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

In the Matter of the Accusation Against: SHEILA JUANITA THORNTON 5032 Morgan Way Antioch, CA 94531 Pharmacy Technician License No. TCH 27034 Respondent.	Case No. 2993 OAH No.

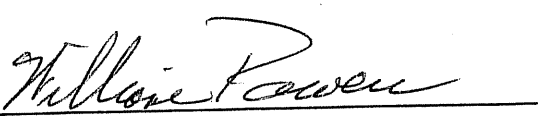
DECISION AND ORDER

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 March 9, 2007.

It is so ORDERED February 7, 2007.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By 
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Attorneys for Complainant

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

In the Matter of the Accusation Against: SHEILA JUANITA THORNTON 5032 Morgan Way Antioch, CA 94531 Pharmacy Technician License No. TCH 27034 Respondent.	Case No. 2993 OAH No. **STIPULATED SURRENDER OF LICENSE AND ORDER**

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

PARTIES

1. Virginia Herold (Complainant) is the Interim Executive Officer of the Board of Pharmacy. She brought this action solely in her official capacity and is represented in this matter by Bill Lockyer, Attorney General of the State of California, by Joshua A. Room, Deputy Attorney General.

2. Sheila Juanita Thornton (Respondent) is representing herself in this proceeding and has chosen not to exercise her right to be represented by counsel.

3. On or about September 4, 1998, the Board of Pharmacy issued Pharmacy Technician License No. TCH 27034 to Sheila Juanita Thornton (Respondent). The License was in full force and effect at all times relevant to the charges brought in Accusation No. 2993 and will expire on September 30, 2008, unless renewed.

JURISDICTION

4. Accusation No. 2993 was filed before the Board of Pharmacy (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on October 30, 2006. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 2993 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read and understands the charges and allegations in Accusation No. 2993. Respondent also has carefully read and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

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

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CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 2993, agrees that cause exists for discipline, and hereby surrenders her Pharmacy Technician License No. TCH 27034 for the Board's formal acceptance.

9. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Pharmacy Technician License without further notice, process, or opportunity to be heard.

RESERVATION

10. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Board or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

CONTINGENCY

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

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

13. In consideration of the foregoing stipulations, the parties agree the Board may, without further notice or formal proceeding, issue the following Order:

ORDER

IT IS HEREBY ORDERED that Pharmacy Technician License No. TCH 27034, issued to Respondent Sheila Juanita Thornton, is surrendered and accepted by the Board.

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

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

16. Respondent shall cause to be delivered to the Board both her wall License and pocket renewal certificate on or before the effective date of this Decision and Order.

17. Respondent may not apply or reapply for, or petition for reinstatement of, any license, permit, or registration from the Board for three (3) years from the effective date of this Decision and Order.

18. Respondent understands and agrees that if she ever applies for licensure or petitions for reinstatement in the State of California, the Board shall treat it as a new application for licensure. Respondent must comply with all the laws, regulations and procedures for licensure in effect at the time the application or petition is filed, and all of the charges and allegations contained in Accusation No. 2993 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the application or petition.

19. Should Respondent ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other heath care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 2993 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

20. Respondent shall pay the Board its costs of investigation and enforcement in the amount of $5,100.00 prior to issuance of a new or reinstated license.

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ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. 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: 12-30-06.

SHEILA JUANITA THORNTON
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: 1/4/07

BILL LOCKYER, Attorney General
of the State of California

FRANK H. PACOE
Supervising Deputy Attorney General

JOSHUA A. ROOM
Deputy Attorney General

Attorneys for Complainant

DOJ Matter ID: SF2006401395
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Exhibit A

Accusation No. 2993

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Attorneys for Complainant

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

In the Matter of the Accusation Against: SHEILA JUANITA THORNTON aka SHEILA JUANITA ROSS aka SHEILA ROSS THORNTON 5032 Morgan Way Antioch, CA 94531 Pharmacy Technician License No. TCH 27034 Respondent.	Case No. 2993 OAH No. **ACCUSATION**

Complainant alleges:

PARTIES

1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity as the Interim Executive Officer, Board of Pharmacy, Department of Consumer Affairs.

2. On or about September 4, 1998, the Board of Pharmacy issued Pharmacy Technician License Number TCH 27034 to Sheila Juanita Thornton aka Sheila Juanita Ross aka Sheila Ross Thornton (Respondent). The License was in full force and effect at all times relevant to the charges brought herein and will expire on September 30, 2006, unless renewed.

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 4011 of the Code provides that the Board shall administer and enforce both the Pharmacy Law [Bus. & Prof. Code, § 4000 et seq.] and the Uniform Controlled Substances Act [Health & Safety Code, § 11000 et seq.].

5. Section 4300(a) of the Code provides that every license issued by the Board may be suspended or revoked.

6. Section 118(b) of the Code provides, in pertinent part, that the suspension, expiration, surrender, or cancellation 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. Section 4402(a) of the Code provides that any license that is not renewed within three years following its expiration may not be renewed, restored, or reinstated and shall be canceled by operation of law at the end of the three-year period.

STATUTORY PROVISIONS

7. Section 4301 of the Code provides, in pertinent part, that the Board shall take action against any holder of a license who is guilty of "unprofessional conduct," defined to include, but not be limited to, any of the following:

. . .

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

. . .

"(h) The administering to oneself, of any controlled substance, or the use of any dangerous drug or of alcoholic beverages to the extent or in a manner as to be dangerous or injurious to oneself, to 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.

. . .

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

. . .

"(l) The conviction of a crime substantially related to the qualifications, functions, and duties of a licensee under this chapter. . . .

. . .

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

. . .

8. California Code of Regulations, title 16, section 1770, states:

"For the purpose of denial, suspension, or revocation of a personal or facility license pursuant to Division 1.5 (commencing with Section 475) of the Business and Professions Code, a crime or act shall be considered substantially related to the qualifications, functions or duties of a licensee or registrant if to a substantial degree it evidences present or potential unfitness of a licensee or registrant to perform the functions authorized by his license or registration in a manner consistent with the public health, safety, or welfare."

9. Section 4060 of the Code provides, in pertinent part, that no person shall possess any controlled substance, except that furnished to a person upon the prescription of a physician, dentist, podiatrist, or veterinarian, or furnished pursuant to a drug order issued by a certified nurse-midwife, a nurse practitioner, or a physician assistant.

10. Section 4327 of the Code, in pertinent part, makes it unlawful, while on duty, to sell, dispense or compound any drug while under the influence of any dangerous drug.

11. Health and Safety Code section 11170 provides that no person shall prescribe, administer, or furnish a controlled substance for himself or herself.

12. Health and Safety Code section 11173, subdivision (a), provides that no person shall obtain or attempt to obtain controlled substances, or procure or attempt to procure the administration of or prescription for controlled substances, (1) by fraud, deceit, misrepresentation, or subterfuge; or (2) by the concealment of a material fact.

13. Health and Safety Code section 11350, in pertinent part, makes it unlawful to possess certain Schedule I-III controlled substances, or any controlled substance in Schedules III-V which is a narcotic drug, unless upon written prescription of an authorized prescriber.

14. Health and Safety Code section 11375, in pertinent part, makes it unlawful for any person to possess any form of **diazepam**, **lorazepam**, **temazepam**, or **phentermine**.

15. Health and Safety Code section 11377, in pertinent part, makes it unlawful to possess certain Schedule I-III controlled substances, or any controlled substance in Schedules III-V which is not a narcotic drug, unless upon written prescription of an authorized prescriber.

16. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation of the licensing act to pay a sum not to exceed its reasonable costs of investigation and enforcement.

CONTROLLED SUBSTANCES / DANGEROUS DRUGS

17. Section 4021 of the Code states:

"'Controlled substance' means any substance listed in Chapter 2 (commencing with Section 11053) of Division 10 of the Health and Safety Code."

18. Section 4022 of the Code states, in pertinent part:

"'Dangerous drug' or 'dangerous device' means any drug or device unsafe for self-use, except veterinary drugs that are labeled as such, and includes the following:

"(a) Any drug that bears the legend: 'Caution: federal law prohibits dispensing without prescription,' 'Rx only,' or words of similar import.

. . .

"(c) Any other drug or device that by federal or state law can be lawfully dispensed only on prescription or furnished pursuant to Section 4006."

19. **Norco**, **Lortab**, **Vicodin**, and **Lorcet** are brand names for compounds of varying dosages of acetaminophen (aka APAP) and **hydrocodone**, a Schedule III controlled substance as designated by Health and Safety Code section 11056(e)(4) and a dangerous drug as designated by Business and Professions Code section 4022. These varying compounds are also known as **Hydrocodone with APAP**. These are narcotic drugs intended for pain relief.

20. **Vicoprofen** is a brand name for a compound containing ibuprofen and **hydrocodone**, a Schedule III controlled substance as designated by Health and Safety Code section 11056(e)(4) and a dangerous drug as designated by Business and Professions Code section 4022. It is a narcotic drug intended for pain relief.

21. **Fiorinal** and **Fioricet** are among the brand names for drug compounds containing either aspirin or acetaminophen (APAP), caffeine, and **butalbital**, a Schedule III controlled substance as designated by Health and Safety Code section 11056(e)(3) and a dangerous drug as designated by Business and Professions Code section 4022. It is a non-narcotic analgesic drug often prescribed as a treatment for migraines or tension headaches.

22. **Fiorinal with Codeine** is a brand name for a compound of aspirin, caffeine, **butalbital**, a Schedule III controlled substance as designated by Health and Safety Code section 11056(e)(3) and a dangerous drug as designated by Business and Professions Code section 4022, and **codeine**, a Schedule III controlled substance as designated by Health and Safety Code section 11056(e)(2) and a dangerous drug as designated by Business and Professions Code section 4022. **Butalbital** is a non-narcotic analgesic drug often prescribed as a treatment for migraines or tension headaches. **Codeine** is a narcotic pain reliever and muscle relaxant.

23. **Lunesta** is a brand name for **eszopiclone**, or **(S)-zopiclone**, a Schedule IV controlled substance as designated by federal law, 21 C.F.R. § 1308.14(c), and a dangerous drug as designated by Business and Professions Code section 4022. It is a depressant drug.

24. **Valium** is a brand name for **diazepam**, a Schedule IV controlled substance as designated by Health and Safety Code section 11057(d)(9) and a dangerous drug as designated by Business and Professions Code section 4022. It is a depressant drug.

25. **Ativan** is a brand name for **lorazepam**, a Schedule IV controlled substance as designated by Health and Safety Code section 11057(d)(16) and a dangerous drug as designated by Business and Professions Code section 4022. It is a depressant drug.

26. **Restoril** is a brand name for **temazepam**, a Schedule IV controlled substance as designated by Health and Safety Code section 11057(d)(29) and a dangerous drug as designated by Business and Professions Code section 4022. It is a depressant drug.

27. **Adipex** and **Fastin** are brand names for **phentermine**, a Schedule IV controlled substance as designated by Health and Safety Code section 11057(f)(4) and dangerous drug as designated by Business and Professions Code section 4022. It is a stimulant drug.

28. **Flexeril** is a brand name for **cyclobenzaprine**, a dangerous drug as designated by Business and Professions Code section 4022. It is a muscle relaxant drug.

29. **Prozac** is a brand name for **fluoxetine hydrochloride**, a dangerous drug as designated by Business and Professions Code section 4022. It is an anti-depressant drug.

30. **Celebrex** is a brand name for **celecoxib**, a dangerous drug as designated by Business and Professions Code section 4022. It is intended for pain relief.

31. **Naprosyn** is a brand name for **naproxen**, a dangerous drug as designated by Business and Professions Code section 4022. It is intended for pain relief.

32. **Atarax** and **Vistaril** are brand names for **hydroxyzine**, a dangerous drug as designated by Business and Professions Code section 4022. It is an antihistamine drug.

33. **Midrin** is a brand name for a compound of acetaminophen (APAP), **isometheptene mucate**, and **dichloralphenazone**, dangerous drugs as designated by Business and Professions Code section 4022. It is intended for relief of tension or migraine headaches.

FACTUAL BACKGROUND

34. On or about September 29, 2005, while Respondent was employed as a pharmacy technician at a Raley's Drug Center (PHY 20489) in Pittsburg, California, ten tablets of generic **Norco** were discovered loose on a chair used by Respondent.

35. On and between September 29, 2005 and October 12, 2005, Respondent's superior(s) at Raley's conducted daily counts of generic **Norco**, and discovered that on six of the nine days worked by Respondent, there were **Norco** shortages: 49 tablets on 9/29; 42 tablets on 10/4, 56 tablets on 10/7, 22 tablets on 10/8; 22 tablets on 10/11, and 52 tablets on 10/12. There were no shortages on the three days during that span that Respondent did not work.

36. On or about October 12, 2005, Respondent was observed by videocamera surveillance taking unknown/unspecified drugs from the Raley's stock and placing them in her pocket and/or purse. At the end of that day's shift, Respondent was detained by Raley's security.

37. On or about October 12, 2005, Respondent admitted to Raley's security to stealing controlled substances and/or dangerous drugs from Raley's, beginning with her thefts of **Vicodin** from in or about February 2005 forward. Respondent said she was taking several drugs, by the handful, on numerous occasions over time, but could not specify an exact amount of theft.

38. On or about October 12, 2005, Raley's security recovered numerous loose tablets from Respondent's purse or person, including: 51 generic **Norco**, 1 **Lunesta**, 5 **Flexeril**, 5 **hydroxyzine** (generic **Atarax** or **Vistaril**), 1 **lorazepam** (generic **Ativan**), 9 generic **Fiorinal**, 2 **Prozac**, 1 generic **Midrin**, 4 **diazepam** (generic **Valium**), 7 **temazepam** (generic **Restoril**), 2 **Vicoprofen**, 10 generic **Lortab**, and 24 **phentermine** (generic **Adipex** or **Fastin**). Respondent admitted that these drugs had also been stolen from Raley's stock.

39. Respondent was immediately suspended from Raley's and subsequently turned over to Pittsburg Police. A search of her person conducted by Pittsburg Police discovered a further 37 tablets in her boots, including 8 **Valium**, 10 **Vicodin**, 4 ibuprofen, 5 **Celebrex**, 3 **naproxen** (generic **Naprosyn**), 4 **phentermine** (generic **Adipex** or **Fastin**), and 3 **Ativan**.

40. During the course of the Board investigation, Respondent admitted to her theft between May and October 2005 of large quantities of several controlled substances and/or dangerous drugs, including but not necessarily limited to **Norco**, **Lunesta**, **temazepam** (generic **Restoril**), **Vicoprofen**, **Lortab**, **phentermine** (generic **Adipex** or **Fastin**), **Fastin**, and **Adipex**. Respondent admitted to stealing between 20 to 40 tablets just of **Norco** per week, along with an unknown/unspecified number of tablets/dosages of the other drugs stolen. Respondent admitted that the drugs had been stolen for her own use, and that she often took the drugs while at work. Respondent admitted to often being under the influence of controlled substances at work.

41. The total number of thefts by Respondent from Raley's is unknown, but is believed to be at least 2,340 tablets of various drugs and dosages.

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FIRST CAUSE FOR DISCIPLINE

(Conviction of Substantially Related Crime)

42. Respondent is subject to discipline under Code section 4301(l) of the Code as further specified by California Code of Regulations, title 16, section 1770, in that, on or about July 25, 2006, in a criminal case titled *People v. Sheila Ross Thornton*, Case No. 5060508-9 in Contra Costa County Superior Court, Respondent was convicted by no contest plea of: violating Health and Safety Code section 11350, subdivision (a) [Possession of controlled substance], a felony, for illegal possession of **hydrocodone**, **diazepam**, and **phentermine**; and violating Penal Code section 503 [Embezzlement], a misdemeanor, for thefts from Raley's committed between February 1, 2005 and October 12, 2005. The conviction was entered as follows:

a. On or about October 12, 2005, based on the facts described in Paragraphs 34-38, above, Respondent was arrested by Pittsburg Police.

b. On or about April 20, 2006, in a criminal case titled *People v. Sheila Ross Thornton*, Case No. 5060508-9 in Contra Costa County Superior Court, Respondent was charged by criminal Information with two counts, one felony and one misdemeanor: (1) a violation of Health and Safety Code section 11350, subdivision (a) [Possession of controlled substance], a felony, for illegal possession of **hydrocodone**, **diazepam**, and **phentermine**; and (2) a violation of Penal Code section 503 [Embezzlement], a misdemeanor, for thefts from Raley's committed between February 1, 2005 and October 12, 2005.

c. On or about July 25, 2006, Respondent pleaded no contest to both counts. Imposition of sentence was suspended in favor of an order of court probation for two (2) years on terms and conditions including jail time of 30 days, with credit for 30 days already served, fines and fees, search conditions, and a prohibition on use/possession of drugs without prescription.

SECOND CAUSE FOR DISCIPLINE

(Acts Involving Moral Turpitude, Dishonesty, Fraud, Deceit or Corruption)

43. Respondent is subject to discipline under section 4301(f) of the Code in that Respondent, as described in paragraphs 34-41 above, committed acts involving moral turpitude, dishonesty, fraud, deceit, or corruption.

THIRD CAUSE FOR DISCIPLINE

(Unlawful Self-Administration of Controlled Substances)

44. Respondent is subject to discipline under section 4301(h), (j), and/or (o) of the Code, by reference to or inclusive of Health and Safety Code section 11170, in that, as described in Paragraphs 34-41 above, in and between February and October 2005, Respondent took for her own use and self-administered controlled substances, including but not limited to **Norco**, **Lortab**, and other **hydrocodone**-containing drugs, **phentermine**, and **temazepam**.

FOURTH CAUSE FOR DISCIPLINE

(Unlawful Possession of Controlled Substances)

45. Respondent is subject to discipline under section 4301 (j), (o) and/or 4060 of the Code, by reference to or inclusive of Health and Safety Code sections 11350, 11375 and/or 11377, in that, as described in Paragraphs 34-41 above, in and between February and October 2005, Respondent possessed without valid prescriptions controlled substances, including but not limited to **Norco** and other **hydrocodone**-containing narcotic drugs, **diazepam**, **lorazepam**, **temazepam**, and **phentermine**, and various non-narcotic controlled substances, including but not limited to **Fiorinal** (**butalbital**) and **Lunesta** (**eszopiclone**).

FIFTH CAUSE FOR DISCIPLINE

(Obtaining Controlled Substances by Fraud, Deceit, or Subterfuge)

46. Respondent is subject to discipline under section 4301 (j) and/or (o) of the Code, by reference to or inclusive of Health and Safety Code section 11173(a), in that, as described in Paragraphs 34-41 above, in and between February and October 2005, Respondent obtained numerous controlled substances by fraud, deceit, or subterfuge.

SIXTH CAUSE FOR DISCIPLINE

(Selling or Dispensing While Under the Influence of Dangerous Drug)

47. Respondent is subject to discipline under section 4301 (j), (o) and/or 4327 of the Code, in that, as described in Paragraphs 34-41 above, in and between February and October 2005, Respondent, while on duty, on numerous occasions sold or dispensed dangerous drugs while she was herself under the influence of one or more dangerous drugs.

SEVENTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

48. Respondent is subject to disciplinary action under section 4301 of the Code in that Respondent, by way of the conduct described in paragraphs 34-47 above, engaged in "unprofessional conduct" not becoming the profession of pharmacy.

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:

A. Revoking or suspending Pharmacy Technician License No. TCH 27034, issued to Respondent Sheila Juanita Thornton aka Sheila Juanita Ross aka Sheila Ross Thornton;

B. Ordering Respondent to pay the Board its reasonable costs of investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

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

DATED: 10/27/06

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

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