

1 BILL LOCKYER, Attorney General
of the State of California
2 RONALD L. DIEDRICH, State Bar No. 95146
Deputy Attorney General
3 California Department of Justice
1300 I Street, Suite 125
4 P.O. Box 944255
Sacramento, CA 94244-2550
5 Telephone: (916) 324-5333
Facsimile: (916) 327-8643
6 E-mail: ron.diedrich@doj.ca.gov

7 Attorneys for Complainant

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

12 In the Matter of the Accusation Against:

13 **KAREN DENISE HALL**
a.k.a. KAREN DENISE BLAKELY
14 a.k.a. KAREN BLAKELY HALL
6409 Lupine Avenue
15 Bakersfield, California 93308

16 Original Pharmacist License No. 45399

17 Respondent.

Case No. 2589

OAH No. N2003040642

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

18
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
20 above-entitled proceedings that the following matters are true:

21 PARTIES

22 1. Patricia F. Harris ("Complainant") is the Executive Officer of the Board of
23 Pharmacy ("Board"). She brought this action solely in her official capacity and is represented in
24 this matter by Bill Lockyer, Attorney General of the State of California, by Ronald L. Diedrich,
25 Deputy Attorney General.

26 2. Karen Denise Hall ("Respondent") is represented in this proceeding by
27 Baker, Manock & Jensen by attorney George L. Strasser, whose address is Fig Garden Financial
28 Center, 5260 North Palm Avenue, Fourth Floor, Fresno, California 93704-2209.

1 California Administrative Procedure Act and other applicable laws.

2 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
3 each and every right set forth above.

4 CULPABILITY

5 8. Respondent admits the truth of each and every charge and allegation in
6 Accusation No. 2589.

7 9. Respondent agrees that the charges and allegations in Accusation No. 2589
8 form a sufficient basis upon which to revoke her pharmacist license.

9 10. Respondent also admits that during or about the period of June 2001 thru
10 August 2001, while employed as a pharmacist at Costco Pharmacy # 142 Merced, she unlawfully
11 diverted, obtained and self-administered controlled substances.

12 11. Respondent also admits that during or about the period of August 2001
13 thru December 2001, while employed as a pharmacist for Longs Drug Stores, she unlawfully
14 diverted, obtained and self-administered controlled substances.

15 12. Respondent agrees that her pharmacist license is subject to discipline and
16 she agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary
17 Order below.

18 CONTINGENCY

19 13. This stipulation shall be subject to approval by the Board of Pharmacy.
20 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
21 Pharmacy may communicate directly with the Board regarding this stipulation and settlement,
22 without notice to or participation by Respondent or her counsel. By signing the stipulation,
23 Respondent understands and agrees that she may not withdraw her agreement or seek to rescind
24 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt
25 this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall
26 be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
27 between the parties, and the Board shall not be disqualified from further action by having
28 considered this matter.

1 time this decision becomes effective unless otherwise specified in this order.

2 2. **Court Ordered Diversion Program.** Respondent shall successfully
3 complete the drug diversion program ordered by the Stanislaus County Superior Court in the case
4 of *People v. Karen Denise Hall* (Super. Ct. Stanislaus County, 2002, No. 1045916). Failure to
5 successfully complete that program shall constitute a violation of probation, and shall result in
6 the automatic lifting of the stay of the revocation imposed in this case. Irrespective of any other
7 provision in this Stipulated Settlement and Disciplinary Order, the revocation of Respondent's
8 license pursuant to this provision shall be non-appealable and shall be instituted without the
9 benefit of a hearing before the Board.

10 3. **Obey All Laws.** Respondent shall obey all state and federal laws and
11 regulations substantially related to or governing the practice of pharmacy.

12 Respondent shall report any of the following occurrences to the Board, in writing,
13 within 72 hours of such occurrence:

- 14 • an arrest or issuance of a criminal complaint for violation of any provision of the
15 Pharmacy Law, state and federal food and drug laws, or state and federal
16 controlled substances laws
- 17 • a plea of guilty or nolo contendere in any state or federal criminal proceeding to
18 any criminal complaint, information or indictment
- 19 • a conviction of any crime
- 20 • discipline, citation, or other administrative action filed by any state and federal
21 agency which involves Respondent's license or which is related to the practice
22 of pharmacy or the manufacturing, obtaining, handling or distribution or billing
23 or charging for any drug, device or controlled substance.

24 4. **Reporting to the Board.** Respondent shall report to the Board
25 quarterly. The report shall be made either in person or in writing, as directed. Respondent
26 shall state under penalty of perjury whether there has been compliance with all the terms and
27 conditions of probation. If the final probation report is **not** made as directed, probation shall
28 be extended automatically until such time as the final report is made and accepted by the

1 Board.

2 5. **Interview with the Board.** Upon receipt of reasonable notice,
3 Respondent shall appear in person for interviews with the Board upon request at various
4 intervals at a location to be determined by the Board. Failure to appear for a scheduled
5 interview without prior notification to Board staff shall be considered a violation of probation.

6 6. **Cooperation with Board Staff.** Respondent shall cooperate with the
7 Board's inspectional program and in the Board's monitoring and investigation of Respondent's
8 compliance with the terms and conditions of her probation. Failure to comply shall be
9 considered a violation of probation.

10 7. **Continuing Education.** Respondent shall provide evidence of efforts
11 to maintain skill and knowledge as a pharmacist as directed by the Board.

12 8. **Notice to Employers.** Respondent shall notify all present and
13 prospective employers of the decision in case number 2589 and the terms, conditions and
14 restrictions imposed on Respondent by the decision. Within 30 days of the effective date of
15 this decision, and within 15 days of Respondent undertaking new employment, Respondent
16 shall cause her direct supervisor, pharmacist-in-charge and/or owner to report to the Board in
17 writing acknowledging the employer has read the decision in case number 2589.

18 If Respondent works for or is employed by or through a pharmacy employment
19 service, Respondent must notify the direct supervisor, pharmacist-in-charge, and/or owner at
20 every pharmacy of the and terms conditions of the decision in case number 2589 in advance of
21 the Respondent commencing work at each pharmacy.

22 "Employment" within the meaning of this provision shall include any full-time,
23 part-time, temporary, relief or pharmacy management service as a pharmacist, whether the
24 Respondent is considered an employee or independent contractor.

25 9. **No Preceptorships, Supervision of Interns, Being Pharmacist-in-**
26 **Charge (PIC), or Serving as a Consultant.** Respondent shall not supervise any intern
27 pharmacist or perform any of the duties of a preceptor, nor shall Respondent be the
28 pharmacist-in-charge of any entity licensed by the Board or serve as a consultant unless

1 otherwise specified in this order.

2 10. **Reimbursement of Board Costs.** Respondent shall pay to the Board
3 its costs of investigation and prosecution in the amount of \$10,000.00. Respondent shall
4 make said payments as follows: Respondent shall pay \$200 per month for the first 50 months
5 of probation. Payments shall be due in the Board's office no later than the tenth calendar day
6 of the month. Late payments may, in the Board's discretion, being considered a violation of
7 probation. The excusing of one or more late payments shall not be considered a justification
8 for any further late payments or a pattern and practice of late payments, which may, in and of
9 themselves, constitute a basis to revoke Respondent's probation.

10 The filing of bankruptcy by Respondent shall not relieve Respondent of her
11 responsibility to reimburse the Board its costs of investigation and prosecution.

12 11. **Probation Monitoring Costs.** Respondent shall pay the costs
13 associated with probation monitoring as determined by the Board each and every year of
14 probation. Such costs shall be payable to the Board at the end of each year of probation.
15 Failure to pay such costs shall be considered a violation of probation.

16 12. **Status of License.** Respondent shall, at all times while on probation,
17 maintain an active current license with the Board, including any period during which
18 suspension or probation is tolled.

19 If Respondent's license expires or is cancelled by operation of law or otherwise,
20 upon renewal or reapplication, Respondent's license shall be subject to all terms and
21 conditions of this probation not previously satisfied.

22 13. **License Surrender while on Probation/Suspension.** Following the
23 effective date of this decision, should Respondent cease practice due to retirement or health, or
24 be otherwise unable to satisfy the terms and conditions of probation, Respondent may tender
25 her license to the Board for surrender. The Board shall have the discretion whether to grant
26 the request for surrender or take any other action it deems appropriate and reasonable. Upon
27 formal acceptance of the surrender of the license, Respondent will no longer be subject to the
28 terms and conditions of probation.

1 Upon acceptance of the surrender, Respondent shall relinquish her pocket
2 license to the Board within 10 days of notification by the Board that the surrender is accepted.
3 Respondent may not reapply for any license from the Board for three years from the effective
4 date of the surrender. Respondent shall meet all requirements applicable to the license sought
5 as of the date the application for that license is submitted to the Board.

6 **14. Notification of Employment/Mailing Address Change.** Respondent
7 shall notify the Board in writing within 10 days of any change of employment. Said
8 notification shall include the reasons for leaving and/or the address of the new employer,
9 supervisor or owner and work schedule if known. Respondent shall notify the Board in
10 writing within 10 days of a change in name, mailing address or phone number.

11 **15. Tolling of Probation.** Should Respondent, regardless of residency, for
12 any reason cease practicing pharmacy for a minimum of 40 hours per calendar month in
13 California, Respondent must notify the Board in writing within 10 days of cessation of the
14 practice of pharmacy or the resumption of the practice of pharmacy. Such periods of time
15 shall not apply to the reduction of the probation period. It is a violation of probation for
16 Respondent's probation to remain tolled pursuant to the provisions of this condition for a
17 period exceeding three years.

18 "Cessation of practice" means any period of time exceeding 30 days in which
19 Respondent is not engaged in the practice of pharmacy as defined in Section 4052 of the
20 Business and Professions Code.

21 **16. Violation of Probation.** If Respondent violates probation in any
22 respect, the Board, after giving Respondent notice and an opportunity to be heard, may revoke
23 probation and carry out the disciplinary order which was stayed. If a petition to revoke
24 probation or an accusation is filed against Respondent during probation, the Board shall have
25 continuing jurisdiction and the period of probation shall be extended, until the petition to
26 revoke probation or accusation is heard and decided.

27 If Respondent has not complied with any term or condition of probation, the
28 Board shall have continuing jurisdiction over Respondent, and probation shall automatically

1 be extended until all terms and conditions have been satisfied or the Board has taken other
2 action as deemed appropriate to treat the failure to comply as a violation of probation, to
3 terminate probation, and to impose the penalty which was stayed.

4 17. **Completion of Probation.** Upon successful completion of probation,
5 Respondent's license will be fully restored.

6 18. **Rehabilitation Program - Pharmacists Recovery Program (PRP).**
7 Within 30 days of the effective date of this decision, Respondent shall contact the Pharmacists
8 Recovery Program for evaluation and shall successfully participate in and complete the
9 treatment contract and any subsequent addendums as recommended and provided by the PRP
10 and as approved by the Board. The costs for PRP participation shall be borne by the
11 Respondent.

12 If Respondent is currently enrolled in the PRP, said participation is now
13 mandatory and is no longer considered a self-referral under Business and Professions Code
14 section 4363, as of the effective date of this decision. Respondent shall successfully
15 participate in and complete her current contract and any subsequent addendums with the PRP.
16 Probation shall be automatically extended until Respondent successfully completes her
17 treatment contract. Any person terminated from the program shall be automatically suspended
18 upon notice by the Board. Respondent may not resume the practice of pharmacy until notified
19 by the Board in writing. The Board shall retain jurisdiction to institute action to terminate
20 probation for any violation of this term.

21 19. **Random Drug Screening.** Respondent, at her own expense, shall
22 participate in random testing, including but not limited to biological fluid testing (urine,
23 blood), breathalyzer, hair follicle testing, or a drug screening program approved by the Board.
24 The length of time shall be for the entire probation period and the frequency of testing will be
25 determined by the Board. At all times Respondent shall fully cooperate with the Board, and
26 shall, when directed, submit to such tests and samples for the detection of alcohol, narcotics,
27 hypnotics, dangerous drugs or other controlled substances. Failure to submit to testing as
28 directed and/or any confirmed positive drug test shall constitute a violation of probation, and

1 shall result in the automatic lifting of the stay of the revocation imposed in this case.

2 Irrespective of any other provision in this Stipulated Settlement and Disciplinary Order, the
3 revocation of Respondent's license pursuant to this provision shall be non-appealable and
4 shall be instituted without the benefit of a hearing before the Board.

5 20. **Abstain from Drugs and Alcohol Use.** Respondent shall completely
6 abstain from the possession or use of alcohol, controlled substances, dangerous drugs and their
7 associated paraphernalia except when the drugs are lawfully prescribed by a licensed
8 practitioner as part of a documented medical treatment. Upon request of the Board,
9 Respondent shall provide documentation from the licensed practitioner that the prescription
10 was legitimately issued and is a necessary part of the treatment of the Respondent.

11 21. **Supervised Practice.** Respondent shall practice only under the
12 supervision of a pharmacist not on probation with the Board. Respondent shall not practice
13 until the supervisor is approved by the Board. The supervision shall be, as required by the
14 Board, either:

15 Continuous - 75% to 100% of a work week

16 Substantial - At least 50% of a work week

17 Partial - At least 25% of a work week

18 Daily Review - Supervisor's review of probationer's daily activities within 24
19 hours

20 Within 30 days of the effective date of this decision, Respondent shall have her supervisor
21 submit notification to the Board in writing stating the supervisor has read the decision in case
22 number 2589 and is familiar with the level of supervision as determined by the Board.

23 If Respondent changes employment, Respondent shall have her new supervisor,
24 within 15 days after employment commences, submit notification to the Board in writing
25 stating the direct supervisor and pharmacist-in-charge have read the decision in case number
26 2589 and is familiar with the level of supervision as determined by the Board.

27 Within 10, days of leaving employment, Respondent shall notify the Board in
28 writing.

1 22. **No Access to Controlled Substances.** Respondent shall not order,
2 possess, dispense or otherwise have access to any controlled substance(s) in Schedule II, III,
3 IV or V (Health and Safety Code sections 11055-11058 inclusive). Respondent shall not
4 order, receive or retain any triplicate prescription forms.

5 23. **Criminal Probation/Parole Reports.** Respondent shall provide a copy
6 of the conditions of any criminal probation/parole to the Board, in writing, within 10 days of
7 the issuance or modification of those conditions. Respondent shall provide the name of her
8 probation/parole officer to the Board, in writing, within 10 days after that officer is designated
9 or a replacement for that officer is designated. Respondent shall provide a copy of all criminal
10 probation/parole reports to the Board within 10 days after Respondent receives a copy of such
11 a report.

12 24. **Tolling of Suspension.** If Respondent leaves California to reside or
13 practice outside this state, for any period exceeding 10 days (including vacation), Respondent
14 must notify the Board in writing of the dates of departure and return. Periods of residency or
15 practice outside the state - or any absence exceeding a period of 10 days shall not apply to the
16 reduction of the suspension period.

17 Respondent shall not practice pharmacy upon returning to this state until
18 notified by the Board that the period of suspension has been completed.

19 ///
20 ///
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

1 ACCEPTANCE

2 I have carefully read the above Stipulated Settlement and Disciplinary Order
3 and have fully discussed it with my attorney, George L. Strasser. I understand the stipulation
4 and the effect it will have on my pharmacist license. I enter into this Stipulated Settlement
5 and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
6 Decision and Order of the Board of Pharmacy.

7
8 DATED: July 22, 2003 . Karen Denise Hall
9 KAREN DENISE HALL
Respondent

10
11 I have read and fully discussed with Respondent Karen Denise Hall the terms
12 and conditions and other matters contained in the above Stipulated Settlement and
13 Disciplinary Order. I approve its form and content.

14
15 DATED: July 22, 2003 . George L. Strasser
16 GEORGE L. STRASSER, ESQ.
Attorney for Respondent

17
18 ENDORSEMENT

19 The foregoing Stipulated Settlement and Disciplinary Order is hereby
20 respectfully submitted for consideration by the Board of Pharmacy of the Department of
21 Consumer Affairs.

22
23 DATED: July 24, 2003 .

24 BILL LOCKYER, Attorney General
of the State of California

25
26 Ronald L. Diedrich
27 RONALD L. DIEDRICH
Deputy Attorney General

28 Attorneys for Complainant

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

In the Matter of the Accusation Against:

KAREN DENISE HALL
a.k.a. KAREN DENISE BLAKELY
a.k.a. KAREN BLAKELY HALL
6409 Lupine Avenue
Bakersfield, California 93308

Original Pharmacist License No. 45399

Respondent.

Case No. 2589

OAH No. N2003040642

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on October 22, 2003.

It is so ORDERED September 22, 2003.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By



JOHN D. JONES
Board President

Exhibit A
Accusation No. 2589

**KAREN HALL, CASE # 2589
STIPULATED SETTLEMENT
AND DISCIPLINARY ORDER**

1 BILL LOCKYER, Attorney General
of the State of California
2 RONALD L. DIEDRICH, State Bar No. 95146
Deputy Attorney General
3 California Department of Justice
1300 I Street, Suite 125
4 P.O. Box 944255
Sacramento, CA 94244-2550
5 Telephone: (916) 324-5333
Facsimile: (916) 327-8643
6 E-mail: ron.diedrich@doj.ca.gov

7 Attorneys for Complainant

8
9

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

10
11

12 In the Matter of the Accusation Against:

Case No. 2589

13 **KAREN DENISE HALL**
a.k.a.: KAREN DENISE BLAKELY
14 and KAREN BLAKELY HALL
6409 Lupine Avenue
15 Bakersfield, California 93308

ACCUSATION

16 Original Pharmacist License No. 45399

17 Respondent.

18
19

Complainant alleges:

20

PARTIES

21 1. Patricia F. Harris ("Complainant") brings this Accusation solely in her
22 official capacity as the Executive Officer of the Board of Pharmacy ("Board"), Department of
23 Consumer Affairs.

24 2. On or about August 10, 1992, the Board issued Original Pharmacist
25 License Number 45399 to Karen Denise Hall, a.k.a.: Karen Denise Blakely and Karen Blakely
26 Hall ("Respondent").

27 a. On or about September 25, 2002, the Stanislaus County Superior Court
28 ordered that Respondent be precluded from the practice of pharmacy during the pendency of the

1 case of *People v. Karen Denise Hall* (Super. Ct. Stanislaus County, 2002, No.1045916). On or
2 about November 22, 2002, Respondent was convicted, upon her plea of guilty, of violating
3 Health and Safety Code sections 11350/11377 (unlawful possession of a controlled substance, to
4 wit: Codeine). The judgment in that case has been deferred pending her completion of the court
5 ordered drug diversion program.

6 b. Respondent's pharmacist license was in full force and effect at all times
7 relevant to the charges brought herein and will expire on March 31, 2004, unless renewed.

8 JURISDICTION

9 3. The Accusation is brought before the Board under the authority of the
10 following Business and Professions Code ("Code") sections:

11 a. Code section 4300, subdivision (a), provides that "[E]very license issued
12 [by the Board] may be suspended or revoked [by the Board]."

13 b. Code section 4301 provides in pertinent part that "[T]he Board shall take
14 action against any holder of a license who is guilty of unprofessional conduct . . ."

15 STATUTORY PROVISIONS

16 (Unprofessional Conduct)

17 4. Code section 4301, provides, in relevant part, that unprofessional conduct shall
18 include, but not be limited to, the following:

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

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

26 (j) The violation of any of the statutes of this state or of the United
States regulating controlled substances and dangerous drugs.

27 ///

28 ///

(Possession of a Controlled Substance)

5. Code section 4060 provides in pertinent part that:

No person shall possess any controlled substance, except that furnished upon the prescription of a physician, dentist, podiatrist, or veterinarian, or furnished pursuant to a drug order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse practitioner pursuant to Section 2836.1, or a physician assistant pursuant to Section 3502.1. . . .

6. Health & Safety Code section 11350, subdivision (a), provides:

(a) Except as otherwise provided in this division, every person who possesses (1) any controlled substance specified in subdivision (b) or (c), or paragraph (1) of subdivision (f) of Section 11054, specified in paragraph (14), (15), or (20) of subdivision (d) of Section 11054, or specified in subdivision (b) or (c) of Section 11055, or specified in subdivision (h) of Section 11056, or (2) any controlled substance classified in Schedule III, IV, or V which is a narcotic drug, unless upon the written prescription of a physician, dentist, podiatrist, or veterinarian licensed to practice in this state, shall be punished by imprisonment in the state prison.

(Self-Administration or Furnishing of a Controlled Substance)

7. Health and Safety Code section 11170 states that "[N]o person shall prescribe, administer, or furnish a controlled substance for himself."

(Controlled Substances & Dangerous Drugs)

8. Codeine is a Schedule II controlled substance, as listed at Health and Safety Code section 11055, subdivision (b)(1)(H), and a dangerous drug, as defined by Code section 4022.

9. "Norco" (hydrocodone/APAP) is a Schedule III controlled substance, narcotic drug, as listed at Health and Safety Code section 11056, subdivision (e)(4), and a dangerous drug, as defined by Code section 4022.

10. "Soma" (carisoprodol) is a dangerous drug, as defined by Code section 4022.

11. "Xenical" (orlistat) is a dangerous drug, as defined by Code section 4022.

///

///

1 (Cost Recovery)

2 12. Code section 125.3 provides, in pertinent part, that the Board may request
3 the administrative law judge to direct a licensee found to have committed a violation or
4 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
5 and enforcement of the case.

6 FIRST CAUSE FOR DISCIPLINE

7 (Corrupt Acts)

8 13. Respondent is subject to disciplinary action under Code section 4301,
9 subdivision (f), in that Respondent committed acts involving moral turpitude, dishonesty, fraud,
10 deceit, or corruption.

11 14. On or before August 8, 2002, the exact dates of which are unknown,
12 Respondent unlawfully, dishonestly and/or fraudulently appropriated Norco from her employer,
13 while employed as a licensed pharmacist for Patterson Drugs in Patterson, California.

14 SECOND CAUSE FOR DISCIPLINE

15 (Self-Administration)

16 15. Respondent is also subject to disciplinary action under Code section 4301,
17 subdivision (h), in that Respondent administered to herself a controlled substance, or used a
18 dangerous drug to the extent or in a manner as to be dangerous or injurious to herself, to a person
19 holding a pharmacist license, or to any other person or to the public, and/or to the extent that the
20 use impaired his ability to safely conduct the practice of pharmacy.

21 16. On or before August 8, 2002, the exact dates of which are unknown,
22 Respondent administered to herself Codeine, Norco, Soma and/or Xenical. Respondent did not
23 have a valid prescription for these drugs, she was not under a physician's care for which the use
24 of these drugs would be medically warranted, and she had a prior history of substance abuse.

25 THIRD CAUSE FOR DISCIPLINE

26 (Violations of the Law Regulating Controlled Substances - Possession)

27 17. Respondent is also subject to disciplinary action under Code section 4301,
28 subdivision (j), in that Respondent violated Code section 4060 and/or Health and Safety Code

1 section 11350, subdivision (a), which are statutes regulating controlled substances.

2 18. On or about August 8, 2002, Respondent was in possession of Codeine
3 and/or Norco, without a valid prescription.

4 FOURTH CAUSE FOR DISCIPLINE

5 (Violations of the Law Regulating Controlled Substances - Self-Administration)

6 19. Respondent is also subject to disciplinary action under Code section 4301,
7 subdivision (j), in that Respondent violated Health and Safety Code section 11170, which is a
8 statute regulating controlled substances.

9 20. On or before August 8, 2002, the exact dates of which are unknown,
10 Respondent administered and/or furnished to herself Codeine and/or Norco.

11 PRAYER

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

14 1. Revoking or suspending Original Pharmacist License Number 45399,
15 issued to Karen Denise Hall, a.k.a.: Karen Denise Blakely;

16 2. Ordering Karen Denise Hall to pay the Board of Pharmacy the reasonable
17 costs of the investigation and enforcement of this case, pursuant to Business and Professions
18 Code section 125.3; and,

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

20
21 DATED: 3/20/03

22 
23 PATRICIA F. HARRIS
24 Executive Officer
25 Board of Pharmacy
26 Department of Consumer Affairs
27 State of California
28 Complainant

C:\DAT\Licensing\Pharmacy Board\Karen Denise Hall\Accusation.wpd