, after pleading guilty, Respondent was convicted of  
19 one misdemeanor count of violating Penal Code section 273.5, subdivision (a) [inflict corporal  
20 injury to spouse or cohabitant], in the criminal proceeding entitled *The People of the State of*  
21 *California v. Adalit Andrade* (Mun. Ct., El Monte Courthouse Judicial Dist., L.A. county, 1995,  
22 No. 95M10514). The court sentenced Respondent to 10 days in jail, placed him on three years  
23 summary probation, and ordered him to attend domestic violence counseling and alcoholic  
24 counseling sessions.

25            b.     The circumstances surrounding the conviction occurred or on November 7, 1995.

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**THIRTEENTH CAUSE FOR DENIAL OF APPLICATION**

**(Commission of Acts of Dishonesty, Fraud, or Deceit)**

22. Respondent's application is subject to denial under Code section 480, subdivision (a)(2), in that Respondent committed acts involving dishonesty, fraud, or deceit with the intent to substantially benefit himself or another, or substantially injure another. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 11, subparagraph (b), and 15, subparagraph (b), inclusive, as though set forth fully.

**FOURTEENTH CAUSE FOR DENIAL OF APPLICATION**

**(Acts Warranting Discipline of Licensure)**

23. Respondent's application is subject to denial under section 480, subdivisions (a)(3)A) and (a)(3)(B), in that Respondent committed acts which if done by a registered pharmacy technician would be grounds for suspension or revocation of the license as follows:

a. Respondent was convicted of crimes substantially related to the qualifications, functions, or duties of a pharmacy technician which to a substantial degree evidence his present or potential unfitness to perform the functions authorized by the license in a manner consistent with the public health, safety, or welfare, in violation Code of sections 4031, subdivision (l) and 490, in conjunction with California Code of Regulations, title 16, section 1770. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 8 through 22, and all subparagraphs as though set forth fully.

b. Respondent used alcoholic beverages to an extent or in a manner dangerous or injurious to himself, any person, or the public, in violation of Code section 4301, subdivision (h). Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 16, subparagraph (b), 17, subparagraph (b), 18 subparagraph (b), 19 subparagraph (b), and 21 subparagraph (b), inclusive, as though set forth fully.

c. Respondent sustained more than one conviction involving the consumption of alcoholic beverages, in violation of Code section 4301, subdivision (k). Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 16, 17, and 18, and all subparagraphs inclusive, as though set forth fully.

1 d. Respondent committed acts involving moral turpitude, dishonesty, fraud, deceit or  
2 corruption, in violation of Code section 4301, subdivision (f). Complainant refers to, and by this  
3 reference incorporates, the allegations set forth above in paragraphs 11, subparagraph (b), 15,  
4 subparagraph (b), 19, subparagraph (b), and 21, subparagraph (b), inclusive, as though set forth  
5 fully.

6 **PRAYER**

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

- 9 1. Denying the application of Jesus Hermida Cruz, aka Jesus Crus, aka Jesus Adalit  
10 Andrade aka Adalit Andrade for a Pharmacy Technician Registration; and,  
11 2. Taking such other and further action as deemed necessary and proper.

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

4/15/16

*Virginia Herold*

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

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