

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

In the Matter of the Statement of Issues
Against:

REBECCA JO SPEER,

Respondent.

Case No. 4309

OAH No. 2015070645

DECISION AND ORDER

The attached Proposed Decision of the Administrative Law Judge is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on December 4, 2015.

It is so ORDERED on November 4, 2015.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA



By

Amy Gutierrez, Pharm.D.
Board President

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PROPOSED DECISION

Kimberly J. Belvedere, Administrative Law Judge, Office of Administrative Hearings, State of California, heard this matter on August 31,, 2015, in Los Angeles, California.

Sydney Mehringer, Deputy Attorney General, Office of the Attorney General, represented complainant, Virginia Herold, M.Ed., R.N., Executive Officer, Board of Pharmacy, Department of Consumer Affairs, State of California.

Respondent represented herself.

The matter was submitted on August 31, 2015.

FACTUAL FINDINGS

Background

1. On May 18, 2011, respondent filed an application with the board for registration as a pharmacy technician.
2. The board denied her application on February 14, 2012.
3. On May 28, 2015, complainant signed the Statement of Issues in Case No. 4309, requesting denial of respondent's application on the grounds that she committed unprofessional conduct on March 31, 2011, when she possessed marijuana in violation of California and federal law.

The March 31, 2011, Incident

4. Respondent was arrested by Deputy Kochaon of the Los Angeles County Sheriff's Department on March 31, 2011. A police report concerning the arrest was admitted pursuant to *Lake v. Reed* (1997) 16 Cal.4th 448.¹

According to the report, Deputy Kochaon observed respondent's vehicle in the parking lot of a motel. Respondent and another female were standing next to respondent's vehicle. Deputy Kochaon drove up to respondent and her friend and rolled down the patrol car window. He asked them what they were doing at the location. Respondent told Deputy Kochaon that she was there with her friends to rent a room. Deputy Kochaon stated that he smelled a "strong odor" of marijuana from respondent's purse as she stood next to the patrol vehicle. The report did not indicate if the purse was open or closed; what kind of purse it was; where respondent was standing in relation to the patrol vehicle; or what Deputy Kochaon's experience was with respect to controlled substances such as marijuana.

Based on that observation, he searched respondent's purse. Deputy Kochaon's report indicated that he found a sandwich baggie of marijuana in respondent's purse, along with a "digital scale." A male approached Deputy Kochaon and told him to leave the females alone. Deputy Kochaon asked the male if he had anything illegal on him, and the male stated that he had ecstasy. Deputy Kochaon located six ecstasy pills on the male.

Deputy Kochaon searched respondent's vehicle. He located a large sum of money in small denominations behind the driver's seat. The report did not state who was sitting in the rear of the vehicle; who had been most recently driving the vehicle; if the money was located loose or contained in another bag; or if he questioned respondent or any of the other two individuals about who the money belonged to. The report also did not state how Deputy Kochaon attributed the money to respondent other than the fact that the vehicle was registered to her.

¹ *Lake v. Reed* considered the admissibility of police reports in administrative proceedings under Government Code section 11513. In *Lake*, the California Supreme Court concluded that an officer's direct observations memorialized in his or her report were admissible under Evidence Code section 1280, the public employee records exception to the hearsay rule, and were sufficient to support a factual finding. The court concluded that admissions by a party memorialized in the report were admissible under Evidence Code section 1220 and were sufficient to support a factual finding. Citing Government Code section 11513, the court further concluded that other hearsay statements set forth in a police officer's report could be used to supplement or explain other evidence, but were not sufficient, by themselves, to support a factual finding unless – as with the public employees records exception to the hearsay rule and the party admission exception to the hearsay rule – the hearsay evidence would be admissible over objection in civil actions.

Based on the forgoing, Deputy Kochoon arrested respondent for sales of marijuana, a felony. He also arrested the male for possession of ecstasy.

5. Respondent testified about the incident. She was very emotional and cried throughout some of her testimony. Her testimony about the incident demonstrated that it had been a very traumatic experience for her. Respondent's testimony was credible and sincere.

According to respondent, she was at the house of her female friend when her friend's boyfriend, Lee Carr, arrived and stated that he needed a ride. Respondent transported the female and male to the motel. Respondent stated that her car was "full" of Mr. Carr's belongings. She parked by the side of the motel and waited for him to complete his check-in, when Deputy Kochoon pulled up. Respondent had a medical marijuana card at the time, so she did not dispute that her purse may have smelled like marijuana. However, she stated that her purse was not on her person at the time Deputy Kochoon contacted her. Given that she had a medical marijuana card and nothing to hide, she allowed Deputy Kochoon to search her car.

According to respondent, deputy Kochoon located her purse in the car but her purse did not contain any marijuana. Respondent stated that the marijuana was located in the trunk of her car, which is where she put it after she left the dispensary. Respondent offered to show the deputy her medical marijuana card and identification, but before she knew it, she was arrested.

Respondent said that she did not have a digital scale anywhere on her person or in the vehicle. Respondent stated that the roll of money was located in Mr. Carr's bag, which was located behind the driver's seat where he had been sitting just prior to dropping him off at the motel. Respondent also testified that the digital scale was located in Mr. Carr's pocket at the time the deputy found the ecstasy.

Respondent was charged with possession of marijuana, not sales, and the judge agreed to dismiss everything if she went to ten narcotics anonymous classes. She completed the ten classes, and the case was dismissed.²

Respondent's Evidence

6. Respondent was 19-years-old at the time of this event. She is now 23-years-old. Respondent denied selling marijuana, but did admit to possessing 26.5 grams of marijuana on March 31, 2011.

7. Respondent damaged a muscle in her forehead area when she was two years old. As such, she has suffered with migraine headaches most of her life. Although she

² Court records corroborated respondent's testimony regarding the completion of her attendance of the ten classes and dismissal of her case pursuant to Penal Code 1385, in the furtherance of justice. Respondent was not convicted of any crime.

commonly took Ibuprofen to control the pain, she obtained a medical marijuana card when she turned 18. The card allowed respondent to purchase marijuana legally for her medical condition. She had the 26.5 grams of marijuana in her vehicle trunk on March 31, 2011, because she had come from a dispensary and had not yet removed it.

8. Respondent no longer uses marijuana. She still gets migraine headaches, but only takes Ibuprofen.

9. Respondent learned from her experience on March 31, 2011. First, she learned that her two friends just saw her as a "ride" and had a negative impact on her life. When she attended the ten Narcotics Anonymous meetings ordered by the court, she came into contact with individuals who told horrible stories regarding their drug use. She decided she did not want to end up like them. In her observations, marijuana was the "gateway" drug that led to their drug habits. So, she let her medical marijuana card expire.

10. When she was 16 to 19 years old, respondent worked at fast food restaurants or other retail establishments while she went to school. She currently works at a restaurant, where she has worked for the last three years.

Respondent submitted a letter from her manager, Dana Secor. Mr. Secor described respondent as a generous person who always thinks of others. He described her as pleasant; enthusiastic; and a person who has high integrity.

11. Respondent attended Everest College from 2010 to 2011 and obtained the necessary education to become a pharmacy technician.

12. No evidence was presented to show that respondent has been arrested since 2011, or that she has otherwise had any contact with law enforcement.

13. Respondent submitted a letter of support from her sister, Kendra Smith. Ms. Smith wrote that, after the March 31, 2011, incident, respondent moved into her home because she wanted to start over, make new friends, and begin a new life. Ms. Smith wrote that, over the past few years, respondent has made better choices for her future and her prospects are very bright.

14. It is very important to respondent that she become a licensed pharmacy technician. Her mother was a licensed vocational nurse, so she grew up around people who worked in the medical field. She would like to work in a compounding pharmacy because she is good at math, enjoys the profession, and can apply her skills in that capacity.

LEGAL CONCLUSIONS

Applicable Law

1. In a proceeding involving an application for licensure as a pharmacy technician, the burden of proof is on the respondent to show by a preponderance of the evidence that she is qualified to be licensed. (Evid. Code, §§ 115, 500.)

2. The board is authorized to deny an application for pharmacy technician if the applicant has engaged in unprofessional conduct. (Bus. & Prof. Code, § 4300, subd. (c).) Unprofessional conduct includes, but is not limited to, “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.” (Bus. & Prof. Code, § 4301, subd. (j).)

3. It is not necessary for the misconduct to have occurred in the actual practice of the profession. (*Harrington v. Department of Real Estate* (1989) 214 Cal.App.3d 394, 402.)

4. The board may only deny a license if the conduct at issue is substantially related to the qualifications, functions or duties of a pharmacy technician. (Cal. Code Regs., tit. 16, § 1770.) An act is substantially related to the qualifications, functions, or duties of the pharmacy technician if, to a substantial degree, it evidences present or potential unfitness to perform the functions of a pharmacy technician in a manner consistent with the public health, safety, or welfare. (*Ibid.*)

California’s Marijuana Laws

5. A person who is in possession of any amount of marijuana for sale is guilty of a felony. (Health & Saf. Code, section 11359.) A person who is in possession of less than 28.5 grams of marijuana is guilty of an infraction. (Health & Saf. Code, section 11357, subd. (b).)

6. In 1996, California passed the Compassionate Use Act of 1996 (CUA). (Health & Saf. Code, § 11362.5.) The purpose of the CUA was to ensure that persons who obtained and uses marijuana for medical purposes upon the recommendation of a physician would not be subject to criminal prosecution “or sanction.” (*id.* at subd. (b)(1).) In 2003, the state enacted the Medical Marijuana Program Act (MMPA) to implement the mandates of the CUA. (Health & Saf. Code, § 11362.7 et seq.; *People v. London* (2014) 228 Cal.App.4th 544, 552.) The MMPA does not place a limit on the amount of marijuana a person may possess for medical purposes; a patient may possess any amount that is “reasonably related” to the person’s current medical needs. (*People v. Frazier* (2005) 128 Cal.App.4th 807, 824.) Cities and counties may also enact their own guidelines relating to authorized quantities within their territorial jurisdiction. (Health & Saf. Code, § 11362.77.)

Federal Marijuana Laws

7. Under federal law, marijuana is classified as a Schedule I controlled substance because it has a high potential for abuse. (21 U.S.C. § 812.)

8. It is illegal under federal law to distribute or possess with the intent to distribute any amount of a controlled substance for sale. (21 U.S.C. § 841(a)(1).)

9. It is illegal under federal law to knowingly possess a controlled substance “unless such substance was obtained directly, or pursuant to a valid prescription or order, from a practitioner, while acting in the course of his professional practice . . .” (21 U.S.C. § 844(a).)

Respondent Did Not Violate State or Federal Marijuana Laws on March 31, 2011

10. Respondent did not dispute that she possessed 26.5 grams of marijuana on March 31, 2011. However, the evidence did not establish that she possessed marijuana for sale or possessed marijuana in violation of state or federal law such that grounds exist to deny her application.³

RESPONDENT DID NOT POSSESS MARIJUANA FOR SALE

11. According to Deputy Kochaon’s report, he concluded that respondent was selling marijuana because the amount of marijuana respondent had in her possession was more than just for personal use; the digital scale found in her purse was commonly used by drug dealers; respondent was not under the influence of marijuana at the time of her arrest; the money found in the rolled up rubber band was consistent with street sales of marijuana; and respondent told the deputy that she had been arrested in the past for the sale of marijuana.

Deputy Kochaon did not testify and his conclusions lacked foundation.⁴ No evidence was presented regarding his training and experience with narcotics; training and experience with street sales of marijuana; how he determined respondent was not under the influence of marijuana; or how he knew the digital scale recovered during the arrest was one commonly used by drug dealers. Moreover, respondent had just transported two other individuals in her

³ Official notice is taken that marijuana is a Schedule I controlled substance under state and federal law. (Health & Saf. Code, § 11054, subd. (d); 21 U.S.C. § 812.) It is also a dangerous drug under state law. (Health & Saf. Code, § 4022.)

⁴ Counsel for complainant subpoenaed Deputy Kochaon to testify at the hearing. Deputy Kochaon failed to appear. Counsel contacted Deputy Kochaon during a break in the proceedings. Although properly served, Deputy Kochaon informed the subpoena clerk that he would not be appearing and that he did not remember anything other than what was contained in his report.

vehicle, one of whom was also arrested for possession of six ecstasy pills, a controlled substance, and who was sitting in the rear of the vehicle where the large quantity of money was located. However, Deputy Kochaon's report does not specify why he eliminated the male passenger as a source of the money or why the amount of money was inconsistent with the sales of ecstasy. Instead, he attributed the money to respondent simply because the vehicle was registered to her.

Respondent testified credibly that she had a valid physician recommendation for medical marijuana at the time of her 2011 arrest. Consequently, respondent would have been permitted to be in possession of marijuana at the time of her arrest. Respondent also testified credibly that she had just purchased the marijuana in "bulk" from a dispensary and that she was always careful to adhere to the regulations relating to quantity. No evidence was provided regarding whether the amount of marijuana that respondent had in her vehicle was consistent with sales of marijuana, inconsistent with an amount reasonably related to her then-existing medical needs, or otherwise in violation of the MMPA.

Finally, respondent disputed that she had a digital scale in her purse or that the money was located in her vehicle, and Deputy Kochaon was not present to testify regarding the conflicting observations in his report. There were also no other observations in the report to demonstrate, to an objective observer, that respondent was selling marijuana (i.e. single use plastic baggies, cutting materials, client lists, etc.) Therefore, while respondent clearly possessed marijuana, there was insufficient evidence to establish that respondent was in possession of marijuana for sale or that she violated either Health and Safety Code section 11359 or Title 21 of the United States Code section 841, subdivision (a)(1).

RESPONDENT'S POSSESSION OF MARIJUANA IS NOT GROUNDS FOR DENIAL OF HER APPLICATION

12. Under California law, possession of 26.5 grams of marijuana is an infraction. However, if one possesses marijuana when recommended by a physician and obtained in accordance with the CUA and MMPA, it serves as a complete defense to criminal liability. (*People v. Dowl* (2013) 57 Cal.4th 1079, 1085-86, *reh'g denied* (Oct. 16, 2013).) One of the bases for respondent's alleged unprofessional conduct was a violation of state marijuana law, therefore, in consideration of the CUA and MMPA, respondent's possession of marijuana on March 31, 2011, cannot be used as a basis to deny her application for licensure.

13. Federal law nonetheless classifies marijuana as a Schedule I controlled substance and a person may not possess any controlled substance unless the substance is obtained pursuant to a valid prescription or order. Under federal law, marijuana, as a Schedule I controlled substance, cannot be prescribed. Therefore, respondent's possession of marijuana on March 31, 2011, violated federal law. (21 U.S.C. § 844(a).)

However, even though respondent's possession of marijuana violated federal law, it is not a basis to deny her application. The board's authority to deny a license for unprofessional conduct for a violation of state or federal law under Business and Professions

Code sections 4300, subdivision (c) and 4301, subdivision (j), is wholly a creature of state law. The state has no enforcement authority for a violation of federal law, rather, it can only reach federally proscribed conduct by incorporating it into the licensing provisions of state law. (*People v. Tilehkooh* (2003) 113 Cal.App.4th 1433, 1445.) Thus, although the violation of federal law is incorporated into Business and Professions Code section 4301, subdivision (j), as a basis to deny respondent's application for licensure, the incorporation of the federal law into the state licensing scheme does not otherwise abrogate any immunity or defense available to respondent under the CUA or MMPA. Complainant cannot do indirectly what it cannot do directly. (*id.* at 1446.) In other words, because the procedure for denying respondent's application is contained in *state* law, although the federal violation can serve as a basis to deny her application, the CUA defense under *state* law still applies. Accordingly, there is no basis to deny respondent's application based on a violation of federal law.


Cause Does Not Exist To Deny Respondent's Application

14. Cause does not exist to deny respondent's application for licensure as a pharmacy technician under Business and Professions Code, section 4300, subdivision (c), or 4301, subdivision (j).

ORDER

The application of Rebecca Jo Speer for a pharmacy technician's license is granted.

DATED: September 21, 2015


KIMBERLY J. BELVEDERE
Administrative Law Judge
Office of Administrative Hearings

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

10

11 In the Matter of the Statement of Issues
Against:

Case No. 4309

12 REBECCA JO SPEER

STATEMENT OF ISSUES

13 Pharmacy Technician Registration Applicant

14 Respondent.

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17 Complainant alleges:

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PARTIES

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

22 2. On or about May 18, 2011, the Board received an application for a Pharmacy
23 Technician Registration from Rebecca Jo Speer ("Respondent"). On or about May 12, 2011,
24 Rebecca Jo Speer certified under penalty of perjury to the truthfulness of all statements, answers,
25 and representations in the application. The Board denied the application on February 14, 2012.

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1 JURISDICTION

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

5 4. Code section 4300, subdivision (c), states, in pertinent part:

6 "The board may refuse a license to any applicant guilty of unprofessional conduct. The
7 board may, in its sole discretion, issue a probationary license to any applicant for a license who is
8 guilty of unprofessional conduct and who has met all other requirements for licensure. . . ."

9 5. Code section 4300.1 states, in pertinent part:

10 "The expiration, cancellation, forfeiture, or suspension of a board-issued license by
11 operation of law or by order or decision of the board or a court of law, the placement of a license
12 on a retired status, or the voluntary surrender of a license by a licensee shall not deprive the board
13 of jurisdiction to commence or proceed with any investigation of, or action or disciplinary
14 proceeding against, the licensee or to render a decision suspending or revoking the license."

15 STATUTORY PROVISIONS

16 6. Code section 480 states, in pertinent part:

17 "(a) A board may deny a license regulated by this code on the grounds that the applicant
18 has one of the following:

19
20 "(3) (A) Done any act that if done by a licentiate of the business or profession in question,
21 would be grounds for suspension or revocation of license.

22 "(B) The board may deny a license pursuant to this subdivision only if the crime or act is
23 substantially related to the qualifications, functions, or duties of the business or profession for
24 which application is made. . . ."

25 7. Code section 4301 states, in pertinent part:

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

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

DRUG STATUTES

8. Health and Safety Code section 11007 states:

"Controlled substance," unless otherwise specified, means a drug, substance, or immediate precursor which is listed in any schedule in Section 11054, 11055, 11056, 11057, or 11058."

9. Health and Safety Code section 11359 states:

"Every person who possesses for sale any marijuana, except as otherwise provided by law, shall be punished by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code."

10. United States Code, title 21, section 812 states, in pertinent part:

"(a) Establishment. There are established five schedules of controlled substances, to be known as schedules I, II, III, IV, and V. Such schedules shall initially consist of the substances listed in this section. . . .

"(b) Placement on schedules; findings required. Except where control is required by United States obligations under an international treaty, convention, or protocol, in effect on the effective date of this part, and except in the case of an immediate precursor, a drug or other substance may not be placed in any schedule unless the findings required for such schedule are made with respect to such drug or other substance. The findings required for each of the schedules are as follows:

"(1) SCHEDULE I.

"(A) The drug or other substance has a high potential for abuse.

"(B) The drug or other substance has no currently accepted medical use in treatment in the United States.

"(C) There is a lack of accepted safety for use of the drug or other substance under medical supervision."

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1 11. United States Code, title 21, section 841 states, in pertinent part:

2 "(a) Unlawful acts, Except as authorized by this title, it shall be unlawful for any person
3 knowingly or intentionally--

4 "(1) to manufacture, distribute, or dispense, or possess with intent to manufacture,
5 distribute, or dispense, a controlled substance; . . ."

6 12. United States Code, title 21, section 844 states, in pertinent part:

7 "(a) Unlawful acts; penalties, It shall be unlawful for any person knowingly or
8 intentionally to possess a controlled substance unless such substance was obtained directly, or
9 pursuant to a valid prescription . . ."

10 **REGULATORY PROVISION**

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

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

18 **CONTROLLED SUBSTANCE / DANGEROUS DRUG**

19 14. Marijuana is a hallucinogenic Schedule I controlled substance under State and federal
20 law (Health & Saf. Code § 11054 subd. (d)(13); and 21 U.S.C. § 812.) Marijuana is also a
21 dangerous drug as defined in Code section 4022.

22 **FIRST CAUSE FOR DENIAL OF APPLICATION**

23 **(Violating Laws Regulating Controlled Substances/Dangerous Drugs)**

24 15. Respondent's application is subject to denial under Code sections 4300, subdivision
25 (e) and 4301, subdivision (j), on the grounds of unprofessional conduct, in that on or about March
26 31, 2011, Respondent violated California and federal law regulating controlled substances and
27 dangerous drugs by violating Health and Safety Code section 11359, subdivision (a), and United
28 States Code, title 21, section 841, subdivision (a)(1) regulating the sale of marijuana and United

1 States Code, title 21, section 844, subdivision (a) regulating the possession of marijuana. The
2 circumstances are that on or about March 31, 2011, Respondent was in a public parking lot,
3 standing next to her vehicle, and was in possession of 26.5 grams of marijuana and a digital scale.

4 **SECOND CAUSE FOR DENIAL OF APPLICATION**

5 **(Acts Warranting Denial of License)**

6 16. Respondent's application is subject to denial under Code sections 480, subdivision
7 (a)(3)(A) and 4301 in that on or about March 31, 2011, Respondent committed an act which if
8 done by a licensed pharmacy technician would be grounds for suspension or revocation of her
9 license, as follows:

10 (a) Respondent committed an act that is substantially related to the qualifications,
11 functions, or duties of registered pharmacy technician which to a substantial degree evidences her
12 present or potential unfitness to perform the functions authorized by the license in a manner
13 consistent with the public, safety, or welfare in violation of Code section 4301 and California
14 Code of Regulations, title 16, section 1770 when she was in a public parking lot, standing next to
15 her vehicle, and was in possession of 26.5 grams of marijuana and a digital scale.

16 **PRAYER**

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

- 19 1. Denying the application of Rebecca Jo Speer for a Pharmacy Technician Registration;
20 and
21 2. Taking such other and further action as deemed necessary and proper.

22 DATED: 5/28/15

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

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