

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

In the Matter of the Accusation Against:

Case No. 4233

NATALIE GOLDSWORTHY
5786 Woodland Court
Discovery Bay, CA 94505

Pharmacy Technician License No. TCH 72332

Respondent.

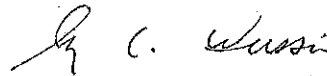
DECISION AND ORDER

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 October 25, 2013.

It is so ORDERED on September 25, 2013.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA



By

STAN C. WEISSER
Board President

1 KAMALA D. HARRIS
Attorney General of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
3 JOSHUA A. ROOM
Supervising Deputy Attorney General
4 State Bar No. 214663
455 Golden Gate Avenue, Suite 11000
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Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

Case No. 4233

12 **NATALIE JEANNE GOLDSWORTHY**
13 **5786 Woodland Court**
14 **Discovery Bay, CA 94505**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

Pharmacy Technician License No. TCH 72332

Respondent.

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

19 PARTIES

20 1. Virginia Herold (Complainant), Executive Officer, Board of Pharmacy, brought this
21 action solely in her official capacity and is represented herein by Kamala D. Harris, Attorney
22 General of the State of California, by Joshua A. Room, Supervising Deputy Attorney General.

23 2. Natalie Jeanne Goldsworthy (Respondent) is representing herself in this proceeding
24 and has chosen not to exercise her right to be represented by counsel.

25 3. On or about October 3, 2006, the Board of Pharmacy issued Pharmacy Technician
26 License No. TCH 72332 to Natalie Jeanne Goldsworthy (Respondent). The License was in full
27 force and effect at all times relevant to the charges brought in Accusation No. 4233 and will
28 expire on April 30, 2014, unless renewed.

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

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

7 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
8 issued, her wall certificate on or before the effective date of the Decision and Order.

9 4. Respondent may not apply, reapply, or petition for any licensure or registration of the
10 Board for three (3) years from the effective date of the Decision and Order.

11 5. If she ever applies for licensure or petitions for reinstatement in the State of
12 California, the Board shall treat it as a new application for licensure. Respondent must comply
13 with all the laws, regulations and procedures for licensure in effect at the time the application or
14 petition is filed, including, but not limited to, certification by a nationally recognized body prior
15 to the issuance of a new license. All of the charges and allegations contained in Accusation No.
16 4233 shall be deemed to be true, correct and admitted by Respondent when the Board determines
17 whether to grant or deny the application or petition.

18 6. Respondent shall pay the Board its costs of investigation and enforcement in the
19 amount of \$6,499.50 prior to issuance of a new or reinstated license.

20 7. If Respondent should ever apply or reapply for a new license or certification, or
21 petition for reinstatement of a license, by any other health care licensing agency in the State of
22 California, all of the charges and allegations contained in Accusation, No. 4233 shall be deemed
23 to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any
24 other proceeding seeking to deny or restrict licensure.

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ACCEPTANCE

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

DATED: 8/13/2013 ~~10/10~~ *Natalie Goldsworthy*
NATALIE JEANNE GOLDSWORTHY
Respondent

ENDORSEMENT

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

Dated: 8/22/2013

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
FRANK H. PACOE
Supervising Deputy Attorney General

Joshua A. Room
JOSHUA A. ROOM
Supervising Deputy Attorney General
Attorneys for Complainant

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Exhibit A

First Amended Accusation No. 4233

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2 FRANK H. PACOE
Supervising Deputy Attorney General
3 JOSHUA A. ROOM
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8 **BEFORE THE**
BOARD OF PHARMACY
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 4233

11 **NATALIE JEANNE GOLDSWORTHY**
12 **5786 Woodland Court**
13 **Discovery Bay, CA 94505**

FIRST AMENDED ACCUSATION

14 **Pharmacy Technician License No. TCH 72332**

15 Respondent.

16
17 Complainant alleges:

18 PARTIES

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

22 2. On or about October 3, 2006, the Board of Pharmacy issued Pharmacy Technician
23 License No. TCH 72332 to Natalie Jeanne Goldsworthy (Respondent). The License was in full
24 force and effect at all times relevant herein and will expire on April 30, 2014, unless renewed.

25 JURISDICTION

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

1 8. Section 4059 of the Code, in pertinent part, prohibits furnishing of any dangerous
2 drug or dangerous device except upon the prescription of an authorized prescriber.

3 9. Section 4060 of the Code provides, in pertinent part, that no person shall possess any
4 controlled substance, except that furnished upon a valid prescription/drug order.

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

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

11 12. Health and Safety Code section 11350, in pertinent part, makes it unlawful to possess
12 any controlled substance listed in Schedule II (Health and Safety Code section 11055),
13 subdivision (b) or (c), or any narcotic drug in Schedules III-V, absent a valid prescription.

14 13. Health and Safety Code section 11357, in pertinent part, makes it unlawful for any
15 person to possess **marijuana** or concentrated cannabis.

16 12. Health and Safety Code section 11550, in pertinent part, makes it unlawful for any
17 person to use or be under the influence of any controlled substance in Schedule II (Health and
18 Safety Code section 11055), subdivision (d)(1) or (d)(2), or any narcotic drug in Schedules III-V,
19 except when administered by or under the direction of an authorized licensee.

20 COST RECOVERY

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

24 CONTROLLED SUBSTANCES / DANGEROUS DRUGS

25 15. Section 4021 of the Code states:

26 “‘Controlled substance’ means any substance listed in Chapter 2 (commencing with Section
27 11053) of Division 10 of the Health and Safety Code.”

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

1 “‘Dangerous drug’ or ‘dangerous device’ means any drug or device unsafe for self use,
2 except veterinary drugs that are labeled as such, and includes the following:

3 “(a) Any drug that bears the legend: ‘Caution: federal law prohibits dispensing without
4 prescription,’ ‘Rx only,’ or words of similar import.

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

7 17. **Marijuana** is a Schedule I controlled substance as designated by Health and Safety
8 Code section 11054(d)(13), and a dangerous drug as designated by Business and Professions
9 Code section 4022. It is a hallucinogenic drug.

10 18. **Norco, Vicodin, Vicodin ES, Lortab, and Lorcet** are among the brand names for
11 compounds of varying dosages of acetaminophen (aka APAP) and **Hydrocodone**, a Schedule III
12 controlled substance as designated by Health and Safety Code section 11056(e)(4) and dangerous
13 drug as designated by Business and Professions Code section 4022. The varying compounds are
14 also known generically as **Hydrocodone with APAP**. These are all narcotic drugs.

15 FACTUAL BACKGROUND

16 19. On or about October 7, 2010, officer(s) from the Brentwood (CA) Police Department
17 responded to a report of two persons smoking **marijuana** in a Brentwood park. Upon arrival, the
18 officer(s) contacted Respondent, who admitted that she had been smoking **marijuana**, that she
19 did not possess a medical cannabis card, and that she had “a lot” of **marijuana** in her possession.

20 20. On that date, in Respondent’s purse, the officer(s) found a clear, glass jar containing
21 approximately 31.7 grams of **marijuana**, and also two (2) small plastic pill bottles, each
22 containing several pills of what was subsequently determined to be generic **Norco (Hydrocodone**
23 **with APAP)**. Under questioning by the officer(s), Respondent admitted that she got the
24 **marijuana** from a friend, that she smokes **marijuana** recreationally and to help with the pain
25 caused by her braces, that she got the generic **Norco** from a friend, paying \$2.00 per pill, and that
26 she also takes the **Norco** to help with her pain. She admitted to buying approximately fifty (50)
27 pills of **Norco** every two weeks. Lastly, she eventually admitted to being addicted to **Norco**.

28 ///

1 21. From an unknown start date in or about January 2012 until on or about October 11,
2 2012, Respondent worked as a pharmacy technician at a Safeway Pharmacy (PHY 36832) in
3 Antioch, CA, where by virtue of her employment she had access to controlled substances and
4 dangerous drugs. During her employment, Respondent used her access to divert/steal controlled
5 substances / dangerous drugs, including **Norco** or other **hydrocodone**-containing drugs.

6 22. The exact number of instances of diversion/theft by Respondent, and the full quantity
7 of controlled substances or dangerous drugs diverted/stolen, are not known, but in the course of
8 investigations by Safeway and by the Board, the following was discovered:

9 a. In or about August 2012, additional hidden surveillance cameras were installed
10 in the pharmacy where Respondent worked, due to concerns over possible losses of narcotics.

11 b. On or about October 7, 2012, loss prevention discovered video evidence that
12 Respondent was diverting/stealing narcotic controlled substances from the pharmacy stock.

13 c. On or about October 10, 2012, Respondent was interviewed by loss prevention
14 staff and/or managers for Safeway. She confessed to her past history of self-use of **Norco** or its
15 generic equivalent(s) in 2010, as described in paragraph 19 above. She further admitted that she
16 continued consuming **Norco** even after completing a court-ordered drug diversion program, and
17 that she began stealing generic **Norco (Hydrocodone with APAP) 10/325** from the Safeway
18 Pharmacy upon starting employment in or about January 2012. She admitted to stealing one
19 hundred (100) tablets of generic **Norco (Hydrocodone with APAP) 10/325** from the Antioch
20 store, and that she self-administered the drugs. She tendered her resignation from employment.

21 d. On or about October 17, 2012, Safeway submitted a Report of Theft or Loss of
22 Controlled Substances (Form DEA-106) to the Drug Enforcement Administration (DEA) and to
23 the Board, in which Safeway reported the following losses to employee pilferage: 2,507 tablets
24 of **Hydrocodone with APAP 10/325** (generic **Norco**), and 238 tablets of **Norco 10/325**.

1 FIRST CAUSE FOR DISCIPLINE

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

3 23. Respondent is subject to discipline under section 4301(f) of the Code, in that
4 Respondent, as described in paragraphs 19 to 22 above, committed acts involving moral
5 turpitude, dishonesty, fraud, deceit, or corruption.
6

7 SECOND CAUSE FOR DISCIPLINE

8 (Self-Administration/Use of Controlled Substance)

9 24. Respondent is subject to discipline under section 4301(h) of the Code, and/or 4301(j)
10 and/or (o) of the Code and Health and Safety Code section(s) 11170 and/or 11550, in that
11 Respondent, as described in paragraphs 19 to 22 above, self-administered/used, conspired to self-
12 administer/use, and/or assisted in or abetted self-administration use of, a controlled substance.
13

14 THIRD CAUSE FOR DISCIPLINE

15 (Furnishing of Controlled Substance(s))

16 25. Respondent is subject to discipline under section 4301(j) and/or (o) and/or section
17 4059 of the Code, and/or Health and Safety Code section 11170, in that Respondent, as described
18 in paragraphs 19 to 22 above, furnished to herself or another, and/or conspired to furnish, and/or
19 assisted or abetted furnishing, a controlled substance/dangerous drug, without prescription.
20

21 FOURTH CAUSE FOR DISCIPLINE

22 (Possession of Controlled Substance(s))

23 26. Respondent is subject to discipline under section 4301(j) and/or (o) and/or section
24 4060 of the Code, and/or Health and Safety Code section(s) 11350 and/or 11357, in that
25 Respondent, as described in paragraphs 19 to 22 above, possessed, conspired to possess, and/or
26 assisted in or abetted possession of, one or more controlled substance(s), without a prescription.
27
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1 FIFTH CAUSE FOR DISCIPLINE

2 (Obtaining Controlled Substance by Fraud, Deceit or Subterfuge)

3 27. Respondent is subject to discipline under section 4301(j) and/or (o) of the Code,
4 and/or Health and Safety Code section 11173(a), in that Respondent, as described in paragraphs
5 19 to 22 above, obtained, conspired to obtain, and/or assisted in or abetted the obtaining of a
6 controlled substance, by fraud, deceit, subterfuge, or concealment of material fact.

7
8 SIXTH CAUSE FOR DISCIPLINE

9 (Unprofessional Conduct)

10 28. Respondent is subject to discipline under section 4301 of the Code in that
11 Respondent, as described in paragraphs 19 to 27 above, engaged in unprofessional conduct.

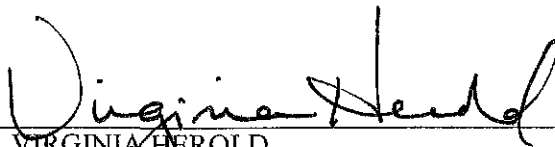
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13 PRAYER

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

- 16 1. Revoking or suspending Pharmacy Technician License No. TCH 72332, issued to
- 17 Natalie Jeanne Goldsworthy (Respondent);
- 18 2. Ordering Respondent to pay the Board the reasonable costs of the investigation and
- 19 enforcement of this case, pursuant to Business and Professions Code section 125.3;
- 20 3. Taking such other and further action as is deemed necessary and proper.

21
22 DATED: _____

2/27/13

23 

24 VIRGINIA HEROLD
25 Executive Officer
26 Board of Pharmacy
27 Department of Consumer Affairs
28 State of California
Complainant

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

10 In the Matter of the Accusation Against:
11 **NATALIE JEANNE GOLDSWORTHY**
12 **1441 Mallard Lane**
13 **Oakley, CA 94561**
14 **Pharmacy Technician License No. TCH 72332**
15 **Respondent.**

Case No. 4233

A C C U S A T I O N

16
17 Complainant alleges:

18 PARTIES

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

21 2. On or about October 3, 2006, the Board of Pharmacy issued Pharmacy Technician
22 License No. TCH 72332 to Natalie Jeanne Goldsworthy (Respondent). The License was in full
23 force and effect at all times relevant herein and will expire on April 30, 2014, unless renewed.

24 JURISDICTION

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

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

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

6. Section 118(b) of the Code provides, in pertinent part, that the suspension, expiration, surrender, or cancellation of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated. Section 4402(a) of the Code provides that any pharmacist license that is not renewed within three years following its expiration may not be renewed, restored, or reinstated and shall be canceled by operation of law at the end of the three-year period. Section 4402(e) of the Code provides that any other license issued by the Board may be canceled by the Board if not renewed within 60 days after its expiration, and will require a new application.

STATUTORY AND REGULATORY PROVISIONS

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

(h) The administering to oneself, of any controlled substance, or the use of any dangerous drug or of alcoholic beverages to the extent or in a manner as to be dangerous or injurious to oneself, to a person holding a license under this chapter, or to any other person or to the public, or to the extent that the use impairs the ability of the person to conduct with safety to the public the practice authorized by the license.

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

(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.

1 8. Section 4059 of the Code, in pertinent part, prohibits furnishing of any dangerous
2 drug or dangerous device except upon the prescription of an authorized prescriber.

3 9. Section 4060 of the Code provides, in pertinent part, that no person shall possess any
4 controlled substance, except that furnished upon a valid prescription/drug order.

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

7 11. Health and Safety Code section 11350, in pertinent part, makes it unlawful to possess
8 any controlled substance listed in Schedule II (Health and Safety Code section 11055),
9 subdivision (b) or (c), or any narcotic drug in Schedules III-V, absent a valid prescription.

10 12. Health and Safety Code section 11357, in pertinent part, makes it unlawful for any
11 person to possess **marijuana** or concentrated cannabis.

12 12. Health and Safety Code section 11550, in pertinent part, makes it unlawful for any
13 person to use or be under the influence of any controlled substance in Schedule II (Health and
14 Safety Code section 11055), subdivision (d)(1) or (d)(2), or any narcotic drug in Schedules III-V,
15 except when administered by or under the direction of an authorized licensee.

16 COST RECOVERY

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

20 CONTROLLED SUBSTANCES / DANGEROUS DRUGS

21 14. Section 4021 of the Code states:

22 “Controlled substance’ means any substance listed in Chapter 2 (commencing with Section
23 11053) of Division 10 of the Health and Safety Code.”

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

25 “Dangerous drug’ or ‘dangerous device’ means any drug or device unsafe for self use,
26 except veterinary drugs that are labeled as such, and includes the following:

27 “(a) Any drug that bears the legend: ‘Caution: federal law prohibits dispensing without
28 prescription,’ ‘Rx only,’ or words of similar import.

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“(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.”

16. **Marijuana** is a Schedule I controlled substance as designated by Health and Safety Code section 11054(d)(13), and a dangerous drug as designated by Business and Professions Code section 4022. It is a hallucinogenic drug.

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

FACTUAL BACKGROUND

18. On or about October 7, 2010, officer(s) from the Brentwood (CA) Police Department responded to a report of two persons smoking **marijuana** in a Brentwood park. Upon arrival, the officer(s) contacted Respondent, who admitted that she had been smoking **marijuana**, that she did not possess a medical cannabis card, and that she had “a lot” of **marijuana** in her possession.

19. In Respondent’s purse, the officer(s) found a clear, glass jar containing approximately 31.7 grams of **marijuana**, and also two (2) small plastic pill bottles, each containing several pills of what was subsequently determined to be generic **Norco (Hydrocodone with APAP)**. Under questioning by the officer(s), Respondent admitted that she got the **marijuana** from a friend, that she smokes **marijuana** recreationally and to help with the pain caused by her braces, that she got the generic **Norco** from a friend, paying \$2.00 per pill, and that she also takes the **Norco** to help with her pain. She admitted to buying approximately fifty (50) pills of **Norco** every two weeks. Lastly, she eventually admitted to being addicted to **Norco**.

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1 FIRST CAUSE FOR DISCIPLINE

2 (Self-Administration of Controlled Substance(s))

3 20. Respondent is subject to discipline under section 4301(h) of the Code, and/or 4301(j)
4 and/or (o) of the Code and Health and Safety Code section 11170, in that Respondent, as
5 described in paragraphs 18 and 19 above, administered a controlled substance to herself.

6 SECOND CAUSE FOR DISCIPLINE

7 (Furnishing of Controlled Substance(s))

8 21. Respondent is subject to discipline under section 4301(j) and/or (o) and/or section
9 4059 of the Code, and/or Health and Safety Code section 11170, in that Respondent, as described
10 in paragraphs 18 and 19 above, furnished to herself or another without a valid prescription, and/or
11 conspired to furnish, and/or assisted or abetted furnishing of, a controlled substance.

12 THIRD CAUSE FOR DISCIPLINE

13 (Possession of Controlled Substance(s))

14 22. Respondent is subject to discipline under section 4301(j) and/or (o) and/or section
15 4060 of the Code, and/or Health and Safety Code section(s) 11350 and/or 11357, in that
16 Respondent, as described in paragraphs 18 and 19 above, possessed, conspired to possess, and/or
17 assisted in or abetted possession of, a controlled substance, without a prescription.

18 FOURTH CAUSE FOR DISCIPLINE

19 (Possession of Controlled Substance(s))

20 23. Respondent is subject to discipline under section 4301(j) and/or (o) of the Code,
21 and/or Health and Safety Code section 11550, in that Respondent, as described in paragraphs 18
22 and 19 above, used and/or was under the influence of, conspired to use/be under the influence of,
23 and/or assisted in or abetted use/being under the influence of, a controlled substance,.

24 FIFTH CAUSE FOR DISCIPLINE

25 (Unprofessional Conduct)

26 24. Respondent is subject to discipline under section 4301 of the Code in that
27 Respondent, as described in paragraphs 18 to 23 above, engaged in unprofessional conduct.

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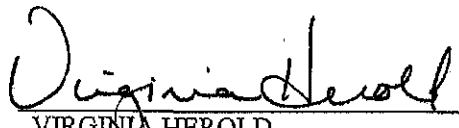
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PRAYER

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

1. Revoking or suspending Pharmacy Technician License No. TCH 72332, issued to Natalie Jeanne Goldsworthy (Respondent);
2. Ordering Respondent to pay the Board 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 is deemed necessary and proper.

DATED: 7/19/12



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

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