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8 Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

Case No. 2936

12 ANGELA THOMPSON  
26455 Via Conchita  
13 Mission Viejo, CA 92691

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

14 Pharmacy Technician License No. 38526

15 Respondent.

16  
17 In the interest of a prompt and speedy resolution of this matter, consistent with the  
18 public interest and the responsibility of the Board of Pharmacy of the Department of Consumer  
19 Affairs, the parties hereby agree to the following Stipulated Surrender of License and Order  
20 which will be submitted to the Board for approval and adoption as the final disposition of the  
21 Accusation.

22 PARTIES

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

27 2. ANGELA THOMPSON (Respondent) is representing herself in this  
28 proceeding and has chosen not to exercise her right to be represented by counsel.



1 Board to issue an order accepting the surrender of her Pharmacy Technician License without  
2 further process.

3 CONTINGENCY

4 10. This stipulation shall be subject to approval by the Board of Pharmacy.  
5 Respondent understands and agrees that counsel for Complainant and the staff of the Board of  
6 Pharmacy may communicate directly with the Board regarding this stipulation and surrender,  
7 without notice to or participation by Respondent. By signing the stipulation, Respondent  
8 understands and agrees that she may not withdraw her agreement or seek to rescind the  
9 stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this  
10 stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of  
11 no force or effect, except for this paragraph, it shall be inadmissible in any legal action between  
12 the parties, and the Board shall not be disqualified from further action by having considered this  
13 matter.

14 11. The parties understand and agree that facsimile copies of this Stipulated  
15 Surrender of License and Order, including facsimile signatures thereto, shall have the same force  
16 and effect as the originals.

17 12. In consideration of the foregoing admissions and stipulations, the parties  
18 agree that the Board may, without further notice or formal proceeding, issue and enter the  
19 following Order:

20 ORDER

21 IT IS HEREBY ORDERED that Pharmacy Technician License No. 38526, issued  
22 to Respondent ANGELA THOMPSON is surrendered and accepted by the Board of Pharmacy.

23 13. The surrender of Respondent's Pharmacy Technician License and the  
24 acceptance of the surrendered license by the Board shall constitute the imposition of discipline  
25 against Respondent. This stipulation constitutes a record of the discipline and shall become a  
26 part of Respondent's license history with the Board.

27 14. Respondent shall lose all rights and privileges as a Pharmacy Technician  
28 in California as of the effective date of the Board's Decision and Order.



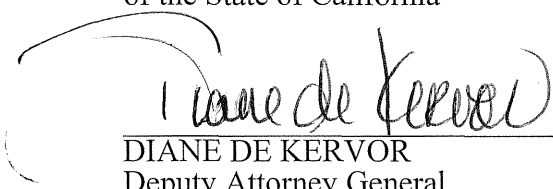
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ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

DATED: April 4, 2024

BILL LOCKYER, Attorney General  
of the State of California

  
\_\_\_\_\_  
DIANE DE KERVOR

Deputy Attorney General

Attorneys for Complainant

DOJ Matter ID: SD2005800171  
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**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

ANGELA THOMPSON  
26455 Via Conchita  
Mission Viejo, CA 92691

Pharmacy Technician License No. 38526

Respondent.

Case No. 2936

**DECISION AND ORDER**

The attached Stipulated Surrender of License and 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 May 31, 2006.

It is so ORDERED May 1, 2006.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

By

  
\_\_\_\_\_  
STANLEY W. GOLDENBERG  
Board President

**Exhibit A**  
**Accusation No. 2936**

1 BILL LOCKYER, Attorney General  
of the State of California  
2 DIANE DE KERVOR, State Bar No. 174721  
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8 Attorneys for Complainant

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

12 In the Matter of the Accusation Against:

13 **ANGELA MARIE THOMPSON**

14 26455 Via Conchita  
Mission Viejo, CA 92691

15 Pharmacy Technician No. TCH 38526

16 Respondent.

Case No. 2936

OAH No.

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

18 Complainant alleges:

19 **PARTIES**

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

23 2. On or about March October 31, 2001, the Board of Pharmacy issued  
24 Original Pharmacy Technician Registration Number TCH 38526 to Angela Marie Thompson  
25 (Respondent). The license was in full force and effect at all times relevant to the charges herein  
26 and will expire on September 30, 2007, unless renewed.

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## JURISDICTION

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

4. Section 118, subdivision (b), of the Code provides that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

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

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

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

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

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

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

6. Section 490 of the Code states:

A board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action which a board is permitted to take following the establishment of a conviction may be taken when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code.

7. Section 493 of the Code states:

Notwithstanding any other provision of law, in a proceeding conducted by a board within the department pursuant to law to deny an application for a license or to suspend or revoke a license or otherwise take disciplinary action against a person

1 who holds a license, upon the ground that the applicant or the licensee has been  
2 convicted of a crime substantially related to the qualifications, functions, and  
3 duties of the licensee in question, the record of conviction of the crime shall be  
4 conclusive evidence of the fact that the conviction occurred, but only of that fact,  
5 and the board may inquire into the circumstances surrounding the commission of  
6 the crime in order to fix the degree of discipline or to determine if the conviction  
7 is substantially related to the qualifications, functions, and duties of the licensee in  
8 question.

9 As used in this section, 'license' includes 'certificate,' 'permit,' 'authority,' and  
10 'registration.'

11 8. Section 4301 of the Code states:

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

16 . . . .

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

20 . . . .

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

23 . . . .

24 (l) The conviction of a crime substantially related to the qualifications, functions,  
25 and duties of a licensee under this chapter. The record of conviction of a violation  
26 of Chapter 13 (commencing with Section 801) of Title 21 of the United States  
27 Code regulating controlled substances or of a violation of the statutes of this state  
28 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, functions, and duties of a  
licensee under this chapter. A plea or verdict of guilty or a conviction following a  
plea of nolo contendere is deemed to be a conviction within the meaning of this  
provision. The board may take action when the time for appeal has elapsed, or the  
judgment of conviction has been affirmed on appeal or when an order granting  
probation is made suspending the imposition of sentence, irrespective of a  
subsequent order under Section 1203.4 of the Penal Code allowing the person to  
withdraw his or her plea of guilty and to enter a plea of not guilty, or setting aside  
the verdict of guilty, or dismissing the accusation, information, or indictment.

29 . . . .

30 (o) Violating or attempting to violate, directly or indirectly, or assisting in or  
31 abetting the violation of or conspiring to violate any provision or term of this  
32 chapter or of the applicable federal and state laws and regulations governing  
33 pharmacy, including regulations established by the board.

34 . . . .



1 17(b) (Receiving Stolen Property); Health and Safety Code section 11375 (b)(2) (Possession of a  
2 Designated Substance - Clonazepam); and Business and Professions Code section 4060  
3 (Possession of a Controlled Substance Without a Prescription- Ambien and Clonazepam.)

4 18. The facts and circumstances surrounding this conviction are as  
5 follows. On or about April 16, 2004, the Tustin Police Department conducted a traffic stop and  
6 arrested Respondent for possession of controlled substances. The officers collected the following  
7 drugs from Respondent's vehicle: 3 bottles of 100 tablets of Ambien 10mg; 1 bottle of 100  
8 tablets of Clonazepam 1 mg; 1 bottle of 100 tablets of Trazodone 100 mg; 1 bottle of 100 tablets  
9 of Zoloft 100 mg; 2 bottles of Augmentin 600 mg powder; and two empty bottles of Viagra 100  
10 mg and 50 mg. Respondent admitted that she stole the substances from her previous employer,  
11 Sav-On Drugs.

12 19. For this conviction, Respondent was sentenced to a term of 3 years  
13 of informal probation and 30 days in Jail.

14 **SECOND CAUSE FOR DISCIPLINE**

15 **(2004 Criminal Conviction - Possession of Methamphetamine For Sale)**

16 20. Respondent is subject to disciplinary action under section 4301,  
17 subdivisions (f), (j), (l) and (o) as well as 480(a), 490, and 493 in that on or about December 29,  
18 2004, Respondent pled guilty to a violation of Health and Safety Code section 11378 (Possession  
19 of Methamphetamine For Sale), a felony.

20 21. The facts and circumstances surrounding this conviction are as  
21 follows: On or about December 19, 2004 the Anaheim Police Department arrested Respondent  
22 for possession of a controlled substance for sale. A quantity of Methamphetamine was found in  
23 Respondent's vehicle.

24 22. Respondent was sentenced to serve 120 days in jail, to pay a fine of  
25 \$200.00, and to 3 years of formal probation.

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1 **PRAYER**


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

4 1. Revoking or suspending Pharmacy Technician Registration  
5 Number TCH 38526, issued to Angela Thompson.

6 2. Ordering Angela Thompson to pay the Board of Pharmacy the  
7 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
8 Professions Code section 125.3;

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

11 DATED: 2/27/06

12  
13   
14 PATRICIA F. HARRIS  
15 Executive Officer  
16 Board of Pharmacy  
17 Department of Consumer Affairs  
18 State of California  
19 Complainant

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