

1 BILL LOCKYER, Attorney General
of the State of California
2 MICHAEL B. FRANKLIN, State Bar No. 136524
Deputy Attorney General
3 California Department of Justice
455 Golden Gate Avenue, Suite 11000
4 San Francisco, CA 94102-7004
Telephone: (415) 703-5622
5 Facsimile: (415) 703-5480

6 Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

12 SARAH SUZANNE LANGLEY
436 Hall Rd.
Silver Lake, WA 98645

13 Pharmacy Technician License No. TCH 49191

14 Respondent.

Case No. 2951

OAH No. N2006020408

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

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

21 PARTIES

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

26 2. Sarah Suzanne Langley (Respondent) is represented in this proceeding by
27 attorney Robert F. Hahn, whose address is Law Offices of Gould & Hahn, 5801 Christie Avenue,
28 Suite 385, Emeryville, California 94608.

ORDER

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2 IT IS HEREBY ORDERED that Pharmacy Technician License No. TCH 49191,
3 issued to Respondent Sarah Suzanne Langley, is surrendered and accepted by the Board of
4 Pharmacy.

5 14. The surrender of Respondent's Pharmacy Technician License and the
6 acceptance of the surrendered license by the Board shall constitute the imposition of discipline
7 against Respondent. This stipulation constitutes a record of the discipline and shall become a
8 part of Respondent's license history with the Board.

9 15. Respondent shall lose all rights and privileges as a Pharmacy Technician
10 in California as of the effective date of the Board's Decision and Order.

11 16. Respondent shall cause to be delivered to the Board both her Pharmacy
12 Technician License wall and pocket license certificate on or before the effective date of the
13 Decision and Order.

14 17. Respondent may not apply or reapply for any licensure or registration of
15 the Board for three (3) years from the effective date of the Decision and Order.

16 18. Respondent understands and agrees that if she ever applies for licensure or
17 petitions for reinstatement in the State of California, the Board shall treat it as a new application
18 for licensure. Respondent must comply with all the laws, regulations and procedures for
19 licensure in effect at the time the application or petition is filed, and all of the charges and
20 allegations contained in Accusation No. 2951 shall be deemed to be true, correct and admitted
21 by Respondent when the Board determines whether to grant or deny the application or petition.

22 19. Respondent shall pay the Board its costs of investigation and enforcement
23 in the amount of \$1,271.00 prior to issuance of a new or reinstated license.

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ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney, Robert F. Hahn. I understand the stipulation and the effect it will have on my Pharmacy Technician License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: _____.

SARAH SUZANNE LANGLEY
Respondent

I have read and fully discussed with Respondent Sarah Suzanne Langley the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: _____.

ROBERT F. HAHN
Attorney for Respondent

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: _____.

BILL LOCKYER, Attorney General
of the State of California

MICHAEL B. FRANKLIN
Deputy Attorney General


Attorneys for Complainant

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ACCEPTANCE

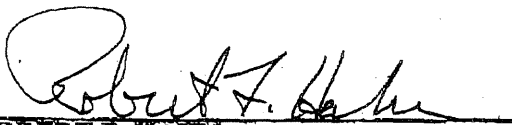
I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney, Robert F. Hahn. I understand the stipulation and the effect it will have on my Pharmacy Technician License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: 07-05-2006


SARAH SUZANNE LANGLEY
Respondent

I have read and fully discussed with Respondent Sarah Suzanne Langley the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: 7-5-06

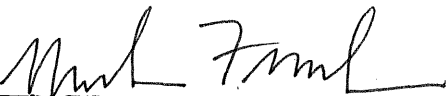

ROBERT F. HAHN
Attorney for Respondent

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: 7/6/06

BILL LOCKYER, Attorney General
of the State of California


MICHAEL B. FRANKLIN
Deputy Attorney General
Attorneys for Complainant

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

In the Matter of the Accusation Against:

SARAH SUZANNE LANGLEY
436 Hall Rd.
Silver Lake, WA 98645

Pharmacy Technician License No. TCH 49191

Respondent.

Case No. 2951

OAH No. N2006020408

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 August 30, 2006.

It is so ORDERED July 31, 2006.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By



WILLIAM POWERS
Board President

Exhibit A
Accusation No. 2951

1 BILL LOCKYER, Attorney General
of the State of California
2 MICHAEL B. FRANKLIN, State Bar No. 136524
Deputy Attorney General
3 California Department of Justice
455 Golden Gate Avenue, Suite 11000
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7 **BEFORE THE**
8 **BOARD OF PHARMACY**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 2951

11 SARAH SUZANNE LANGLEY
12 436 Hall Rd.
13 Silver Lake, WA 98645

OAH No.

A C C U S A T I O N

13 Pharmacy Technician License No. TCH 49191

14 Respondent.

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16 Complainant alleges:

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PARTIES

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

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23 2. On or about August 21, 2003, the Board of Pharmacy issued Pharmacy
24 Technician Number 49191 to Sarah Suzanne Langley (Respondent). The Pharmacy Technician
25 license was in full force and effect at all times relevant to the charges brought herein and will
26 expire on August 31, 2007, unless renewed.

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JURISDICTION

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29 3. This Accusation is brought before the Board of Pharmacy (Board),
Department of Consumer Affairs, under the authority of the following laws. All section

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A. Revoking or suspending Pharmacy Technician Number 49191, issued to Sarah Suzanne Langley Sarah Suzanne Langley.

B. Ordering Sarah Suzanne Langley to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

C. Taking such other and further action as deemed necessary and proper.

DATED: 1/23/06

P. F. Harris
PATRICIA F. HARRIS
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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