

RECEIVED BY CALIF.  
BOARD OF PHARMACY

2010 MAR 25 AM 10: 50

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

In the Matter of the Accusation Against:

Case No. 3422

**CHASIDY T. R. WOOD A.K.A.  
CHASIDY T. ROMETTI WOOD A.K.A.  
CHASIDY TERRIE ROMETTI WOOD  
A.K.A.**

**DEFAULT DECISION AND ORDER**

**CHASIDY WOOD A.K.A.  
CHASSIDY WOOD A.K.A.  
CHASSIDY T. WOOD A.K.A.  
CHASIDY T. ROMETTI A.K.A.  
CHASSIDY T. ROMETTI A.K.A.  
CHASIDY TERRIE WOOD A.K.A.  
CHASSIDY TERRIE WOOD**

[Gov. Code, §11520]

3785 Henshaw Rd.  
West Sacramento, CA 95691

**Pharmacy Technician Registration  
No. TCH 45272**

Respondent.

FINDINGS OF FACT

1. On or about February 9, 2010, Complainant Virginia Herold, in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs, filed Accusation No. 3422 against Chasidy T. R. Wood a.k.a. Chasidy T. Rometti Wood a.k.a. Chasidy Terrie Rometti Wood a.k.a. Chasidy Wood a.k.a. Chassidy Wood a.k.a. Chassidy T. Wood a.k.a. Chasidy T. Rometti a.k.a. Chassidy T. Rometti a.k.a. Chasidy Terrie Wood a.k.a. Chassidy Terrie Wood (Respondent) before the Board of Pharmacy.

1           2.     On or about February 19, 2003, the Board of Pharmacy (Board) issued Pharmacy  
2 Technician Registration No. TCH 45272 (License) to Respondent. The License was in full force  
3 and effect at all times relevant to the charges brought herein and will expire on January 31, 2011,  
4 unless renewed.

5           3.     On or about February 25, 2010, C. Cruz, an employee of the Department of Justice,  
6 served by Certified and First Class Mail a copy of the Accusation No. 3422 (Accusation),  
7 Statement to Respondent, Notice of Defense, Request for Discovery, and Government Code  
8 sections 11507.5, 11507.6, and 11507.7 to Respondent's address of record with the Board, which  
9 was and is: 3785 Henshaw Rd., West Sacramento, CA 95691. A copy of the Accusation is  
10 attached as exhibit A, and is incorporated herein by reference.

11           4.     Service of the Accusation was effective as a matter of law under the provisions of  
12 Government Code section 11505, subdivision (c).

13           5.     Government Code section 11506 states, in pertinent part:

14                   (c) The respondent shall be entitled to a hearing on the merits if the respondent  
15 files a notice of defense, and the notice shall be deemed a specific denial of all parts  
16 of the accusation not expressly admitted. Failure to file a notice of defense shall  
constitute a waiver of respondent's right to a hearing, but the agency in its discretion  
may nevertheless grant a hearing.

17           6.     Respondent failed to file a Notice of Defense within 15 days after service upon her of  
18 the Accusation, and therefore waived her right to a hearing on the merits of the Accusation.

19           7.     Government Code section 11520 states, in pertinent part:

20                   (a) If the respondent either fails to file a notice of defense or to appear at the  
21 hearing, the agency may take action based upon the respondent's express admissions  
22 or upon other evidence and affidavits may be used as evidence without any notice to  
respondent.

23           8.     Pursuant to its authority under Government Code section 11520, the Board finds  
24 Respondent is in default. The Board will take action without further hearing and, based on the  
25 evidence on file herein, finds that the allegations in the Accusation are true.

26           9.     The total cost for investigation and enforcement in connection with the Accusation  
27 are \$2,210.00 as of March 12, 2010.

28     ///

DETERMINATION OF ISSUES

1  
2       1.   Based on the foregoing findings of fact, Respondent has subjected her License to  
3 discipline.

4       2.   A copy of the Accusation is attached.

5       3.   The agency has jurisdiction to adjudicate this case by default.

6       4.   The Board is authorized to revoke Respondent's License based upon the following  
7 violations alleged in the Accusation:

8           a.   Respondent violated Business and Professions Code (Code) section 4301,  
9 subd. (l) in that Respondent was convicted of crimes substantially related to her  
10 License and her practice as a pharmacy technician.

11           b.   Respondent violated Code section 4301, subs. (j) and (o) in that  
12 Respondent violated the statutes of this state regulating controlled substances and  
13 dangerous drugs, namely Code section 4060 and/or Health and Safety Code section  
14 11377, subd. (a), by possessing a controlled substance without a prescription.

15           c.   Respondent violated Code section 4301, subd. (p) in that Respondent  
16 engaged in conduct that would have warranted the denial of her License.

17 ///

18 ///

19 ///

20

21

22

23

24

25

26

27

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

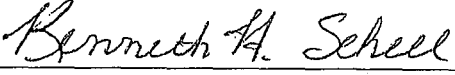
ORDER

IT IS SO ORDERED that Pharmacy Technician Registration No. TCH 45272, heretofore issued to Respondent is revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on June 23, 2010.

It is so ORDERED May 24, 2010.

  
\_\_\_\_\_  
KENNETH H. SCHELL, BOARD PRESIDENT  
FOR THE BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS

10548979.DOC  
DOJ docket number:SA2009101835

Attachment:

Exhibit A: Accusation No. 3422

Exhibit A  
Accusation No. 3422

1 EDMUND G. BROWN JR.  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 GEOFFREY S. ALLEN  
Deputy Attorney General  
4 State Bar No. 193338  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 324-5341  
Facsimile: (916) 327-8643  
7 E-mail: Geoffrey.Allen@doj.ca.gov  
*Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. 3422

12  
13 **CHASIDY T. R. WOOD A.K.A.**  
**CHASIDY T. ROMETTI WOOD A.K.A.**  
14 **CHASIDY TERRIE ROMETTI WOOD A.K.A.**  
**CHASIDY WOOD A.K.A.**  
15 **CHASSIDY WOOD A.K.A.**  
**CHASSIDY T. WOOD A.K.A.**  
16 **CHASIDY T. ROMETTI A.K.A.**  
17 **CHASSIDY T. ROMETTI A.K.A.**  
**CHASIDY TERRIE WOOD A.K.A.**  
18 **CHASSIDY TERRIE WOOD**  
3785 Henshaw Rd.  
19 West Sacramento, CA 95691

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

20 **Pharmacy Technician Registration**  
21 **No. TCH 45272**

22 Respondent.

23 Complainant alleges:

24 **PARTIES**

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

27 ///

1 2. On or about February 19, 2003, the Board of Pharmacy issued Pharmacy Technician  
2 Registration Number TCH 45272 (License) to Chasidy T. R. Wood a.k.a. Chasidy T. Rometti  
3 Wood a.k.a. Chasidy Terrie Rometti Wood a.k.a. Chasidy Wood a.k.a. Chassidy Wood a.k.a.  
4 Chassidy T. Wood a.k.a. Chasidy T. Rometti a.k.a. Chassidy T. Rometti a.k.a. Chasidy Terrie  
5 Wood a.k.a. Chassidy Terrie Wood (Respondent). The License was in full force and effect at all  
6 times relevant to the charges brought herein and will expire on January 31, 2011, unless renewed.

7 JURISDICTION

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

11 4. Section 4300 of the Code states, in pertinent part:

12 (a) Every license issued may be suspended or revoked.

13 (b) The board shall discipline the holder of any license issued by the board,  
14 whose default has been entered or whose case has been heard by the board and found  
15 guilty, by any of the following methods:

- 16 (1) Suspending judgment.
- 17 (2) Placing him or her upon probation.
- 18 (3) Suspending his or her right to practice for a period not exceeding one  
19 year.
- 20 (4) Revoking his or her license.
- 21 (5) Taking any other action in relation to disciplining him or her as the  
22 board in its discretion may deem proper.

23 .....

24 (e) The proceedings under this article shall be conducted in accordance with  
25 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the  
26 Government Code, and the board shall have all the powers granted therein. The  
27 action shall be final, except that the propriety of the action is subject to review by the  
28 superior court pursuant to Section 1094.5 of the Code of Civil Procedure.

5. Section 4301 of the Code states, in pertinent part:

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:

.....

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

3 . . . .

4 (l) The conviction of a crime substantially related to the qualifications,  
5 functions, and duties of a licensee under this chapter. The record of conviction of a  
6 violation of Chapter 13 (commencing with Section 801) of Title 21 of the United  
7 States Code regulating controlled substances or of a violation of the statutes of this  
8 state regulating controlled substances or dangerous drugs shall be conclusive  
9 evidence of unprofessional conduct. In all other cases, the record of conviction shall  
10 be conclusive evidence only of the fact that the conviction occurred. The board may  
11 inquire into the circumstances surrounding the commission of the crime, in order to  
12 fix the degree of discipline or, in the case of a conviction not involving controlled  
13 substances or dangerous drugs, to determine if the conviction is of an offense  
14 substantially related to the qualifications, functions, and duties of a licensee under this  
15 chapter. A plea or verdict of guilty or a conviction following a plea of nolo  
16 contendere is deemed to be a conviction within the meaning of this provision. The  
17 board may take action when the time for appeal has elapsed, or the judgment of  
18 conviction has been affirmed on appeal or when an order granting probation is made  
19 suspending the imposition of sentence, irrespective of a subsequent order under  
20 Section 1203.4 of the Penal Code allowing the person to withdraw his or her plea of  
21 guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or  
22 dismissing the accusation, information, or indictment.

23 . . . .

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

28 . . . .

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

. . . .

6. Section 4022 of the Code provides, in pertinent part,

"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

///





1 Ct. Sacramento County, 2008, Case No. 08M06089), Respondent was convicted on her plea of  
2 nolo contendere of violating Penal Code section 415, subd. (2), (disturbing the peace), a  
3 misdemeanor. The circumstances of the crime are that on or about May 23, 2008, Respondent  
4 repeatedly used profanity and fighting words towards her roommates in the presence of Deputy  
5 Marko Radonjic of the Sacramento County Sheriff's Department. The Deputy repeatedly  
6 admonished Respondent to stop using profanity and fighting words because she was  
7 unnecessarily escalating the situation with her roommates. Respondent refused to comply with the  
8 Deputy's directives and was arrested in order to protect the peace. This crime is substantially  
9 related to the functions, qualifications, and duties of a pharmacy technician.

10 12. On or about June 18, 2009, in the Superior Court of California, County of  
11 Sacramento, in the case entitled, *People of the State of California v. Chassidy Wood* (Super. Ct.  
12 Sacramento County, 2009, Case No. 09M05971), Respondent was convicted on her plea of nolo  
13 contendere of violating Health and Safety Code section 11377, subd. (a), (unlawful possession of  
14 a controlled substance); and Vehicle Code section 14601.1, subd. (a) (driving with a suspended  
15 license), both misdemeanors. The circumstances of the crime are that on or about June 16, 2009,  
16 Respondent was stopped in her vehicle by Deputy Andrew Theodore of the Sacramento County  
17 Sheriff's Department. Deputy Theodore observed Respondent blocking traffic in her vehicle on a  
18 county road. The Deputy asked Respondent for identification and Respondent indicated that she  
19 was driving on a suspended license. Respondent consented to a search of her vehicle.  
20 Methamphetamine and a glass pipe was located in Respondent's purse. Respondent was arrested  
21 for violating Health and Safety Code sections 11377, subd. (a), (unlawful possession of a  
22 controlled substance) and 11364 (possession of controlled substance paraphernalia); and Vehicle  
23 Code section 14601.1, subd. (a) (driving with a suspended license). These crimes are  
24 substantially related to the functions, qualifications, and duties of a pharmacy technician.

#### 25 SECOND CAUSE FOR DISCIPLINE

26 (Unlawful Possession of a Controlled Substance - Methamphetamine)

27 13. Respondent is subject to disciplinary action under Code section 4301, subs. (j) and  
28 (o) in that Respondent violated the statutes of this state regulating controlled substances and

1 dangerous drugs, namely Code section 4060 and/or Health and Safety Code section 11377, subd.  
2 (a), by possessing a controlled substance without a prescription. The circumstances are detailed  
3 above in paragraph 12.

4 THIRD CAUSE FOR DISCIPLINE

5 (Actions Warranting Denial of License)

6 14. Respondent is subject to disciplinary action under Code section 4301, subd. (p) in that  
7 Respondent engaged in conduct that would have warranted the denial of her License. The  
8 circumstances are detailed above in paragraphs 12 and 13.

9 PRAYER

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

12 1. Revoking or suspending Pharmacy Technician Registration Number TCH 45272,  
13 issued to Respondent.

14 2. Ordering Respondent to pay the Board of Pharmacy the reasonable costs of the  
15 investigation and enforcement of this case, pursuant to Business and Professions Code section  
16 125.3;

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

18 DATED: 2/9/10

19   
VIRGINIA NEROLD

20 Executive Officer  
21 Board of Pharmacy  
22 Department of Consumer Affairs  
State of California  
Complainant

23 SA2009101835  
24 10514186.doc

**DECLARATION OF SERVICE BY CERTIFIED MAIL AND FIRST CLASS MAIL**  
(Separate Mailings)

**Case Name:** In the Matter of the Accusation Against: CHASIDY T.R. WOOD

**Case No.:** 3422

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On February 25, 2010, I served the attached **ACCUSATION; STATEMENT TO RESPONDENT; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 copies); AND GOVERNMENT CODE SECTIONS** by placing a true copy thereof enclosed in a sealed envelope as certified mail with postage thereon fully prepaid and return receipt requested, and another true copy of the **ACCUSATION; STATEMENT TO RESPONDENT; REQUEST FOR DISCOVERY; NOTICE OF DEFENSE (2 copies); AND GOVERNMENT CODE SECTIONS** was enclosed in a second sealed envelope as first class mail with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 1300 J Street, Suite 125 P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

7160 3901 9848 7098 0567

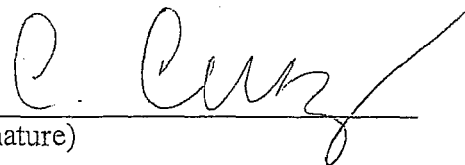
**TO:**  
CHASIDY T.R. WOOD  
3785 Henshaw Road  
West Sacramento, CA 95691

**Certified Article Number**  
7160 3901 9848 7098 0567  
**SENDER'S RECORD**

the laws of the State of California the foregoing is true & executed on February 25, 2010, at Sacramento,

**SENDER:** Geoffrey S. Allen, DAG

**REFERENCE:** 03583110SA2009101835

  
(Signature)

PS Form 3800, January 2005

RETURN RECEIPT SERVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

US Postal Service  
**Receipt for Certified Mail**  
No Insurance Coverage Provided  
Do Not Use for International Mail

POSTMARK OR DATE

1 EDMUND G. BROWN JR.  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 GEOFFREY S. ALLEN, State Bar No. 193338  
Deputy Attorney General  
4 1300 I Street, Suite 125  
P.O. Box 944255  
5 Sacramento, CA 94244-2550  
Telephone: (916) 324-5341  
6 Facsimile: (916) 327-8643

7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

Case No. 3422

13 **CHASIDY T. R. WOOD A.K.A.**  
14 **CHASSIDY T. ROMETTI WOOD A.K.A.**  
15 **CHASIDY TERRIE ROMETTI WOOD**  
16 **A.K.A.**  
17 **CHASIDY WOOD A.K.A.**  
18 **CHASSIDY WOOD A.K.A.**  
19 **CHASSIDY T. WOOD A.K.A.**  
20 **CHASIDY T. ROMETTI A.K.A.**  
21 **CHASSIDY T. ROMETTI A.K.A.**  
22 **CHASIDYTERRIE WOOD A.K.A.**  
23 **CHASSIDY TERRIE WOOD**  
24 3785 Henshaw Rd.  
25 West Sacramento, CA 95691

**STATEMENT TO RESPONDENT**

[Gov. Code §§ 11504, 11505(b)]

26 **Pharmacy Technician Registration No. TCH**  
27 **45272**

28 Respondent.

TO RESPONDENT:

Enclosed is a copy of the Accusation that has been filed with the Board of Pharmacy (Board), and which is hereby served on you.

Unless a written request for a hearing signed by you or on your behalf is delivered or mailed to the Board of Pharmacy within fifteen (15) days after a copy of the Accusation was

1 personally served on you or mailed to you, you will be deemed to have waived your right to a  
2 hearing in this matter and the Board of Pharmacy may proceed upon the Accusation without a  
3 hearing and may take action thereon as provided by law.

4 The request for hearing may be made by delivering or mailing one of the enclosed forms  
5 entitled "Notice of Defense," or by delivering or mailing a Notice of Defense as provided in  
6 section 11506 of the Government Code, to

7  
8 Geoffrey S. Allen  
9 Deputy Attorney General  
10 1300 I Street, Suite 125  
11 P.O. Box 944255  
12 Sacramento, CA 94244-2550

13 You may, but need not, be represented by counsel at any or all stages of these proceedings.

14 The enclosed Notice of Defense, if signed and filed with the Board, shall be deemed a  
15 specific denial of all parts of the Accusation, but you will not be permitted to raise any objection  
16 to the form of the Accusation unless you file a further Notice of Defense as provided in section  
17 11506 of the Government Code within fifteen (15) days after service of the Accusation on you.

18 If you file any Notice of Defense within the time permitted, a hearing will be held on the  
19 charges made in the Accusation.

20 The hearing may be postponed for good cause. If you have good cause, you are obliged to  
21 notify the Office of Administrative Hearings, Attn: General Jurisdiction, 2349 Gateway Oaks,  
22 Suite 200, Sacramento, CA 95833-4231, within ten (10) working days after you discover the  
23 good cause. Failure to notify the Office of Administrative Hearings within ten (10) days will  
24 deprive you of a postponement.

25 Copies of sections 11507.5, 11507.6, and 11507.7 of the Government Code are enclosed.

26 If you desire the names and addresses of witnesses or an opportunity to inspect and copy  
27 the items mentioned in section 11507.6 of the Government Code in the possession, custody or  
28 control of the Board you may send a Request for Discovery to the Board of Pharmacy.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

NOTICE REGARDING STIPULATED SETTLEMENTS


It may be possible to avoid the time, expense and uncertainties involved in an administrative hearing by disposing of this matter through a stipulated settlement. A stipulated settlement is a binding written agreement between you and the government regarding the matters charged and the discipline to be imposed. Such a stipulation would have to be approved by the Board of Pharmacy but, once approved, it would be incorporated into a final order.

Any stipulation must be consistent with the Board of Pharmacy's established disciplinary guidelines; however, all matters in mitigation or aggravation will be considered. A copy of the Board of Pharmacy's Disciplinary Guidelines will be provided to you on your written request to the state agency bringing this action.

If you are interested in pursuing this alternative to a formal administrative hearing, or if you have any questions, you or your attorney should contact Deputy Attorney General Geoffrey S. Allen at the earliest opportunity.

Dated: February 25, 2010

EDMUND G. BROWN JR.  
Attorney General of California  
ARTHUR D. TAGGART  
Supervising Deputy Attorney General



GEOFFREY S. ALLEN  
Deputy Attorney General

*Attorneys for Complainant*

SA2009101835  
10540440.doc

1 EDMUND G. BROWN JR.  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 GEOFFREY S. ALLEN, State Bar No. 193338  
Deputy Attorney General  
4 1300 I Street, Suite 125  
P.O. Box 944255  
5 Sacramento, CA 94244-2550  
Telephone: (916) 324-5341  
6 Facsimile: (916) 327-8643

7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:  
13 **CHASIDY T. R. WOOD**  
14 **CHASSIDY T. ROMETTI WOOD A.K.A.**  
15 **CHASIDY TERRIE ROMETTI WOOD**  
16 **A.K.A.**  
17 **CHASIDY WOOD A.K.A.**  
18 **CHASSIDY WOOD A.K.A.**  
19 **CHASSIDY T. WOOD A.K.A.**  
20 **CHASIDY T. ROMETTI A.K.A.**  
21 **CHASSIDY T. ROMETTI A.K.A.**  
22 **CHASIDYTERRIE WOOD A.K.A.**  
23 **CHASSIDY TERRIE WOOD**  
24 3785 Henshaw Rd.  
25 West Sacramento, CA 95691  
26 **Pharmacy Technician Registration No. TCH**  
27 **45272**  
28 Respondent.

Case No. 3422

**REQUEST FOR DISCOVERY**

TO RESPONDENT:

Under section 11507.6 of the Government Code of the State of California, parties to an administrative hearing, including the Complainant, are entitled to certain information concerning the opposing party's case. A copy of the provisions of section 11507.6 of the Government Code concerning such rights is included among the papers served.



1 PURSUANT TO SECTION 11507.6 OF THE GOVERNMENT CODE, YOU ARE  
2 HEREBY REQUESTED TO:

3 1. Provide the names and addresses of witnesses to the extent known to the Respondent,  
4 including, but not limited to, those intended to be called to testify at the hearing, and

5 2. Provide an opportunity for the Complainant to inspect and make a copy of any of the  
6 following in the possession or custody or under control of the Respondent:

7 a. A statement of a person, other than the Respondent, named in the initial  
8 administrative pleading, or in any additional pleading, when it is claimed that the act or  
9 omission of the Respondent as to this person is the basis for the administrative proceeding;

10 b. A statement pertaining to the subject matter of the proceeding made by  
11 any party to another party or persons;

12 c. Statements of witnesses then proposed to be called by the Respondent and  
13 of other persons having personal knowledge of the acts, omissions or events which are the  
14 basis for the proceeding, not included in (a) or (b) above;

15 d. All writings, including but not limited to reports of mental, physical and  
16 blood examinations and things which the Respondent now proposes to offer in evidence;

17 e. Any other writing or thing which is relevant and which would be  
18 admissible in evidence, including but not limited to, any patient or hospital records  
19 pertaining to the persons named in the pleading;

20 f. Investigative reports made by or on behalf of the Respondent pertaining  
21 to the subject matter of the proceeding, to the extent that these reports (1) contain the names  
22 and addresses of witnesses or of persons having personal knowledge of the acts, omissions  
23 or events which are the basis for the proceeding, or (2) reflect matters perceived by the  
24 investigator in the course of his or her investigation, or (3) contain or include by attachment  
25 any statement or writing described in (a) to (e), inclusive, or summary thereof.

26 For the purpose of this Request for Discovery, "statements" include written statements by  
27 the person, signed, or otherwise authenticated by him or her, stenographic, mechanical, electrical  
28

1 or other recordings, or transcripts thereof, of oral statements by the person, and written reports or  
2 summaries of these oral statements.

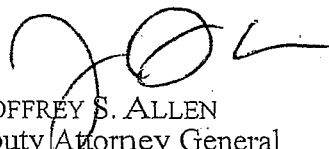
3 YOU ARE HEREBY FURTHER NOTIFIED that nothing in this Request for Discovery  
4 should be deemed to authorize the inspection or copying of any writing or thing which is  
5 privileged from disclosure by law or otherwise made confidential or protected as attorney's work  
6 product.

7 Your response to this Request for Discovery should be directed to the undersigned attorney  
8 for the Complainant at the address on the first page of this Request for Discovery within 30 days  
9 after service of the Accusation.

10 Failure without substantial justification to comply with this Request for Discovery may  
11 subject the Respondent to sanctions pursuant to sections 11507.7 and 11455.10 to 11455.30 of the  
12 Government Code.

13 Dated: February 25, 2010

14 EDMUND G. BROWN JR.  
15 Attorney General of California  
16 ARTHUR D. TAGGART  
17 Supervising Deputy Attorney General

18   
19 GEOFFREY S. ALLEN  
20 Deputy Attorney General

21 *Attorneys for Complainant*

22  
23  
24  
25  
26  
27 SA2009101835  
28 10540440.doc

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

In the Matter of the Accusation Against:

Case No. 3422

**CHASIDY T. R. WOOD  
CHASSIDY T. ROMETTI WOOD A.K.A.  
CHASIDY TERRIE ROMETTI WOOD  
A.K.A.  
CHASIDY WOOD A.K.A.  
CHASSIDY WOOD A.K.A.  
CHASSIDY T. WOOD A.K.A.  
CHASIDY T. ROMETTI A.K.A.  
CHASSIDY T. ROMETTI A.K.A.  
CHASIDY TERRIE WOOD A.K.A.  
CHASSIDY TERRIE WOOD  
3785 Henshaw Rd.  
West Sacramento, CA 95691**

**NOTICE OF DEFENSE**

[Gov. Code §§ 11505 and 11506]

**Pharmacy Technician Registration No. TCH  
45272**

Respondent.

I, the undersigned Respondent in the above-entitled proceeding, hereby acknowledge receipt of a copy of the Accusation; Statement to Respondent; Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery; and two copies of a Notice of Defense.

I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation.

Dated: \_\_\_\_\_

Respondent's Name: \_\_\_\_\_

Respondent's Signature: \_\_\_\_\_

Respondent's Mailing \_\_\_\_\_

Address: \_\_\_\_\_

City, State and Zip Code: \_\_\_\_\_

Respondent's Telephone: \_\_\_\_\_

**Check appropriate box:**

I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you

may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name \_\_\_\_\_

Counsel's Mailing Address \_\_\_\_\_

City, State and Zip Code \_\_\_\_\_

Counsel's Telephone Number \_\_\_\_\_

- I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

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

In the Matter of the Accusation Against:

Case No. 3422

**CHASIDY T. R. WOOD  
CHASSIDY T. ROMETTI WOOD A.K.A.  
CHASIDY TERRIE ROMETTI WOOD  
A.K.A.  
CHASIDY WOOD A.K.A.  
CHASSIDY WOOD A.K.A.  
CHASSIDY T. WOOD A.K.A.  
CHASIDY T. ROMETTI A.K.A.  
CHASSIDY T. ROMETTI A.K.A.  
CHASIDY TERRIE WOOD A.K.A.  
CHASSIDY TERRIE WOOD  
3785 Henshaw Rd.  
West Sacramento, CA 95691**

**NOTICE OF DEFENSE**

[Gov. Code §§ 11505 and 11506]

**Pharmacy Technician Registration No. TCH  
45272**

Respondent.

I, the undersigned Respondent in the above-entitled proceeding, hereby acknowledge receipt of a copy of the Accusation; Statement to Respondent; Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery; and two copies of a Notice of Defense.

I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation.

Dated: \_\_\_\_\_

Respondent's Name: \_\_\_\_\_

Respondent's Signature: \_\_\_\_\_

Respondent's Mailing \_\_\_\_\_

Address: \_\_\_\_\_

City, State and Zip Code: \_\_\_\_\_

Respondent's Telephone: \_\_\_\_\_

**Check appropriate box:**

I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you

may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name \_\_\_\_\_

Counsel's Mailing Address \_\_\_\_\_

City, State and Zip Code \_\_\_\_\_

Counsel's Telephone Number \_\_\_\_\_

- I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

**COPY OF GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7  
PROVIDED PURSUANT TO GOVERNMENT CODE SECTIONS 11504 AND 11505**

**SECTION 11507.5: Exclusivity of discovery provisions**

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

**SECTION 11507.6: Request for discovery**

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

**SECTION 11507.7: Petition to compel discovery; Order; Sanctions**

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of Section 915 of the Evidence Code and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

\*\*\*\*\*