

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

In the Matter of the First-Amended Accusation
Against:

Case No. 3368

DERRICK WAYNE WHITE
446 W. 106TH Street
Los Angeles, CA 90003

Pharmacy Technician License No. TCH 56617

Respondent.

DECISION AND ORDER

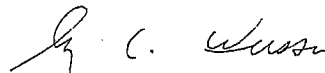
The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This decision shall become effective on January 7, 2011.

It is so ORDERED December 8, 2010.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By



STANLEY C. WEISSER
Board President

1 EDMUND G. BROWN JR.
Attorney General of California
2 GREGORY J. SALUTE
Supervising Deputy Attorney General
3 ALVARO MEJIA
Deputy Attorney General
4 State Bar No. 216956
300 So. Spring Street, Suite 1702
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Attorneys for Complainant

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

10 In the Matter of the First-Amended Accusation
11 Against:

Case No. 3368

12 **Derrick Wayne White**
13 **446 W. 106th Street**
Los Angeles, CA 90003

OAH No. L-2009120435

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

14 **Pharmacy Technician License No.**
15 **TCH 56617**

16 Respondent.

17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
19 proceeding that the following matters are true:

20 **PARTIES**

21 1. Virginia Herold (Complainant) is the Executive Officer of the Board of Pharmacy.
22 She brought this action solely in her official capacity and is represented in this matter by Edmund
23 G. Brown Jr., Attorney General of the State of California, by Alvaro Mejia, Deputy Attorney
24 General.

25 2. Derrick Wayne White (Respondent) is representing himself in this proceeding and
26 has chosen not to exercise his right to be represented by counsel.

27 3. On or about February 24, 2005, the Board of Pharmacy issued Pharmacy Technician
28 License No. TCH 56617 to Derrick Wayne White. The Pharmacy Technician License was in full

1 force and effect at all times relevant to the charges brought herein and will expire on July 31,
2 2010, unless renewed.

3 **JURISDICTION**

4 4. Accusation No. 3368 was filed before the Board of Pharmacy (Board) Department of
5 Consumer Affairs, and is currently pending against Respondent. The Accusation and all other
6 statutorily required documents were properly served on Respondent on October 15, 2009.
7 Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation
8 No. 3368 is attached as exhibit A and incorporated herein by reference. First-Amended
9 Accusation No. 3368 was filed on June 10, 2010 and personally served on Respondent on the
10 same date. A copy of First-Amended Accusation No. 3368 is attached as exhibit B and
11 incorporated herein by reference.

12 **ADVISEMENT AND WAIVERS**

13 5. Respondent has carefully read, and understands the charges and allegations in First-
14 Amended Accusation No. 3368. Respondent also has carefully read, and understands the effects
15 of this Stipulated Surrender of License and Order.

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

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

25 **CULPABILITY**

26 8. Respondent understands that the charges and allegations in First-Amended
27 Accusation No. 3368, if proven at a hearing, constitute cause for imposing discipline upon his
28 Pharmacy Technician License.

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9. For the purpose of resolving the First-Amended Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the charges in the First-Amended Accusation and that those charges constitute cause for discipline. Respondent hereby gives up his right to contest that cause for discipline exists based on those charges.

10. Respondent understands that by signing this stipulation he enables the Board to issue an order accepting the surrender of his Pharmacy Technician License without further process.

RESERVATION

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

CONTINGENCY

12. 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. By signing the stipulation, Respondent understands and agrees that he may not withdraw his 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.

13. 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.

14. 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,

1 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
2 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
3 executed by an authorized representative of each of the parties.

4 15. In consideration of the foregoing admissions and stipulations, the parties agree that
5 the (Board) may, without further notice or formal proceeding, issue and enter the following
6 Order:

7 **ORDER**

8 IT IS HEREBY ORDERED that Pharmacy Technician License No. TCH 56617, issued to
9 Respondent Derrick Wayne White, is surrendered and accepted by the Board of Pharmacy.

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

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

16 18. Respondent shall cause to be delivered to the Board both his wall license certificate
17 and, if one was issued, pocket license on or before the effective date of the Decision and Order.

18 19. Respondent understands and agrees that if he ever files an application for licensure or
19 a petition for reinstatement in the State of California, the Board shall treat it as a new application
20 for licensure.

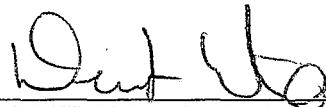
21 20. Respondent may not apply for any license, permit, or registration from the Board for
22 three (3) years from the effective date of this decision. Respondent stipulates that should he apply
23 for any license from the Board on or after the effective date of this decision, all allegations set
24 forth in First-Amended Accusation No. 3368 shall be deemed to be true, correct and admitted by
25 Respondent when the Board determines whether to grant or deny the application. Respondent
26 shall satisfy all requirements applicable to that license as of the date the application is submitted
27 to the Board, including, but not limited to certification by a nationally recognized body prior to
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1 the issuance of a new license. Respondent is required to report this surrender as disciplinary
2 action.

3 21. Respondent shall pay the Board its costs of investigation and enforcement in the
4 amount of \$3,100.25 prior to issuance of a new or reinstated license.

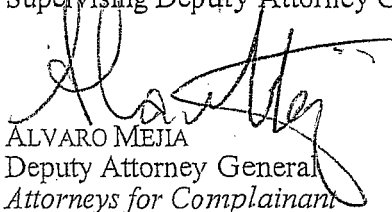
5 ACCEPTANCE

6 I have carefully read the Stipulated Surrender of License and Order. I understand the
7 stipulation and the effect it will have on my Pharmacy Technician License. I enter into this
8 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to
9 be bound by the Decision and Order of the Board of Pharmacy.

10
11 DATED: 7-30-10 
12 DERRICK WAYNE WHITE
13 Respondent

14 ENDORSEMENT

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

17 Dated: July 28, 2010
18
19 Respectfully submitted,
20 EDMUND G. BROWN JR.
21 Attorney General of California
22 GREGORY J. SALUTE
23 Supervising Deputy Attorney General

24 ALVARO MEJIA
25 Deputy Attorney General
26 *Attorneys for Complainant*

24 DOJ Matter ID: LA2009603136
25 50705266.doc

Exhibit A

Accusation No. 3368

1 EDMUND G. BROWN JR.
Attorney General of California
2 GLORIA A. BARRIOS
Supervising Deputy Attorney General
3 KRISTI GUDOSKI COOK
Deputy Attorney General
4 State Bar No. 185257
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 620-6343
6 Facsimile: (213) 897-2804

7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. 3368

12 Derrick Wayne White
446 W. 106th
13 Los Angeles, CA 90003

ACCUSATION

14 Pharmacy Technician License No.
TCH 56617

15 Respondent.
16

17 Complainant alleges:

18 PARTIES

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

21 2. On or about February 24, 2005, the Board of Pharmacy (Board) issued Pharmacy
22 Technician License Number TCH 56617 to Derrick Wayne White (Respondent). The Pharmacy
23 Technician License was in full force and effect at all times relevant to the charges brought herein
24 and will expire on July 31, 2010, unless renewed.

25 JURISDICTION

26 3. This Accusation is brought before the Board under the authority of the following
27 laws. All section references are to the Business and Professions Code unless otherwise indicated.

28 ///

1 4. Section 4300 states, in pertinent part: "Every license issued may be suspended or
2 revoked."

3 5. Section 4301 states, in pertinent part:

4 "The board shall take action against any holder of a license who is guilty of unprofessional
5 conduct or whose license has been procured by fraud or misrepresentation or issued by mistake.

6 Unprofessional conduct shall include, but is not limited to, any of the following:

7

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

10 6. Health and Safety Code section 11357, subdivision (c), states: "Except as authorized
11 by law, every person who possesses more than 28.5 grams of marijuana, other than concentrated
12 cannabis, shall be punished by imprisonment in the county jail for a period of not more than six
13 months or by a fine of not more than five hundred dollars (\$500), or by both such fine and
14 imprisonment."

15 7. Health and Safety Code section 11359 states: "Every person who possesses for sale
16 any marijuana, except as otherwise provided by law, shall be punished by imprisonment in the
17 state prison.

18 8. Health and Safety Code section 11360, subdivision (a), states: "Except as otherwise
19 provided by this section or as authorized by law, every person who transports, imports into this
20 state, sells, furnishes, administers, or gives away, or offers to transport, import into this state, sell,
21 furnish, administer, or give away, or attempts to import into this state or transport any marijuana
22 shall be punished by imprisonment in the state prison for a period of two, three or four years."

23 CONTROLLED SUBSTANCE

24 9. Marijuana is a Schedule I controlled substance as designated by Health and Safety
25 Code section 11054, subdivisions (a) and (d)(13).

26 COST RECOVERY PROVISION

27 10. Section 125.3 provides, in pertinent part, that the Board may request the
28 administrative law judge to direct a licentiate found to have committed a violation or violations of

1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
2 enforcement of the case.

3 CAUSE FOR DISCIPLINE

4 (Unprofessional Conduct/Violation of Statutes Regulating Controlled Substances)

5 11. Respondent is subject to disciplinary action section 4301, subdivision (j), in
6 conjunction with Health and Safety Code sections 11357, 11359 and 11360, for violating statutes
7 regulating controlled substances. The circumstances are as follows:

8 a. On or about August 30, 2007, a Los Angeles Police Department detective and officer
9 from the Southeast Division, Narcotics Enforcement Detail, responded to a residence based on a
10 citizen complaint that narcotics were being sold there. That residence is Respondent's address of
11 record with the Board, listed on the caption page of this Accusation. From outside the residence,
12 the detective observed the following: A woman approached the residence and knocked on the
13 door. Respondent opened the door. The woman handed Respondent money. Respondent handed
14 the woman an object, which she received in her right hand.

15 b. The detective and officer followed the woman as she walked away from the
16 residence, and approached her. The officer observed in the woman's right hand a clear plastic
17 baggie which appeared to contain marijuana. The officer recovered the baggie from the woman,
18 and she was placed under arrest for possession of marijuana.

19 c. After Respondent exited the residence, he was placed under arrest for sale of
20 marijuana in violation of Health and Safety Code section 11360, subdivision (a). The police
21 searched a vehicle registered to Respondent and the residence. From Respondent's vehicle, the
22 police recovered one plastic baggie containing a green, leafy substance resembling marijuana.
23 From inside the residence, the police recovered four plastic baggies containing a green, leafy
24 substance resembling marijuana. Respondent wrote and signed a statement admitting that the
25 four bags of "weed" in the residence belonged to him. The police formed the opinion that
26 Respondent possessed the marijuana for sale in violation of Health and Safety Code section
27 11359.

28 ///

1 d. On or about March 21, 2008, Respondent was charged with one misdemeanor count
2 of possession of more than 28.5 grams of marijuana in violation of Health and Safety Code
3 section 11357, subdivision (c), in the criminal proceeding entitled *The People of the State of*
4 *California v. Derrick Wayne White* (Super. Ct., L.A. County, 2008, No. 8CA05792). Pursuant to
5 a motion by the People, Respondent paid a court fine of \$250, and the court dismissed the case
6 pursuant to Penal Code section 1385.

7 PRAYER

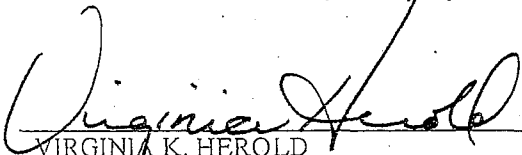
8 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
9 and that following the hearing, the Board issue a decision:

10 1. Revoking or suspending Pharmacy Technician License Number TCH 56617, issued
11 to Derrick Wayne White.

12 2. Ordering Derrick Wayne White to pay the Board the reasonable costs of the
13 investigation and enforcement of this case, pursuant to Business and Professions Code section
14 125.3; and

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

16
17 DATED: 10/5/09


18 VIRGINIA K. HEROLD
19 Executive Officer
20 Board of Pharmacy
21 Department of Consumer Affairs
22 State of California
23 Complainant

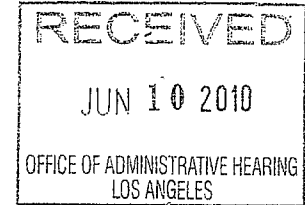
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Exhibit B

First-Amended Accusation No. 3368

1 EDMUND G. BROWN JR.
Attorney General of California
2 GREGORY J. SALUTE
Supervising Deputy Attorney General
3 ALVARO MEJIA
Deputy Attorney General
4 State Bar No. 216956
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-0083
6 Facsimile: (213) 897-2804

7 *Attorneys for Complainant*



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

11 In the Matter of the Accusation Against:

12 **Derrick Wayne White**
13 **446 W. 106th**
Los Angeles, CA 90003

14 **Pharmacy Technician License No.**
15 **TCH 56617**

16 Respondent.

Case No. 3368

OAH No. L-2009120435

FIRST-AMENDED

A C C U S A T I O N

17 Complainant alleges:

18 **PARTIES**

- 19 1. Virginia K. Herold (Complainant) brings this Accusation solely in her official
20 capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.
- 21 2. On or about February 24, 2005, the Board of Pharmacy (Board) issued Pharmacy
22 Technician License Number TCH 56617 to Derrick Wayne White (Respondent). The Pharmacy
23 Technician License was in full force and effect at all times relevant to the charges brought herein
24 and will expire on July 31, 2010, unless renewed.

25 ///

26 ///

27 ///

28 ///

JURISDICTION

1
2 3. This Accusation is brought before the Board under the authority of the following
3 laws. All section references are to the Business and Professions Code unless otherwise indicated.

4 4. Section 4300 states, in pertinent part: "Every license issued may be suspended or
5 revoked."

6 5. Section 4301 states, in pertinent part:

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

10

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

14 "(g) Knowingly making or signing any certificate or other document that falsely represents
15 the existence or nonexistence of a state of facts.

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

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20 "(p) Actions or conduct that would have warranted denial of a license."

21 6. Health and Safety Code section 11357, subdivision (c), states: "Except as authorized
22 by law, every person who possesses more than 28.5 grams of marijuana, other than concentrated
23 cannabis, shall be punished by imprisonment in the county jail for a period of not more than six
24 months or by a fine of not more than five hundred dollars (\$500), or by both such fine and
25 imprisonment."

26 7. Health and Safety Code section 11359 states: "Every person who possesses for sale
27 any marijuana, except as otherwise provided by law, shall be punished by imprisonment in the
28 state prison.

1 8. Health and Safety Code section 11360, subdivision (a), states: "Except as otherwise
2 provided by this section or as authorized by law, every person who transports, imports into this
3 state, sells, furnishes, administers, or gives away, or offers to transport, import into this state, sell,
4 furnish, administer, or give away, or attempts to import into this state or transport any marijuana
5 shall be punished by imprisonment in the state prison for a period of two, three or four years."

6 **CONTROLLED SUBSTANCE**

7 9. Marijuana is a Schedule I controlled substance as designated by Health and Safety
8 Code section 11054, subdivisions (a) and (d)(13).

9 **COST RECOVERY PROVISION**

10 10. Section 125.3 provides, in pertinent part, that the Board may request the
11 administrative law judge to direct a licensee found to have committed a violation or violations of
12 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
13 enforcement of the case.

14 **FIRST CAUSE FOR DISCIPLINE**

15 **(Procuring a License by Fraud or Misrepresentation)**

16 11. Respondent is subject to disciplinary action under section 4301, subdivision (f), in that he
17 knowingly made a false statement of fact required to be revealed in his 2004 application for
18 registration as a pharmacy technician. In said application, Respondent failed to disclose his
19 November 6, 2000 convictions, as more fully set forth in paragraph 14 (a).

20 **SECOND CAUSE FOR DISCIPLINE**

21 **(Unprofessional Conduct)**

22 12. Respondent is subject to disciplinary action under section 4301, subdivisions (g), in that
23 Respondent committed an act of unprofessional conduct. Complainant refers to and by reference
24 incorporates the allegations set forth above in paragraph 11, as though set forth fully.

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THIRD CAUSE FOR DISCIPLINE

(Unprofessional Conduct/Violation of Statutes Regulating Controlled Substances)

13. Respondent is subject to disciplinary action under section 4301, subdivision (j), in conjunction with Health and Safety Code sections 11357, 11359 and/or 11360, for violating statutes regulating controlled substances. The circumstances are as follows:

a. On or about August 30, 2007, a Los Angeles Police Department detective and officers from the Southeast Division, Narcotics Enforcement Detail, responded to a residence based on a citizen complaint that narcotics were being sold there. That residence is Respondent's address of record with the Board, listed on the caption page of this Accusation. From outside the residence, the detective observed the following: A woman approached the residence and knocked on the door. Respondent opened the door. The woman handed Respondent money. Respondent handed the woman an object, which she received in her right hand.

b. The detective and officer followed the woman as she walked away from the residence, and approached her. The officer observed in the woman's right hand a clear plastic baggie which appeared to contain marijuana. The officer recovered the baggie from the woman, and she was placed under arrest for possession of marijuana.

c. After Respondent exited the residence, he was placed under arrest for sale of marijuana in violation of Health and Safety Code section 11360, subdivision (a). The police searched a vehicle registered to Respondent and the residence. From Respondent's vehicle, the police recovered one plastic baggie containing a green, leafy substance resembling marijuana. From inside the residence, the police recovered four plastic baggies containing a green, leafy substance resembling marijuana. Respondent wrote and signed a statement admitting that the four bags of "weed" in the residence belonged to him. The police formed the opinion that Respondent possessed the marijuana for sale in violation of Health and Safety Code section 11360(a), a felony.

d. On or about March 21, 2008, Respondent was charged with one misdemeanor count of possession of more than 28.5 grams of marijuana in violation of Health and Safety Code section 11357, subdivision (c), in the criminal proceeding entitled *The People of the State of*

1 *California v. Derrick Wayne White* (Super. Ct., L.A. County, 2008, No. 8CA05792). Pursuant to
2 a motion by the People, Respondent paid a court fine of \$250, and the court dismissed the case
3 pursuant to Penal Code section 1385.

4 **FOURTH CAUSE FOR DISCIPLINE**

5 **(Unprofessional Conduct/Violation of Statutes Regulating Controlled Substances)**

6 14. Respondent is subject to disciplinary action under section 4301, subdivision (j), in
7 conjunction with Health and Safety Code sections 11357, 11359 and/or 11360, for violating
8 statutes regulating controlled substances. The circumstances are as follows:

9 a. On or about December 20, 2007, a Los Angeles Police Department detective and officers
10 from the Southeast Division, Narcotics Enforcement Detail conducted an investigation into the
11 possession and sale of marijuana by Respondent. After said investigation, the police formed the
12 opinion that Respondent possessed the marijuana for sale in violation of Health and Safety Code
13 section 11359, a felony.

14 **DISCIPLINE CONSIDERATIONS**

15 15. To determine the degree of discipline, Complainant alleges that Respondent has had
16 prior criminal convictions, as follows:

17 a. On or about November 6, 2000, in a criminal proceeding entitled *The People of the*
18 *State of California v. Derrick Wayne White* in the Municipal Court of El Monte Courthouse
19 Judicial District, County of Los Angeles, State of California, Case Number 92M04960,
20 Respondent was convicted of violating Vehicle Code section 23152(a) (driving under the
21 influence of alcohol or drugs), a misdemeanor; of violating Vehicle Code section 14601.1(a)
22 (driving while license suspended), a misdemeanor; of violating Penal Code section 148.9(a) (false
23 identification to peace officer), a misdemeanor.

24 b. On or about January 24, 2001, in a criminal proceeding entitled *The People of the*
25 *State of California v. Derrick Wayne White* in the Superior Court of California, County of Los
26 Angeles, Case Number BA209101, Respondent was convicted of violating Penal Code section
27 273.5(a) (inflict corporal injury on spouse/cohabitant), a felony.

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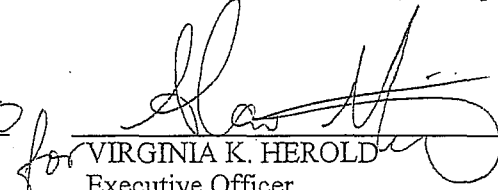
PRAYER

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

1. Revoking or suspending Pharmacy Technician License Number TCH 56617, issued to Derrick Wayne White.

2. Ordering Derrick Wayne White to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and

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

DATED: *June 10, 2010* for 
VIRGINIA K. HEROLD
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

DOJ Matter ID: LA2009603136
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