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

In the Matter of the Accusation Against:

Case No. 3332

**ELISAJOY ESPIRITU RAMOS** 

12329 Spyglass Terrace Poway, CA 92064

Pharmacy Technician License No. TCH 83365

Respondent.

# **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 25, 2010.

It is so ORDERED on July 26, 2010.

BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

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By

STANLEY C. WEISSER Board President

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1	EDMUND G. BROWN JR.			
2	Attorney General of California JAMES M. LEDAKIS			
3	Supervising Deputy Attorney General CARL W. SONNE			
4	Deputy Attorney General State Bar No. 116253			
5	110 West "A" Street, Suite 1100 San Diego, CA 92101			
6	P.O. Box 85266			
7	San Diego, CA 92186-5266 Telephone: (619) 645-3164			
	Facsimile: (619) 645-2061 Attorneys for Complainant			
8	BEFORE THE			
9	BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS			
10	STATE OF C	CALIFORNIA		
11	In the Matter of the Accusation Against:	Case No. 3332		
12				
13	ELISAJOY ESPIRITU RAMOS 12329 Spyglass Terrace	STIPULATED SURRENDER OF		
14	Poway, CA 92064	LICENSE AND ORDER		
15	Pharmacy Technician Registration No. TCH 83365			
16	Respondent.	. '		
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19	IT IS HEREBY STIPULATED AND AGI	REED by and between the parties in this		
20	proceeding that the following matters are true:			
21	PAR	TIES		
22	1. Virginia Herold (Complainant) is the	Executive Officer of the Board of Pharmacy.		
23	She brought this action solely in her official capacity and is represented in this matter by Edmund			
24	G. Brown Jr., Attorney General of the State of California, by Carl W. Sonne, Deputy Attorney			
25	General.			
26	2. Elisajoy Espiritu Ramos (Responden	t) is represented in this proceeding by attorney		
27	David Wight, whose address is 8880 Rio San Diego Dr., Suite 800, San Diego, CA 92108.			
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3. On or about June 2, 2008, the Board of Pharmacy issued Pharmacy Technician Registration No. TCH 83365 to Elisajoy Espiritu Ramos (Respondent). The subject license was in full force and effect at all times relevant to the charges brought in Accusation No. 3332 and will expire on October 31, 2011, unless renewed.

#### JURISDICTION

4. Accusation No. 3332 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 20, 2009. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 3332 is attached as Exhibit A and incorporated herein by reference.

#### ADVISEMENT AND WAIVERS

- 5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 3332. Respondent also has carefully read, fully discussed with counsel, 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 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.

#### **CULPABILITY**

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 3332, agrees that cause exists for discipline and hereby surrenders her Pharmacy Technician Registration No. TCH 83365 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 Registration without further process.

## CONTINGENCY

- 10. 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 of Pharmacy may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent or her counsel. 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.
- 11. 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.
- 12. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.
- 13. In consideration of the foregoing admissions and stipulations, the parties agree that the (Board) may, without further notice or formal proceeding, issue and enter the following Order:

### ORDER

IT IS HEREBY ORDERED that Pharmacy Technician Registration No. TCH 83365, issued to Respondent Elisajoy Espiritu Ramos is surrendered and accepted by the Board of Pharmacy.

- 14. The surrender of Respondent's Pharmacy Technician Registration 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 certificate and, if one was issued, pocket license on or before the effective date of the Decision and Order.
- 17. 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 may not reapply or petition the board for reinstatement of her revoked license for three years from the effective date of this Decision and Order. 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. 3332 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the application or petition.
- 18. Should Respondent ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation, No. 3332 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.
- 19. Respondent shall pay the Board its costs of investigation and enforcement in the amount of \$4,717.00 prior to issuance of a new or reinstated license.

#### **ACCEPTANCE**

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney, David Wight. I understand the stipulation and the effect it will have on my Pharmacy Technician Registration. I enter into this Stipulated Surrender of License

1	and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decisi	ion and	
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3	3		
4	4 DATED: 4 30 10 WWW.		
5	5 ELISAJOY ESPIRITU RAMIOS Respondent		
6	I have read and fully discussed with Elisajoy Espiritu Ramos the terms and conditions and		
7	other matters contained in this Stipulated Surrender of License and Order. I approve its	form and	
8	8 content.		
9			
10	DAVID WIGHT Attorney for Respondent		
11	<b>1</b>		
12	2 <u>ENDORSEMENT</u>		
13	The foregoing Stipulated Surrender of License and Order is hereby respectfully su	bmitted	
14	for consideration by the Board of Pharmacy of the Department of Consumer Affairs.		
15	5 Dated: April 30, 2010 Respectfully submitted,	~	
16	EDMUND G. BROWN JR. Attorney General of California		
17	JAMES M. LEDAKIS Supervising Deputy Attorney Gener	.a1	
18	8 Supervising Deputy Attorney Coner		
19	1		
20	Deputy Attorney General		
21	1 Attorneys for Complainant		
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1	and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and	
2	Order of the Board of Pharmacy.	
3		
4	DATED:	
5	ELISAJOY ESPIRITU RAMOS Respondent	
6	I have read and fully discussed with Elisajoy Espiritu Ramos the terms and conditions and	
7	other matters contained in this Stipulated Surrender of License and Order. I approve its form and	
8	content.	
9	DATED: 5/5/16	
10	DAVID WIGHT Attorney for Respondent	
11		
12	ENDORSEMENT	
13	The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted	
14	for consideration by the Board of Pharmacy of the Department of Consumer Affairs.	
15	Dated: April 30, 2010 Respectfully submitted,	
16	EDMUND G. BROWN JR. Attorney General of California	
17	JAMES M. LEDAKIS Supervising Deputy Attorney General	
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19	Carry IV. Course	
20	CARL W. SONNE Deputy Attorney General	
21	Attorneys for Complainant	
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1	and Order voluntarily, knowingly, and intell	ligently, and agree to be bound by the Decision and
2	Order of the Board of Pharmacy.	,
3		
4	DATED:	
5		ELISAJOY ESPIRITU RAMOS Respondent
6	I have read and fully discussed with Elisajoy Espiritu Ramos the terms and conditions and	
7	other matters contained in this Stipulated Surrender of License and Order. I approve its form and	
8	content.	
9	DATED:	
10		DAVID WIGHT Attorney for Respondent
11		
12	<u>ENI</u>	DORSEMENT
13	The foregoing Stipulated Surrender of	f License and Order is hereby respectfully submitted
14	for consideration by the Board of Pharmacy of the Department of Consumer Affairs.	
15	Dated: April 30, 2010	Respectfully submitted,
16		EDMUND G. BROWN JR. Attorney General of California
17		JAMES M. LEDAKIS Supervising Deputy Attorney General
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19		CARL W. SONNE
20		Deputy Attorney General Attorneys for Complainant
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Exhibit A

Accusation No. 3332

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1 2 3 4 5 6 7 8	EDMUND G. BROWN JR. Attorney General of California JAMES M. LEDAKIS Supervising Deputy Attorney General CARL W. SONNE Deputy Attorney General State Bar No. 116253 110 West "A" Street, Suite 1100 San Diego, CA 92101 P.O. Box 85266 San Diego, CA 92186-5266 Telephone: (619) 645-3164 Facsimile: (619) 645-2061 Attorneys for Complainant	
	BEFOI	RE THE
10	BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA	
.,		
11	In the Matter of the Accusation Against:	Case No. 3332
12	ELISAJOY ESPIRITU RAMOS	ACCUSATION
13	12329 Spyglass Terrace	
14	Poway, CA 92064	
15	Pharmacy Technician Reg. No. TCH 83365	
16	Respondent.	
17		•
18	Complainant alleges:	
19	PAR	TIES
20	1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity	
21	as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.	
22	2. On or about June 2, 2008, the Board of Pharmacy issued Pharmacy Technician	
23	Registration Number TCH 83365 to Elisajoy Espiritu Ramos (Respondent). The Pharmacy	
24	Technician Registration was in full force and effect at all times relevant to the charges brought	
25	herein and will expire on October 31, 2009, unle	ss 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 (Code) unless otherwise indicated.
- 4. Section 118, subdivision (b), of the Code provides 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.
- 5. Section 4300, subdivision (a) states "Every license issued may be suspended or revoked."

#### STATUTORY PROVISIONS

- 6. Section 490 of the Code provides, in pertinent part, that a board may suspend or revoke a license on the ground that the licensee has been convicted of a crime substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued.
  - 7. Section 4022 of the Code states
    - "Dangerous drug" or "dangerous device" means any drug or device unsafe for self-use in humans or animals, 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.
    - (b) Any device that bears the statement: "Caution: federal law restricts this device to sale by or on the order of a \_\_\_\_\_\_," "Rx only," or words of similar import, the blank to be filled in with the designation of the practitioner licensed to use or order use of the device.
    - (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.
  - 8. Section 4301 of the Code states:

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

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(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.

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

(1) 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, 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.

- (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 or by any other state or federal regulatory agency.
- 9. Section 4059 of the Code states, in pertinent part, that a person may not furnish any dangerous drug except upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7. A person may not furnish any dangerous device, except upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7.
  - 10. Section 4060 of the Code states:

No person shall possess any controlled substance, except that furnished to a

person upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7, 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, or naturopathic doctor pursuant to Section 3640.5, or a pharmacist pursuant to either subparagraph (D) of paragraph (4) of, or clause (iv) of subparagraph (A) of paragraph (5) of, subdivision (a) of Section 4052. This section shall not apply to the possession of any controlled substance by a manufacturer, wholesaler, pharmacy, pharmacist, physician, podiatrist, dentist, optometrist, veterinarian, naturopathic doctor, certified nurse-midwife, nurse practitioner, or physician assistant, when in stock in containers correctly labeled with the name and address of the supplier or producer.

Nothing in this section authorizes a certified nurse-midwife, a nurse practitioner, a physician assistant, or a naturopathic doctor, to order his or her own stock of dangerous drugs and devices.

### 11. Section 11158(a) of the Health and Safety Code states:

Except as provided in Section 11159 or in subdivision (b) of this section, no controlled substance classified in Schedule II shall be dispensed without a prescription meeting the requirements of this chapter. Except as provided in Section 11159 or when dispensed directly to an ultimate user by a practitioner, other than a pharmacist or pharmacy, no controlled substance classified in Schedule III, IV, or V may be dispensed without a prescription meeting the requirements of this chapter.

#### 12. Section 11173(a) of the Health and Safety Code states:

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. Section 11351 of the Health and Safety Code states:

Except as otherwise provided in this division, every person who possesses for sale or purchases for purposes of sale (1) any controlled substance specified in subdivision (b), (c), or (e) 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, shall be punished by imprisonment in the state prison for two, three, or four years.

- 14. United States Code, title 21, section 843 states, in pertinent part:
  - (a) It shall be unlawful for any person knowingly or intentionally --

(3) to acquire or obtain possession of a controlled substance by misrepresentation, fraud, forgery, deception, or subterfuge;

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- (b) When considering the suspension or revocation of a facility or a personal license on the ground that the licensee or the registrant has been convicted of a crime, the board, in evaluating the rehabilitation of such person and his present
  - (3) The time that has elapsed since commission of the act(s) or offense(s).
  - (4) Whether the licensee has complied with all terms of parole, probation, restitution or any other sanctions lawfully imposed against the licensee.
    - (5) Evidence, if any, of rehabilitation submitted by the licensee.

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

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

18. Alprazolam, the generic name for Xanax, is a Schedule IV controlled substance as designated by California Health and Safety Code section 11057, subdivision (d)(1), and is classified as a dangerous drug pursuant to Business and Professions Code section 4022.

- 19. Norco, a brand name for hydrocodone with acetaminophen (APAP), is a Schedule III controlled substance as designated by Health and Safety Code section 11056, subdivision (e)(4), and is classified as a dangerous drug pursuant to section 4022.
- 20. Oxycodone, also sold under the brand name OxyContin, is a Schedule II controlled substance as designated by Health and Safety Code section 11055, subdivision (b)(1)(N), and is classified as a dangerous drug pursuant to Business and Professions Code section 4022.
- 21. <u>Suboxone</u>, the brand name for buprenorphine and naloxone, is a Schedule V controlled substance pursuant to Health and Safety Code section 11058, subdivision (d), and is classified as a dangerous drug pursuant to Business and Professions Code section 4022.

#### FACTS

- 22. On or about June 4, 2008, following an audit of controlled substances, Sav-On Pharmacy (located inside a San Diego Albertson's grocery store), reported to the Drug Enforcement Administration that approximately 800 tablets of oxycodone in various strengths were missing from inventory. The information was reported to the Board on June 5, 2008.
- 23. As a result of the missing controlled substances, an Albertson's loss prevention officer performed additional audits of missing inventory, conducted electronic surveillance of the pharmacy, and interviewed employees. Respondent, who was employed as a Pharmacy Clerk, admitted to the loss prevention officer that since April 2008, she had removed bottles of drugs from the pharmacy's shelves and took them into the bathroom where she would conceal the drugs in her lunch bag. Respondent admitted that she had taken at least 22 bottles containing various quantities and strengths of alprazolam (Xanax), Suboxone, Norco, and Oxycontin. Respondent stated that her female cousin, an associate of the Asian Crips gang, produced a gun and threatened the life of her and her family if she did not steal the drugs. Respondent stated she would receive text messages from her cousin directing her to steal drugs. Respondent would drop them off at her cousin's house; her cousin would then sell the drugs on the street and share some of the profits with Respondent.
- 24. On or about July 11, 2008, the San Diego Police Department conducted a "sting" in order to obtain evidence to corroborate Respondent's claim that she stole the controlled

substances against her will. Under police surveillance, Respondent drove to her cousin's house to drop off two bottles of drugs provided by the pharmacy. Respondent's cousin entered the vehicle, which had been wired with a concealed audio device. Respondent told her cousin that she was worried about being caught and no longer wanted to participate in stealing drugs. Respondent's cousin made no effort to dissuade or convince Respondent to continue with their scheme. Both women were arrested and taken into custody. Respondent's cousin allowed police to search her room where the officers found a large quantity of prescription drugs in baggies and bottles.

# FIRST CAUSE FOR DISCIPLINE

(September 18, 2008 Criminal Conviction for Fraudulent Appropriation by an Employee)

- 25. Respondent subjected her license to discipline under sections 490 and 4301, subdivision (I), of the Code in that she was convicted of a crime that is substantially related to the qualifications, duties, and functions of a pharmacy technician. The circumstances are as follows:
- a. On or about September 18, 2008, in a criminal proceeding entitled *People of the State of California v. Elisajoy E. Ramos*, in San Diego County Superior Court, case number CD214750, Respondent was convicted on her plea of guilty for violating Penal Code section 508, fraudulent appropriation by an employee of property in excess of \$400 grand theft, a felony.
- b. As a result of the conviction, on or about October 30, 2008, Respondent was sentenced to one day in jail, with credit for one day, three years formal probation, complete 15 days of public work service, and pay fines, fees, and restitution in the amount of \$4,746.37, plus the cost of probation.

#### SECOND CAUSE FOR DISCIPLINE

(Unprofessional Conduct - Commission of Acts Involving Moral Turpitude, Dishonesty, Fraud, Deceit & Corruption)

26. Respondent is subject to disciplinary action under section 4301, subdivision (f) of the Code in that on or about and between June 1, 2008 and July 11, 2008, Respondent stole controlled substances and dangerous drugs from her employer using fraud, deceit, and dishonesty, as detailed in paragraphs 22 to 24, above. Such conduct is substantially related to the qualifications, duties, and functions of a pharmacy technician.

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### THIRD CAUSE FOR DISCIPLINE

# (Unprofessional Conduct - Violation of California Statutes Regulating Controlled Substances & Dangerous Drugs)

27. Respondent is subject to disciplinary action under section 4301, subdivision (j) of the Code in that on or about on or about and between June 1, 2008 and July 11, 2008, Respondent knowingly violated Business and Professions Code section 4059(a) regulating controlled substances and dangerous drugs, as detailed in paragraphs 22 to 24, above. Such conduct is substantially related to the qualifications, duties, and functions of a pharmacy technician.

# FOURTH CAUSE FOR DISCIPLINE

# (Unprofessional Conduct - Violating Federal & State Laws & Regulations Governing Pharmacy)

28. Respondent is subject to disciplinary action under section 4301, subdivision (o) of the Code in that on or about and between June 1, 2008 and July 11, 2008, Respondent violated Title 21 U.S.C. section 843, subdivision (a)(3), Board of Pharmacy Regulations (California Code of Regulations, Title 16, Section 1700, et seq.), and the California Uniform Controlled Substances Act (Health and Safety Code 11000, et seq., including sections 11158(a), 11173(a), and 11351), as detailed in paragraphs 22 to 24, above.

#### 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:

- 1. Revoking or suspending Pharmacy Technician Registration Number TCH 83365, issued to Elisajoy Espiritu Ramos;
- Ordering Elisajoy Espiritu Ramos 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:

	3. Taking such other and further action as deemed necessary and proper
1	3. Taking such other and further action as deemed necessary and proper.
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3	DATED: 10/14/09 (legina Werld)
5	VIRGINIA) HEROLD  Executive Officer
6	Board of Pharmacy Department of Consumer Affairs State of California
7	State of California Complainant
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9	3D2009803920
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