

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

In the Matter of the Accusation Against:

Case No. 4816

**SHERRI LIN OXFORD**  
6139 W. Alameda Rd.  
Glendale, AZ 85310

Original Pharmacist License No. RPH 40226

Respondent.

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

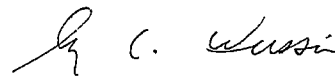
**DECISION AND ORDER**

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 April 2, 2014.

It is so ORDERED on March 28, 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 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
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7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:  
12 **SHERRI LIN OXFORD**  
6139 W. Alameda Rd.  
13 Glendale, AZ 85310  
14 **Original Pharmacist License No. RPH 40226**  
15 Respondent.

Case No. 4816

OAH No. 2013100775

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

16  
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
18 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 Kristina T. Jansen, Deputy Attorney  
23 General.

24 2. Sherri Lin Oxford (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 August 25, 1986, the Board of Pharmacy issued Original Pharmacist  
27 License No. RPH 40226 to Sherri Lin Oxford (Respondent). The Original Pharmacist License

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1 was in full force and effect at all times relevant to the charges brought in Accusation No. 4816  
2 and will expire on September 30, 2015, unless renewed.

3 **JURISDICTION**

4 4. Accusation No. 4816 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 September 13, 2013.

7 Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation  
8 No. 4816 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. 4816. 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. 4816, agrees that cause exists for discipline and hereby surrenders her Original Pharmacist  
25 License No. RPH 40226 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 Original Pharmacist License without further process.

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**CONTINGENCY**

10. This stipulation shall be subject to approval by the Board of Pharmacy. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Pharmacy may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Surrender of License and Order, including Portable Document Format (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

12. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

**ORDER**

IT IS HEREBY ORDERED that Original Pharmacist License No. RPH 40226, issued to Respondent Sherri Lin Oxford, is surrendered and accepted by the Board of Pharmacy.

1. The surrender of Respondent's Original Pharmacist License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent.

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1 This stipulation constitutes a record of the discipline and shall become a part of Respondent's  
2 license history with the Board of Pharmacy.

3 2. Respondent shall lose all rights and privileges as a Registered Pharmacist in  
4 California as of the effective date of the Board's Decision and Order.

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

7 4. If she ever applies for licensure or petitions for reinstatement in the State of  
8 California, the Board shall treat it as a new application for licensure. Respondent shall not be  
9 eligible to apply for licensure for three (3) years from the effective date of the Decision and  
10 Order. Respondent must comply with all the laws, regulations and procedures for licensure in  
11 effect at the time the application or petition is filed, and all of the charges and allegations  
12 contained in Accusation No. 4816 shall be deemed to be true, correct and admitted by  
13 Respondent when the Board determines whether to grant or deny the application or petition.

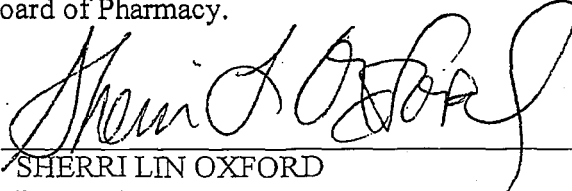
14 5. Respondent shall pay the agency its costs of investigation and enforcement in the  
15 amount of \$1,530.00 prior to issuance of a new or reinstated license.

16 6. If Respondent should ever apply or reapply for a new license or certification, or  
17 petition for reinstatement of a license, by any other health care licensing agency in the State of  
18 California, all of the charges and allegations contained in Accusation, No. 4816 shall be deemed  
19 to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any  
20 other proceeding seeking to deny or restrict licensure.

21 **ACCEPTANCE**

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

26  
27 DATED: 4/12/2014

  
28 SHERRI LIN OXFORD  
Respondent

**ENDORSEMENT**

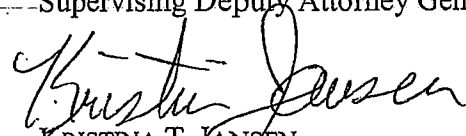
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The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

Dated:

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
JANICE K. LACHMAN  
Supervising Deputy Attorney General

  
KRISTINA T. JANSEN  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 4816**

1 KAMALA D. HARRIS  
Attorney General of California  
2 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
3 KRISTINA T. JANSEN  
Deputy Attorney General  
4 State Bar No. 258229  
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5 P.O. Box 944255  
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10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:	Case No. 4816
12 <b>SHERRI LIN OXFORD</b>	<b>A C C U S A T I O N</b>
13 <b>6139 W. Alameda Rd.</b>	
14 <b>Glendale, AZ 85310</b>	
15 <b>Original Pharmacist License No. RPH 40226</b>	
16 Respondent.	

17 Complainant alleges:

18 **PARTIES**

- 19 1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity as  
20 the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.
- 21 2. On or about August 25, 1986, the Board of Pharmacy issued Original Pharmacist  
22 License Number RPH 40226 to Sherri Lin Oxford (Respondent). The Original Pharmacist License  
23 was in full force and effect at all times relevant to the charges brought herein and will expire on  
24 September 30, 2013, 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 unless otherwise indicated.





1 **CAUSE FOR DISCIPLINE**

2 **(Out of State Discipline)**

3 8. Respondent is subject to disciplinary action under Code section 4301, subsection (n) in  
4 that on or about September 27, 2012, Respondent was disciplined by the Arizona Board of  
5 Pharmacy with a suspension of license of not less than six (6) months, entry to a Pharmacists  
6 Assisting Pharmacists Program, and a probation period of not less than five (5) years under  
7 specified terms and conditions. The circumstances are as follows:

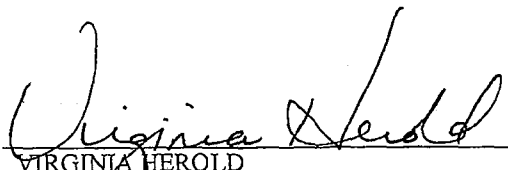
8 9. On or about April 2, 2012, Respondent was employed at a pharmacy in Arizona, and  
9 was on duty when other employees observed behaviors that led them to believe she was  
10 intoxicated. Respondent was required to take a blood alcohol test and tested positive for 0.07%  
11 blood alcohol by volume.

12 **PRAYER**

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

- 15 1. Revoking or suspending Original Pharmacist License Number RPH 40226, issued to  
16 Sherri Lin Oxford.;
- 17 2. Ordering Sherri Lin Oxford to pay the Board of Pharmacy the reasonable costs of the  
18 investigation and enforcement of this case, pursuant to Business and Professions Code section  
19 125.3;
- 20 3. Taking such other and further action as deemed necessary and proper.

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22  
23 DATED: 9/6/13

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

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