

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

In the Matter of the Accusation Against:

Case No. 4640

GARA L. GODBOLD
409 Lewis Lane
Pacifica, CA 94044

Pharmacy Technician Registration No.
TCH 61514

Respondent.

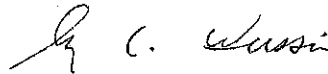
DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary 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 September 29, 2014.

It is so ORDERED on September 24, 2014.

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 DIANN SOKOLOFF
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Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

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13 **409 Lewis Lane**
14 **Pacifica, CA 94044**
15 **Pharmacy Technician**
Registration No. TCH 61514

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

16 Respondent.

17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
entitled proceedings that the following matters are true:

19 PARTIES

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

24 2. Gara L. Godbold (Respondent) is representing herself in this proceeding and has
25 chosen not to exercise her right to be represented by counsel.

26 3. On or about March 4, 2005, the Board of Pharmacy issued Pharmacy Technician
27 Registration No. TCH 61514 to Gara L. Godbold (Respondent). The Pharmacy Technician
28

1 Registration was in full force and effect at all times relevant to the charges brought in Accusation
2 No. 4640 and will expire on January 31, 2015, unless renewed.

3 JURISDICTION

4 4. Accusation No. 4640 was filed before the Board of Pharmacy (Board), Department of
5 Consumer Affairs, and is currently pending against Respondent. The Accusation and all other
6 statutorily required documents were properly served on Respondent on October 28, 2013.
7 Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation
8 No. 4640 is attached as Exhibit A and incorporated by reference.

9 ADVISEMENT AND WAIVERS

10 5. Respondent has carefully read, and understands the charges and allegations in
11 Accusation No. 4640. Respondent also has carefully read, and understands the effects of this
12 Stipulated Surrender of License and Order.

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

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

22 CULPABILITY

23 8. Respondent admits the truth of each and every charge and allegation in Accusation
24 No. 4640, agrees that cause exists for discipline, and hereby surrenders her Pharmacy Technician
25 Registration No. TCH 61514 for the Board's formal acceptance.

26 9. Respondent understands that by signing this stipulation she enables the Board to issue
27 an order accepting the surrender of her Pharmacy Technician Registration without further
28 process.

1 ORDER

2 IT IS HEREBY ORDERED that Pharmacy Technician Registration No. TCH 61514, issued
3 to Respondent Gara L. Godbold, is surrendered and accepted by the Board of Pharmacy.

4 1. The surrender of Respondent's Pharmacy Technician Registration and the acceptance
5 of the surrendered license by the Board shall constitute the imposition of discipline against
6 Respondent. This stipulation constitutes a record of the discipline and shall become a part of
7 Respondent's license history with the Board of Pharmacy.

8 2. Respondent shall lose all rights and privileges as a pharmacy technician in California
9 as of the effective date of the Board's Decision and Order.

10 3. Respondent shall cause to be delivered to the Board her license certificate on or
11 before the effective date of the Decision and Order.

12 4. Respondent may not apply for any license, permit, or registration from the Board for
13 three (3) years from the effective date of the Decision and Order. If Respondent ever applies for
14 licensure or petitions for reinstatement in the State of California, the Board shall treat it as a new
15 application for licensure. Respondent must comply with all the laws, regulations and procedures
16 for licensure in effect at the time the application or petition is filed, and all of the charges and
17 allegations contained in Accusation No. 4640 shall be deemed to be true, correct and admitted by
18 Respondent when the Board determines whether to grant or deny the application. Respondent
19 shall satisfy all requirements applicable to that license as of the date the application is submitted
20 to the Board, including, but not limited to certification by a nationally recognized body prior to
21 the issuance of a new license. Respondent is required to report this surrender as a disciplinary
22 action.

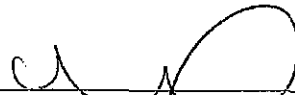
23 5. Respondent stipulates that should she apply for any license from the Board on or after
24 the effective date of the Decision and Order, that she shall pay the Board its costs of investigation
25 and enforcement in the amount of \$3,895 prior to the issuance of a new or reinstated license.

26 ACCEPTANCE

27 I have carefully read the Stipulated Surrender of License and Order. I understand the
28 stipulation and the effect it will have on my Pharmacy Technician Registration. I enter into this

1 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to
2 be bound by the Decision and Order of the Board of Pharmacy.

3
4 DATED: 8-1-14


GARA L. GODBOLD
Respondent

6
7 ENDORSEMENT

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

10 Dated: 8/21/2014

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
DIANN SOKOLOFF
Supervising Deputy Attorney General



ASPASIA A. PAPA VASSILIOU
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 4640

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Attorney General of California
2 DIANN SOKOLOFF
Supervising Deputy Attorney General
3 ASPASIA A. PAPAVALASSILOU
Deputy Attorney General
4 State Bar No. 196360.
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14 **Pacifica, CA 94044**
15 **Pharmacy Technician**
Registration No. TCH 61514

ACCUSATION

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

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

22 2. On or about March 4, 2005, the Board of Pharmacy issued Pharmacy Technician
23 Registration Number TCH 61514 to Gara L. Godbold (Respondent). The Pharmacy Technician
24 Registration was in full force and effect at all times relevant to the charges brought in this
25 Accusation and will expire on January 31, 2015, unless renewed.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board of Pharmacy (Board), Department of
28 Consumer Affairs, under the authority of the following laws. All section references are to the

1 Business and Professions Code unless otherwise indicated.

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

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

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

7 "(1) Suspending judgment.

8 "(2) Placing him or her upon probation.

9 "(3) Suspending his or her right to practice for a period not exceeding one year.

10 "(4) Revoking his or her license.

11 "(5) Taking any other action in relation to disciplining him or her as the board in its
12 discretion may deem proper."

13 5. Section 4300.1 of the Code states:

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

19 **STATUTORY PROVISIONS**

20 6. Section 4301 of the Code states, in part:

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

24 ...

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

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FIRST CAUSE FOR DISCIPLINE
(Unprofessional Conduct: Dishonesty, Fraud, or Deceit)
(Bus. & Prof. Code § 4301, subd. (f))

10. Respondent has subjected her pharmacy technician registration to discipline under Code section 4301, subdivision (f) (Unprofessional Conduct: Dishonesty, Fraud, or Deceit). The circumstances are set forth in paragraph 9, above.

SECOND CAUSE FOR DISCIPLINE
(Unprofessional Conduct: Dangerous Use of Dangerous Drug)
(Bus. & Prof. Code § 4301, subd. (h))

11. Respondent has subjected her pharmacy technician registration to discipline under Code section 4301, subdivision (h) (Dangerous Use of Dangerous Drug). The circumstances are set forth in paragraph 9, above.

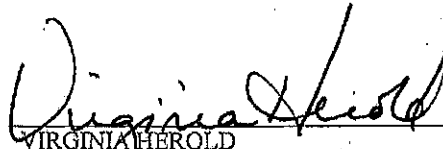
PRAYER

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

1. Revoking or suspending Pharmacy Technician Registration Number TCH 61514, issued to Gara L. Godbold;
2. Ordering Gara L. Godbold to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
3. Taking such other and further action as deemed necessary and proper.

DATED: _____

10/21/13



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

SF2013901522