

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

In the Matter of the Accusation Against:

**HANFORD COMMUNITY HOSPITAL  
DbA ADVENTIST MEDICAL CENTER  
115 Mall Drive  
Hanford, CA 93230**

**Original Permit Number No. HSP 30446**

and

**DEBORAH ANN CAMACHO  
371 McCreary  
Hanford, CA 93230**

**Original Pharmacist License No. RPH 41441**

Case No. 5419

OAH No. 2015110545

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER [DEBORAH  
ANN CAMACHO ONLY]**

\_\_\_\_\_ Respondents.

**DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary Order is here by adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This decision shall become effective at 5:00 p.m. on September 9, 2016.

It is so ORDERED on August 10, 2016.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA



By

\_\_\_\_\_  
Amy Gutierrez, Pharm.D.  
Board President

1 KAMALA D. HARRIS  
Attorney General of California  
2 KENT D. HARRIS  
Supervising Deputy Attorney General  
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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. 5419

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**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER [DEBORAH  
ANN CAMACHO ONLY]**

16 **and**

17 **DEBORAH ANN CAMACHO**  
18 **371 McCreary**  
**Hanford, CA 93230**

19 **Original Pharmacist License No. RPH 41441**

20 Respondents.

21  
22 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties to the above-  
23 entitled proceedings that the following matters are true:

24 **PARTIES**

25 1. Virginia Herold (Complainant) is the Executive Officer of the Board of Pharmacy.  
26 She brought this action solely in her official capacity and is represented in this matter by Kamala  
27

1 D. Harris, Attorney General of the State of California, by Phillip L. Arthur, Deputy Attorney  
2 General.

3 2. Respondent Deborah Ann Camacho ("Respondent Camacho") is represented in this  
4 proceeding by attorney George L. Strasser, whose address is: Baker Manock & Jensen, PC, 5260  
5 North Palm Avenue, Fourth Floor, Fresno, CA 93704.

6 3. On or about November 1, 1984, the Board of Pharmacy issued Original Permit  
7 Number HSP 30446 to Hanford Community Hospital dba Adventist Medical Center (Respondent  
8 Hanford). The Original Permit was in full force and effect at all times relevant to the charges  
9 brought in Accusation No. 5419 and will expire on November 1, 2016, unless renewed.

10 4. On or about November 2, 1987, the Board of Pharmacy issued Original Pharmacist  
11 License Number RPH 41441 to Deborah Ann Camacho (Respondent Camacho). The Original  
12 Pharmacist License was in full force and effect at all times relevant to the charges brought in  
13 Accusation No. 5419 and will expire on March 31, 2017, unless renewed.

14 5. From December 5, 1996 through April 16, 2015, Respondent Camacho served as the  
15 Pharmacist-in-Charge at Respondent Hanford.

16 JURISDICTION

17 6. Accusation No. 5419 was filed before the Board of Pharmacy (Board), Department of  
18 Consumer Affairs, and is currently pending against Respondent. The Accusation and all other  
19 statutorily required documents were properly served on Respondents on October 27, 2015.  
20 Respondents timely filed its Notices of Defense contesting the Accusation.

21 7. A copy of Accusation No. 5419 is attached as Exhibit A and incorporated herein by  
22 reference.

23 ADVISEMENT AND WAIVERS

24 8. Respondent Camacho has carefully read, fully discussed with counsel, and  
25 understands the charges and allegations in Accusation No. 5419. Respondent Camacho has also  
26 carefully read, fully discussed with counsel, and understands the effects of this Stipulated  
27 Settlement and Disciplinary Order.

28 ///

1 9. Respondent Camacho is fully aware of her legal rights in this matter, including the  
2 right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-  
3 examine the witnesses against her; the right to present evidence and testify on her own behalf; the  
4 right to the issuance of subpoenas to compel the attendance of witnesses and the production of  
5 documents; the right to reconsideration and court review of an adverse decision; and all other  
6 rights accorded by the California Administrative Procedure Act and other applicable laws.

7 10. Respondent Camacho voluntarily, knowingly, and intelligently waives and gives up  
8 each and every right set forth above.

9 CULPABILITY

10 11. Respondent Camacho admits the truth of each and every charge and allegation in  
11 Accusation No. 5419.

12 12. Respondent Camacho agrees that her Original Pharmacist License is subject to  
13 discipline and she agrees to be bound by the Board's probationary terms as set forth in the  
14 Disciplinary Order below.

15 CONTINGENCY

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

26 14. The parties understand and agree that Portable Document Format (PDF), electronic,  
27 and facsimile copies of this Stipulated Settlement and Disciplinary Order, including PDF,  
28 electronic, and facsimile signatures thereto, shall have the same force and effect as the originals.

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

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

**DISCIPLINARY ORDER**

11            **IT IS HEREBY ORDERED** that Original Pharmacist License No. RPH 41441 issued to  
 12 Respondent Deborah Ann Camacho is revoked. However, the revocation is stayed and  
 13 Respondent Camacho is placed on probation for five (5) years on the following terms and  
 14 conditions.

15            1.    **Suspension**

16            As part of probation, Respondent Camacho is suspended from the practice of pharmacy for  
 17 ~~270 days beginning the effective date of this Decision.~~

18            During suspension, Respondent Camacho shall not enter any pharmacy area or any portion  
 19 of the licensed premises of a wholesaler, veterinary food-animal drug retailer, or any other  
 20 distributor of drugs which is licensed by the Board, or any manufacturer, or where dangerous  
 21 drugs and devices or controlled substances are maintained. Respondent Camacho shall not  
 22 practice pharmacy nor do any act involving drug selection, selection of stock, manufacturing,  
 23 compounding, dispensing, or patient consultation; nor shall Respondent Camacho manage,  
 24 administer, or be a consultant to any licensee of the Board, or have access to or control the  
 25 ordering, manufacturing, or dispensing of dangerous drugs and devices or controlled substances.

26            Respondent Camacho shall not engage in any activity that requires the professional  
 27 judgment of a pharmacist. Respondent Camacho shall not direct or control any aspect of the  
 28 practice of pharmacy. Respondent Camacho shall not perform the duties of a pharmacy

1 technician or a designated representative for any entity licensed by the Board.

2 Failure to comply with this suspension shall be considered a violation of probation.

3 **2. Obey All Laws**

4 Respondent Camacho shall obey all state and federal laws and regulations.

5 Respondent Camacho shall report any of the following occurrences to the board, in writing,  
6 within seventy-two (72) hours of such occurrence:

- 7 • an arrest or issuance of a criminal complaint for violation of any provision of the  
8 Pharmacy Law, state and federal food and drug laws, or state and federal controlled  
9 substances laws
- 10 • a plea of guilty or nolo contendere in any state or federal criminal proceeding to any  
11 criminal complaint, information or indictment
- 12 • a conviction of any crime
- 13 • discipline, citation, or other administrative action filed by any state or federal agency  
14 which involves Respondent Camacho's original pharmacist license or which is related  
15 to the practice of pharmacy or the manufacturing, obtaining, handling, distributing,  
16 billing, or charging for any drug, device, or controlled substance.

17 ~~Failure to timely report such occurrence shall be considered a violation of probation.~~

18 **3. Report to the Board**

19 Respondent Camacho shall report to the Board quarterly, on a schedule as directed by the  
20 Board or its designee. The report shall be made either in person or in writing, as directed.  
21 Among other requirements, Respondent Camacho shall state in each report under penalty of  
22 perjury whether there has been compliance with all the terms and conditions of probation. Failure  
23 to submit timely reports in a form as directed shall be considered a violation of probation. Any  
24 period(s) of delinquency in submission of reports as directed may be added to the total period of  
25 probation. Moreover, if the final probation report is not made as directed, probation shall be  
26 automatically extended until such time as the final report is made and accepted by the Board.

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1           **4. Interview with the Board**

2           Upon receipt of reasonable prior notice, Respondent Camacho shall appear in person for  
3 interviews with the Board or its designee, at such intervals and locations as are determined by the  
4 Board or its designee. Failure to appear for any scheduled interview without prior notification to  
5 Board staff, or failure to appear for two (2) or more scheduled interviews with the Board or its  
6 designee during the period of probation, shall be considered a violation of probation.

7           **5. Cooperate with Board Staff**

8           Respondent Camacho shall cooperate with the Board's inspection program and with the  
9 Board's monitoring and investigation of Respondent Camacho's compliance with the terms and  
10 conditions of her probation. Failure to cooperate shall be considered a violation of probation.

11           **6. Continuing Education**

12           Respondent Camacho shall provide evidence of efforts to maintain skill and knowledge as a  
13 pharmacist as directed by the Board or its designee.

14           **7. Notice to Employers**

15           During the period of probation, Respondent Camacho shall notify all present and  
16 prospective employers of the Decision in case number 5419 and the terms, conditions, and  
17 restrictions imposed on Respondent Camacho by the Decision, as follows:

18           Within thirty (30) days of the effective date of this Decision, and within fifteen (15) days of  
19 Respondent Camacho undertaking any new employment, Respondent Camacho shall cause her  
20 direct supervisor, pharmacist-in-charge (including each new pharmacist-in-charge employed  
21 during Respondent Camacho's tenure of employment), and owner to report to the Board in  
22 writing acknowledging that the listed individual(s) has/have read the Decision in case number  
23 5419, and terms and conditions imposed thereby. It shall be Respondent Camacho's  
24 responsibility to ensure that her employer(s) and/or supervisor(s) submit timely  
25 acknowledgment(s) to the Board.

26           If Respondent Camacho works for or is employed by or through a pharmacy employment  
27 service, Respondent Camacho must notify her direct supervisor, pharmacist-in-charge, and owner  
28 at every entity licensed by the Board of the terms and conditions of the Decision in case number

1 5419 in advance of Respondent Camacho commencing work at each licensed entity. A record of  
2 this notification must be provided to the Board upon request.

3 Furthermore, within thirty (30) days of the effective date of this Decision, and within fifteen  
4 (15) days of Respondent Camacho undertaking any new employment by or through a pharmacy  
5 employment service, Respondent Camacho shall cause her direct supervisor with the pharmacy  
6 employment service to report to the Board in writing acknowledging that they have read the  
7 Decision in case number 5419 and the terms and conditions imposed thereby. It shall be  
8 Respondent Camacho's responsibility to ensure that her employer(s) and/or supervisor(s) submit  
9 timely acknowledgment(s) to the Board.

10 Failure to timely notify present or prospective employer(s) or to cause that/those  
11 employer(s) to submit timely acknowledgments to the Board shall be considered a violation of  
12 probation.

13 ~~"Employment" within the meaning of this provision shall include any full-time,~~  
14 ~~part-time, temporary, relief or pharmacy management service as a pharmacist or any~~  
15 ~~position for which a pharmacist license is a requirement or criterion for employment,~~  
16 ~~whether Respondent Camacho is an employee, independent contractor, or volunteer.~~

17 **8. No Supervision of Interns, Serving as Pharmacist-in-Charge (PIC), Serving as**  
18 **Designated Representative-in-Charge, or Serving as a Consultant**

19 During the period of probation, Respondent Camacho shall not supervise any intern  
20 pharmacist, be the pharmacist-in-charge or designated representative-in-charge of any entity  
21 licensed by the Board, nor serve as a consultant unless otherwise specified in this Order.  
22 Assumption of any such unauthorized supervision responsibilities shall be considered a violation  
23 of probation.

24 **9. Reimbursement of Board Costs**

25 As a condition precedent to successful completion of probation, Respondent Camacho shall  
26 pay to the Board its costs of investigation and prosecution in the amount of \$11,907.50.  
27 Respondent Camacho shall be permitted to pay these costs in a payment plan approved by the  
28 Board.



1           There shall be no deviation from the payment schedule absent prior written approval by the  
2 Board or its designee. Failure to pay costs by the deadline(s) as directed shall be considered a  
3 violation of probation.

4           The filing of bankruptcy by Respondent Camacho shall not relieve Respondent Camacho of  
5 her responsibility to reimburse the Board its costs of investigation and prosecution.

6           **10. Probation Monitoring Costs**

7           Respondent Camacho shall pay any costs associated with probation monitoring as  
8 determined by the Board each and every year of probation. Such costs shall be payable to the  
9 Board on a schedule as directed by the Board or its designee. Failure to pay such costs by the  
10 deadline(s) as directed shall be considered a violation of probation.

11           **11. Status of License**

12           Respondent Camacho shall, at all times while on probation, maintain an active, current  
13 ~~license with the Board, including any period during which suspension or probation is tolled.~~  
14 Failure to maintain an active, current license shall be considered a violation of probation.

15           If Respondent Camacho's license expires or is cancelled by operation of law or otherwise at  
16 any time during the period of probation, including any extensions thereof due to tolling or  
17 ~~otherwise, upon renewal or reapplication Respondent Camacho's license shall be subject to all~~  
18 terms and conditions of this probation not previously satisfied.

19           **12. License Surrender While on Probation/Suspension**

20           Following the effective date of this Decision, should Respondent Camacho cease practice  
21 due to retirement or health, or be otherwise unable to satisfy the terms and conditions of  
22 probation, Respondent Camacho may tender her license to the Board for surrender. The Board or  
23 its designee shall have the discretion whether to grant the request for surrender or take any other  
24 action it deems appropriate and reasonable. Upon formal acceptance of the surrender of the  
25 license, Respondent Camacho will no longer be subject to the terms and conditions of probation.  
26 This surrender constitutes a record of discipline and shall become a part of Respondent  
27 Camacho's license history with the Board.

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1           Upon acceptance of the surrender, Respondent Camacho shall relinquish her pocket and  
2 wall license to the Board within ten (10) days of notification by the Board that the surrender is  
3 accepted. Respondent Camacho may not reapply for any license from the Board for three (3)  
4 years from the effective date of the surrender. Respondent Camacho shall meet all requirements  
5 applicable to the license sought as of the date the application for that license is submitted to the  
6 Board, including any outstanding costs.

7           **13. Notification of a Change in Name, Residence Address, Mailing Address, or**  
8 **Employment**

9           Respondent Camacho shall notify the Board in writing within ten (10) days of any change  
10 of employment. Said notification shall include the reasons for leaving, the address of the new  
11 employer, the name of the supervisor and owner, and the work schedule if known. Respondent  
12 Camacho shall further notify the Board in writing within ten (10) days of a change in name,  
13 residence address, mailing address, or phone number.

14           Failure to timely notify the board of any change in employer(s), name(s), address(es), or  
15 phone number(s) shall be considered a violation of probation.

16           **14. Tolling of Probation**

17           Except during periods of suspension, Respondent Camacho shall, at all times while on  
18 probation, be employed as a pharmacist in California for a minimum of 40 hours per calendar  
19 month. Any month during which this minimum is not met shall toll the period of probation, i.e.,  
20 the period of probation shall be extended by one month for each month during which this  
21 minimum is not met. During any such period of tolling of probation, Respondent Camacho must  
22 nonetheless comply with all terms and conditions of probation.

23           Should Respondent Camacho, regardless of residency, for any reason (including vacation)  
24 cease practicing as a pharmacist for a minimum of 40 hours per calendar month in California,  
25 Respondent Camacho must notify the Board in writing within ten (10) days of the cessation of  
26 practice, and must further notify the Board in writing within ten (10) days of the resumption of  
27 practice. Any failure to provide such notification(s) shall be considered a violation of probation.

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1 It is a violation of probation for Respondent Camacho's probation to remain tolled pursuant  
2 to the provisions of this condition for a total period, counting consecutive and non-consecutive  
3 months, exceeding thirty-six (36) months.

4 "Cessation of practice" means any calendar month during which Respondent  
5 Camacho is not practicing as a pharmacist for at least 40 hours, as defined by  
6 Business and Professions Code section 4000 et seq. "Resumption of practice" means  
7 any calendar month during which Respondent Camacho is practicing as a pharmacist  
8 for at least 40 hours as a pharmacist as defined by Business and Professions Code  
9 section 4000 et seq.

10 **15. Violation of Probation**

11 If Respondent Camacho has not complied with any term or condition of probation, the  
12 Board shall have continuing jurisdiction over Respondent Camacho, and probation shall  
13 automatically be extended, until all terms and conditions have been satisfied or the Board has  
14 taken other action as deemed appropriate to treat the failure to comply as a violation of probation,  
15 to terminate probation, and to impose the penalty that was stayed.

16 If Respondent Camacho violates probation in any respect, the Board, after giving  
17 ~~Respondent Camacho notice and an opportunity to be heard, may revoke probation and carry out~~  
18 the disciplinary order that was stayed. Notice and opportunity to be heard are not required for  
19 those provisions stating that a violation thereof may lead to automatic termination of the stay  
20 and/or revocation of the license. If a petition to revoke probation or an accusation is filed against  
21 Respondent Camacho during probation, the Board shall have continuing jurisdiction and the  
22 period of probation shall be automatically extended until the petition to revoke probation or  
23 accusation is heard and decided.

24 **16. Completion of Probation**

25 Upon written notice by the Board or its designee indicating successful completion of  
26 probation, Respondent Camacho's license will be fully restored.

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1           **17. Community Services Program**

2           Within sixty (60) days of the effective date of this Decision, Respondent Camacho shall  
3 submit to the Board or its designee, for prior approval, a community service program in which  
4 Respondent Camacho shall provide free health-care related services on a regular basis to a  
5 community or charitable facility or agency for at least 96 hours per year for the first three years of  
6 probation. Within thirty (30) days of Board approval thereof, Respondent Camacho shall submit  
7 documentation to the Board demonstrating commencement of the community service program. A  
8 record of this notification must be provided to the Board upon request. Respondent Camacho  
9 shall report on progress with the community service program in the quarterly reports. Failure to  
10 timely submit, commence, or comply with the program shall be considered a violation of  
11 probation.

12           **18. Remedial Education**

13           ~~Within thirty (30) days of the effective date of this Decision, Respondent Camacho shall~~  
14 ~~submit to the Board or its designee, for prior approval, an appropriate program of remedial~~  
15 ~~education related to pharmacy management, pharmacy law, and controlled substances. The~~  
16 ~~program of remedial education shall consist of at least ten hours per year, for the first three years~~  
17 ~~of probation, which shall be completed at Respondent Camacho's own expense. All remedial~~  
18 ~~education shall be in addition to, and shall not be credited toward, continuing education (CE)~~  
19 ~~courses used for license renewal purposes.~~

20           Failure to timely submit or complete the approved remedial education shall be considered a  
21 violation of probation. The period of probation will be automatically extended until such  
22 remedial education is successfully completed and written proof, in a form acceptable to the  
23 Board, is provided to the Board or its designee.

24           Following the completion of each course, the Board or its designee may require Respondent  
25 Camacho, at her own expense, to take an approved examination to test Respondent Camacho's  
26 knowledge of the course. If Respondent Camacho does not achieve a passing score on the  
27 examination, this failure shall be considered a violation of probation. Any such examination  
28 failure shall require Respondent Camacho to take another course approved by the Board in the

1 same subject area.

2 **19. Supervised Practice**

3 During the period of probation, Respondent Camacho shall practice only under the  
4 supervision of a licensed pharmacist not on probation with the Board. Upon and after the  
5 effective date of this Decision, Respondent Camacho shall not practice pharmacy and her license  
6 shall be automatically suspended until a supervisor is approved by the Board or its designee. The  
7 supervision shall be, as required by the Board or its designee, either:

8 Continuous – At least 75% of a work week

9 Substantial - At least 50% of a work week

10 Partial - At least 25% of a work week

11 Daily Review - Supervisor's review of probationer's daily activities within 24 hours

12 Within thirty (30) days of the completion of the suspension of Respondent Camacho's  
13 ~~license, Respondent Camacho shall have her supervisor submit notification to the Board in~~  
14 ~~writing stating that the supervisor has read the Decision in case number 5419 and is familiar with~~  
15 ~~the required level of supervision as determined by the Board or its designee. It shall be~~  
16 ~~Respondent Camacho's responsibility to ensure that her employer(s), pharmacist-in-charge,~~  
17 ~~and/or supervisor(s) submit timely acknowledgement(s) to the Board. Failure to cause the direct~~  
18 ~~supervisor and the pharmacist-in-charge to submit timely acknowledgements to the Board shall~~  
19 ~~be considered a violation of probation.~~

20 If Respondent Camacho changes employment, it shall be Respondent Camacho's  
21 responsibility to ensure that her employer(s), pharmacist-in-charge, and/or supervisor(s) submit  
22 timely acknowledgement(s) to the Board. Respondent Camacho shall have her new supervisor,  
23 within fifteen (15) days after employment commences, submit notification to the Board in writing  
24 stating the direct supervisor and pharmacist-in-charge have read the Decision in case number  
25 5419 and are familiar with the level of supervision as determined by the Board. Respondent  
26 Camacho shall not practice pharmacy and her license shall be automatically suspended until the  
27 Board or its designee approves a new supervisor. Failure to cause the direct supervisor and the  
28 pharmacist-in-charge to submit timely acknowledgements to the Board shall be considered a

1 violation of probation.

2 Within ten (10) days of leaving employment, Respondent Camacho shall notify the Board  
3 in writing.

4 During suspension, Respondent Camacho shall not enter any pharmacy area or any portion  
5 of the licensed premises of a wholesaler, veterinary food-animal drug retailer, or any other  
6 distributor of drugs which is licensed by the Board, or any manufacturer, or where dangerous  
7 drugs and devices or controlled substances are maintained. Respondent Camacho shall not  
8 practice pharmacy nor do any act involving drug selection, selection of stock, manufacturing,  
9 compounding, dispensing, or patient consultation; nor shall Respondent Camacho manage,  
10 administer, or be a consultant to any licensee of the Board, or have access to or control the  
11 ordering, manufacturing, or dispensing of dangerous drugs and controlled substances.  
12 Respondent Camacho shall not resume practice until notified by the Board.

13 During suspension, Respondent Camacho shall not engage in any activity that requires the  
14 professional judgment of a pharmacist. Respondent Camacho shall not direct or control any  
15 aspect of the practice of pharmacy. Respondent Camacho shall not perform the duties of a  
16 pharmacy technician or a designated representative for any entity licensed by the Board.

17 ~~Subject to the above restrictions, Respondent Camacho may continue to own or hold an~~  
18 ~~interest in any licensed premises in which she holds an interest at the time this Decision becomes~~  
19 ~~effective unless otherwise specified in this Order.~~

20 Failure to comply with this suspension shall be considered a violation of probation.

21 **20. No Ownership of Licensed Premises**

22 Respondent Camacho shall not own, have any legal or beneficial interest in, or serve as a  
23 manager, administrator, member, officer, director, trustee, associate, or partner of any business,  
24 firm, partnership, or corporation currently or hereinafter licensed by the Board. Respondent  
25 Camacho shall sell or transfer any legal or beneficial interest in any entity licensed by the Board  
26 within ninety (90) days following the effective date of this Decision and shall immediately  
27 thereafter provide written proof thereof to the Board. Failure to timely divest any legal or  
28 beneficial interest(s) or provide documentation thereof shall be considered a violation of

1 probation.

2 21. Tolling of Suspension

3 During the period of suspension, Respondent Camacho shall not leave California for any  
4 period exceeding ten (10) days, regardless of purpose (including vacation). Any such absence in  
5 excess of the (10) days during suspension shall be considered a violation of probation. Moreover,  
6 any absence from California during the period of suspension exceeding ten (10) days shall toll the  
7 suspension, i.e., the suspension shall be extended by one day for each day over ten (10) days  
8 Respondent Camacho is absent from California. During any such period of tolling of suspension,  
9 Respondent Camacho must nonetheless comply with all terms and conditions of probation.

10 Respondent Camacho must notify the Board in writing within ten (10) days of departure,  
11 and must further notify the Board in writing within ten (10) days of return. The failure to provide  
12 such notification(s) shall constitute a violation of probation. Upon such departure and return,

13 Respondent Camacho shall not resume the practice of pharmacy until notified by the Board that  
14 the period of suspension has been satisfactorily completed.

15 ACCEPTANCE

16 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
17 discussed it with my attorney, George L. Strasser. I understand the stipulation and the effect it  
18 will have on my Original Pharmacist License. I enter into this Stipulated Settlement and  
19 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
20 Decision and Order of the Board of Pharmacy.

21  
22 DATED: 6/21/2016   
23 DEBORAH ANN CAMACHO  
24 Respondent

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I have read and fully discussed with Respondent Deborah Ann Camacho the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.

I approve its form and content.

DATED: 6/21/2016

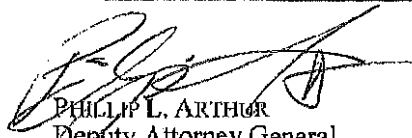
  
GEORGE L. STRASSER  
*Attorney for Respondent Camacho*

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Pharmacy.

Dated: 6/21/16

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

  
PHILLIP L. ARTHUR  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 5419**

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

In the Matter of the Accusation Against:  
**HANFORD COMMUNITY HOSPITAL  
dba ADVENTIST MEDICAL CENTER**  
115 Mall Drive  
Hanford, CA 93230  
  
Original Permit Number No. HSP 30446  
  
and  
**DEBORAH ANN CAMACHO**  
371 McCreary  
Hanford, CA 93230  
  
Original Pharmacist License No. RPH 41441  
  
Respondents.

Case No. 5419

**ACCUSATION**

Complainant alleges:

**PARTIES**

1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.
2. On or about November 1, 1984, the Board of Pharmacy issued Original Permit Number HSP 30446 to Hanford Community Hospital dba Adventist Medical Center (Respondent Hanford). Deborah Ann Camacho is and has been the Pharmacist-In-Charge at Respondent

1 Hanford since December 5, 1996. The Original Permit was in full force and effect at all times  
2 relevant to the charges brought herein and will expire on November 1, 2015, unless renewed.

3 3. On or about November 2, 1987, the Board of Pharmacy issued Original Pharmacist  
4 License Number RPH 41441 to Deborah Ann Camaoho (Respondent Camaoho). The Original  
5 Pharmacist License was in full force and effect at all times relevant to the charges brought herein  
6 and will expire on March 31, 2017, unless renewed.

7 **JURISDICTION**

8 4. This Accousation 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 5. Code section 4300.1 states:

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

18 **BUSINESS AND PROFESSIONS CODE**

19 6. Code section 4029 states:

20 (a) "Hospital pharmacy" means and includes a pharmacy, licensed by the  
21 board, located within any licensed hospital, institution, or establishment that  
22 maintains and operates organized facilities for the diagnosis, care, and treatment of  
23 human illnesses to which persons may be admitted for overnight stay and that meets  
24 all of the requirements of this chapter and the rules and regulations of the board.

25 (b) A hospital pharmacy also includes a pharmacy that may be located  
26 outside of the hospital in another physical plant that is regulated under a hospital's  
27 consolidated license issued pursuant to Section 1250.8 of the Health and Safety  
28 Code. As a condition of licensure by the board, the pharmacy in another physical  
plant shall provide pharmaceutical services only to registered hospital patients who  
are on the premises of the same physical plant in which the pharmacy is located,  
except as provided in Article 7.6 (commencing with Section 4128). The pharmacy  
services provided shall be directly related to the services or treatment plan  
administered in the physical plant. Nothing in this subdivision shall be construed to  
restrict or expand the services that a hospital pharmacy may provide.

7. Code section 4059(a) states, "A person may not furnish any dangerous drug, except  
upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic  
doctor pursuant to Section 3640.7. A person may not furnish any dangerous device, except upon

1 the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor  
2 pursuant to Section 3640.7.”

3 8. Code section 4059.5 states, in pertinent part:

4 (a) Except as otherwise provided in this chapter, dangerous drugs or  
5 dangerous devices may only be ordered by an entity licensed by the board and shall be  
6 delivered to the licensed premises and signed for and received by a pharmacist. Where  
7 a licensee is permitted to operate through a designated representative, the designated  
8 representative shall sign for and receive the delivery.

9 (b) A dangerous drug or dangerous device transferred, sold, or delivered  
10 to a person within this state shall be transferred, sold, or delivered only to an entity  
11 licensed by the board, to a manufacturer, or to an ultimate user or the ultimate user's  
12 agent. . . .

13 9. Code section 4060 states, in pertinent part:

14 A person shall not possess any controlled substance, except that furnished to  
15 a person upon the prescription of a physician, dentist, podiatrist, optometrist,  
16 veterinarian, or naturopathic doctor pursuant to Section 3640.7, or furnished  
17 pursuant to a drug order issued by a certified nurse-midwife pursuant to Section  
18 2746.51, a nurse practitioner pursuant to Section 2836.1, a physician assistant  
19 pursuant to Section 3502.1, a naturopathic doctor pursuant to Section 3640.5, or a  
20 pharmacist pursuant to Section 4052.1, 4052.2, or 4052.6. This section does not  
21 apply to the possession of any controlled substance by a manufacturer, wholesaler,  
22 third-party logistics provider, pharmacy, pharmacist, physician, podiatrist, dentist,  
23 optometrist, veterinarian, naturopathic doctor, certified nurse-midwife, nurse  
24 practitioner, or physician assistant, if in stock in containers correctly labeled with the  
25 name and address of the supplier or producer. . . .

26 10. Code section 4068(a) states:

27 (a) Notwithstanding any provision of this chapter, a prescriber may  
28 dispense a dangerous drug, including a controlled substance, to an emergency room  
patient if all of the following apply:

- 29 (1) The hospital pharmacy is closed and there is no pharmacist  
30 available in the hospital.
- 31 (2) The dangerous drug is acquired by the hospital pharmacy.
- 32 (3) The dispensing information is recorded and provided to the  
33 pharmacy when the pharmacy reopens.
- 34 (4) The hospital pharmacy retains the dispensing information and, if  
35 the drug is a schedule II, schedule III, or schedule IV controlled substance, reports the  
36 dispensing information to the Department of Justice pursuant to Section 11165 of the  
37 Health and Safety Code.
- 38 (5) The prescriber determines that it is in the best interest of the patient  
that a particular drug regimen be immediately commenced or continued, and the  
prescriber reasonably believes that a pharmacy located outside the hospital is not  
available and accessible at the time of dispensing to the patient.

1 (6) The quantity of drugs dispensed to any patient pursuant to this  
2 section are limited to that amount necessary to maintain uninterrupted therapy during  
the period when pharmacy services outside the hospital are not readily available or  
accessible, but shall not exceed a 72-hour supply.

3 (7) The prescriber shall ensure that the label on the drug contains all  
4 the information required by Section 4076.

5 11. Code section 4081 states:

6 (a) All records of manufacture and of sale, acquisition, receipt, shipment,  
7 or disposition of dangerous drugs or dangerous devices shall be at all times during  
business hours open to inspection by authorized officers of the law, and shall be  
8 preserved for at least three years from the date of making. A current inventory shall be  
9 kept by every manufacturer, wholesaler, third-party logistics provider, pharmacy,  
10 veterinary food-animal drug retailer, physician, dentist, podiatrist, veterinarian,  
laboratory, clinic, hospital, institution, or establishment holding a currently valid and  
11 unrevoked certificate, license, permit, registration, or exemption under Division 2  
(commencing with Section 1200) of the Health and Safety Code or under Part 4  
(commencing with Section 16000) of Division 9 of the Welfare and Institutions Code  
who maintains a stock of dangerous drugs or dangerous devices.

12 (b) The owner, officer, and partner of a pharmacy, wholesaler, third-party  
13 logistics provider, or veterinary food-animal drug retailer shall be jointly responsible,  
with the pharmacist-in-charge, responsible manager, or designated representative-in-  
charge, for maintaining the records and inventory described in this section.

14 (c) The pharmacist-in-charge, responsible manager, or designated  
15 representative-in-charge shall not be criminally responsible for acts of the owner,  
officer, partner, or employee that violate this section and of which the pharmacist-in-  
16 charge, responsible manager, or designated representative-in-charge had no  
knowledge, or in which he or she did not knowingly participate.

17 12. Code section 4104(c) states:

18 Every pharmacy shall report and provide to the board, within 14 days of  
19 the receipt or development thereof, the following information with regard to any  
licensed individual employed by or with the pharmacy:

20 (1) Any admission by a licensed individual of chemical, mental, or  
21 physical impairment affecting his or her ability to practice.

22 (2) Any admission by a licensed individual of theft, diversion, or  
self-use of dangerous drugs.

23 (3) Any video or documentary evidence demonstrating chemical,  
24 mental, or physical impairment of a licensed individual to the extent it affects his or  
her ability to practice.

25 (4) Any video or documentary evidence demonstrating theft,  
26 diversion, or self-use of dangerous drugs by a licensed individual.

27 (5) Any termination based on chemical, mental, or physical  
28 impairment of a licensed individual to the extent it affects his or her ability to  
practice.

1 (6) Any termination of a licensed individual based on theft,  
diversion, or self-use of dangerous drugs.

2 13. Code section 4113 states, in pertinent part:

3 (a) Every pharmacy shall designate a pharmacist-in-charge and, within 30  
4 days thereof, shall notify the board in writing of the identity and license number of  
that pharmacist and the date he or she was designated.

5 ...

6 (c) The pharmacist-in-charge shall be responsible for a pharmacy's  
7 compliance with all state and federal laws and regulations pertaining to the practice  
of pharmacy. ...

8 14. Code section 4300 states, in pertinent part:

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

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

12 (1) Suspending judgment.

13 (2) Placing him or her upon probation.

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

16 (4) Revoking his or her license.

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

18 15. Code section 4301 states, in pertinent part:

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

22 ...

23 (c) Gross negligence

24 ...

25 (q) Engaging in any conduct that subverts or attempts to subvert an  
investigation of the board. ...

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1 16. Code section 4332 states, "Any person who fails, neglects, or refuses to maintain the  
2 records required by Section 4081 or who, when called upon by an authorized officer or a member  
3 of the board, fails, neglects, or refuses to produce or provide the records within a reasonable time,  
4 or who willfully produces or furnishes records that are false, is guilty of a misdemeanor."

5 **HEALTH AND SAFETY CODE**

6 17. Health and Safety Code section 11165(d) states:

7 For each prescription for a Schedule II, Schedule III, or Schedule IV  
8 controlled substance, as defined in the controlled substances schedules in federal law  
9 and regulations, specifically Sections 1308.12, 1308.13, and 1308.14, respectively, of  
10 Title 21 of the Code of Federal Regulations, the dispensing pharmacy, clinic, or other  
11 dispenser shall report the following information to the Department of Justice as soon  
12 as reasonably possible, but not more than seven days after the date a controlled  
13 substance is dispensed, in a format specified by the Department of Justice:

14 (1) Full name, address, and, if available, telephone number of the  
15 ultimate user or research subject, or contact information as determined by the  
16 Secretary of the United States Department of Health and Human Services, and the  
17 gender, and date of birth of the ultimate user.

18 (2) The prescriber's category of licensure, license number, national  
19 provider identifier (NPI) number, if applicable, the federal controlled substance  
20 registration number, and the state medical license number of any prescriber using the  
21 federal controlled substance registration number of a government-exempt facility.

22 (3) Pharmacy prescription number, license number, NPI number, and  
23 federal controlled substance registration number.

24 (4) National Drug Code (NDC) number of the controlled substance  
25 dispensed.

26 (5) Quantity of the controlled substance dispensed.

27 (6) International Statistical Classification of Diseases, 9th revision  
28 (ICD-9) or 10th revision (ICD-10) Code, if available.

(7) Number of refills ordered.

(8) Whether the drug was dispensed as a refill of a prescription or as a  
first-time request.

(9) Date of origin of the prescription.

(10) Date of dispensing of the prescription.

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18. Health and Safety Code section 11207 states:

(a) No person other than a pharmacist as defined in Section 4036 of the Business and Professions Code or an intern pharmacist, as defined in Section 4030 of the Business and Professions Code, who is under the personal supervision of a pharmacist, shall compound, prepare, fill or dispense a prescription for a controlled substance.

(b) Notwithstanding subdivision (a), a pharmacy technician may perform those tasks permitted by Section 4113 of the Business and Professions Code when assisting a pharmacist dispensing a prescription for a controlled substance.

CALIFORNIA CODE OF REGULATIONS

19. California Code of Regulations, title 16, section 1714 states, in pertinent part:

(b) Each pharmacy licensed by the board shall maintain its facilities, space, fixtures, and equipment so that drugs are safely and properly prepared, maintained, secured and distributed. The pharmacy shall be of sufficient size and unobstructed area to accommodate the safe practice of pharmacy.

(d) Each pharmacist while on duty shall be responsible for the security of the prescription department, including provisions for effective control against theft or diversion of dangerous drugs and devices, and records for such drugs and devices. Possession of a key to the pharmacy where dangerous drugs and controlled substances are stored shall be restricted to a pharmacist.

20. California Code of Regulations, title 16, section 1715.6 states, "The owner shall report to the Board within thirty (30) days of discovery of any loss of the controlled substances, including their amounts and strengths."

21. California Code of Regulations, title 16, section 1793.7(b) states, "Pharmacy technicians must work under the direct supervision of a pharmacist and in such a relationship that the supervising pharmacist is fully aware of all activities involved in the preparation and dispensing of medications, including the maintenance of appropriate records."

COST RECOVERY

22. Code section 125.3 provides, in pertinent part, that a Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.



1 CONTROLLED SUBSTANCES

2 23. "Codeine Phosphate/APAP," Codeine with acetaminophen, is a dangerous drug as  
3 defined in Code section 4022, and a schedule III controlled substance as defined in Health and  
4 Safety Code section 11056(e).

5 24. "Cocaine" is a dangerous drug as defined in section 4022 of the Code and a schedule  
6 II controlled substance and narcotic as defined by section 11055(b)(6) of the Health and Safety  
7 Code.

8 25. "Fentanyl Citrate," also known by the brand name Sublimaze, is a strong analgesic,  
9 pharmacodynamically similar to meperidine and morphine. Fentanyl and fentanyl citrate  
10 preparations are Schedule II controlled substances as designated by Health and Safety Code  
11 section 11055(b)(8), and a dangerous drug within the meaning of Code section 4022.

12 26. "Hydrocodone w/APAP" (hydrocodone with acetaminophen tablets) is a  
13 semisynthetic narcotic analgesic, a dangerous drug as defined in Code section 4022, a Schedule III  
14 controlled substance and narcotic as defined by section 11056(e) of the Health and Safety Code,  
15 and a Schedule III controlled substance as defined by section 1308.13(e) of Title 21 of the Code  
16 of Federal Regulations.

17 27. "Hydromorphone Hydrochloride," also known by the brand name Dilaudid, is a semi-  
18 synthetic opioid derivative and is a Schedule II controlled substance as designated by Health and  
19 Safety Code section 11055(b)(1)(J), and a dangerous drug within the meaning of Code section  
20 4022. Hydromorphone hydrochloride is a strong analgesic used in the relief of moderate to severe  
21 pain.

22 28. "Ketamine" is a medication used mainly for starting and maintaining anesthesia.  
23 Other uses include sedation in intensive care, as a pain killer, as treatment of bronchospasm, as a  
24 treatment for complex regional pain syndrome, and as an antidepressant. It is a Schedule III  
25 controlled substance as defined by Health and Safety Code, section 11056(g).

26 29. "Meperidine Hydrochloride" is a strong synthetic opioid analgesic used in the relief of  
27 moderate to severe pain, as a pre-operative supplement to anesthesia, and to provide pain relief  
28 during labor. Also known by the brand name Demerol, meperidine hydrochloride preparations

1 are subject to control as Schedule II controlled substances as designated by Health and Safety  
2 Code section 11055(c)(17), and dangerous drugs within the meaning of Code section 4022.

3 30. "Midazolam" is a benzodiazepine, used for preoperative sedation, particularly useful  
4 when anxiety relief and diminished recall are desired. Midazolam is a Schedule IV controlled  
5 substance as designated by Health and Safety Code section 11057(d)(21), and a dangerous drug  
6 within the meaning of Code section 4022.

7 31. "Morphine Sulfate," aka as brand names Astramorph, Duramorph, MSIR, RMS  
8 Uniserts, and Roxanol, is for use in patients who require a potent opioid analgesic for relief of  
9 moderate to severe pain, and is a dangerous drug as defined in section 4022 of the Code and a  
10 Schedule II controlled substance as defined in section 11055(b)(1)(L) of the Health and Safety  
11 Code.

12 32. "Oxycodone" with acetaminophen and oxycodone with aspirin both contain  
13 oxycodone, a white-odorless crystalline powder derived from the opium alkaloid, thebaine.  
14 Oxycodone is a semisynthetic narcotic analgesic with multiple actions qualitatively similar to  
15 those of morphine. It is a dangerous drug as defined in Code section 4022, a schedule II  
16 controlled substance and narcotic as defined by section 11055(b)(1)(M) of the Health and Safety  
17 Code, and a Schedule II controlled substance as defined by section 1308.12(b)(1) of Title 21 of  
18 the Code of Federal Regulations.

19 33. "Carisoprodol" is a muscle-relaxant and sedative. It is a dangerous drug as defined in  
20 Code section 4022.

21 34. "Methadone Hydrochloride," aka as brand names Dolophine, Methadose, and  
22 Physeptone, is a synthetic narcotic analgesic with multiple actions quantitatively similar to those  
23 of morphine, it is a dangerous drug as defined in section 4211 of the Code, and a schedule II  
24 controlled substance as defined in section 11055(b)(14) of the Health and Safety Code.

25 35. "Percocet" is the trade name for the combined generic substance Oxycodone  
26 Hydrochloride and Acetaminophen is a semisynthetic narcotic analgesic with multiple actions  
27 qualitatively similar to those of morphine, and is a controlled substance as defined in Schedule II,  
28

1 section 11055(b)(1)(L) of the Health and Safety Code, Percocet is a dangerous drug as defined in  
2 Code section 4022.

3 BACKGROUND

4 36. Adventist Health Central Valley Network (Adventist) owns and operates four  
5 hospitals: Adventist Medical Center-Hanford (Respondent Hanford), Adventist Medical Center-  
6 Selma, Adventist Medical Center-Reedley, and Central Valley General Hospital. Each hospital  
7 has a pharmacy. All of Adventist's pharmacists work at each hospital. Respondent Camacho is  
8 and was the Director of Pharmacy for all four hospitals. As the Director of Pharmacy for  
9 Adventist, Camacho was responsible for the scheduling of pharmacy staff at all four of  
10 Adventist's hospitals.

11 37. After the Board received an arrest notification on Adventist's employee, E.C., a  
12 licensed pharmacist (indicating that E.C. was arrested at an airport with a large amount of  
13 controlled substances in her possession), Board Inspector D.P. conducted an investigative  
14 inspection at Respondent Hanford's pharmacy on or about March 4, 2014.

15 38. When Inspector D.P. arrived at Respondent Hanford's pharmacy, at approximately  
16 10:30 a.m., D.P. was greeted by a pharmacy technician who informed D.P. that there was no  
17 pharmacist in the pharmacy. D.P. observed approximately five people in the pharmacy, some of  
18 whom were pulling medication from the shelf.

19 39. Approximately ten to fifteen minutes after Inspector D.P.'s arrival at Respondent  
20 Hanford's pharmacy, D.P. was greeted by pharmacist A.A-K. A.A-K. relayed the following  
21 information:

22 a. A pharmacist is not scheduled to be present in the pharmacy for a number of hours in  
23 the morning.

24 b. Prescription orders were checked by "remote" pharmacists who check the data entry  
25 information on prescriptions.

26 c. Most of the prescription medication was issued from Omnicell automated dispensing  
27 machines on the floor. The Omnicell machine provided documentation of medication removed.  
28 In general, the medication could not be removed unless a prescription order was in the system.

1 There are some instances where an override of that procedure could occur, such as when there is  
2 an immediate need for medication.

3 d. The technicians fill prescriptions for orders of medication not stocked in the Omnicell  
4 machine, and dispense medication to restock the Omnicell machines.

5 e. When a medication order is ready to be checked, a pharmacist was called from their  
6 workstation on the hospital floor, to return to the pharmacy and check the prescription dispensed.

7 f. The controlled substances were kept in the Omnicell narcotic locker which only the  
8 pharmacy technicians could access. Pharmacists did not verify the counts of the controlled  
9 substances in the narcotic locker. This process was established by Respondent Camacho.

10 g. The filling process for controlled substances consisted of a pharmacy technician  
11 accessing the controlled substance narcotic locker, and the medication order and pulled controlled  
12 substance were laid on the counter for the pharmacist to check. Pharmacists did not verify  
13 narcotic counts with the technicians.

14 h. When controlled substances were received from the supplier, a pharmacist would sign  
15 for the order, open the box and count the controlled substances, compare their count against the  
16 wholesaler's invoice to verify inventory ordered and received, the controlled substances were then  
17 laid on top of the invoice on a counter near the narcotic locker, and at some point during the day  
18 the pharmacy technicians would put the controlled substances into the narcotic locker (this  
19 process was not supervised by a pharmacist).

20 i. When Omnicell discrepancies occurred from other hospital locations, the head  
21 technician ran the reports and followed up on the discrepancies.

22 40. Head technician M.M. provided Inspector D.P. with the last DEA biennial inventory,  
23 dated December 21, 2013. Schedule II medication was not separate from Schedule III-V  
24 inventory. The inventory listed two columns, "Omni count" (representing the quantity of  
25 medication that the Omnicell listed as should be present) and "Current on hand" (representing the  
26 physical quantity of medication present). Of the 120 medications listed, only sixty-six had  
27 matching counts. Head technician M.M. informed D.P. that any discrepancies on this inventory  
28 were reported to Respondent Camacho.

1 41. On or about March 7, 2014, Inspector D.P. met with Respondent Camacho.  
2 Respondent Camacho relayed the following:  
3 a. Pharmacists had access to the narcotic safe, however the pharmacists did not know  
4 how to use the Omnicell software to access it.  
5 b. Respondent Camacho did not know about the discrepancies on the last DEA  
6 inventory, dated December 21, 2013.  
7 42. After Respondent Camacho had technician M.M. open the narcotic safe, M.M.  
8 counted three medications in Inspector D.P. and Camacho's presence—morphine 30mg tablets;  
9 oxycodone 20 mg tablets; and carisoprodol 350 mg tablets. Following the count, it was  
10 discovered that the Omnicell inventory for the morphine was 141, while actual inventory was 121,  
11 and that the Omnicell inventory for the carisoprodol was 57, while actual inventory was 38.  
12 Camacho said that if the inventory of the Omnicell was found to be inaccurate, a technician would  
13 verify the count, and that a pharmacist would verify with the technician; however, Camacho did  
14 not know if the initials of the verifying pharmacist were recorded.

15 43. During Inspector D.P.'s meeting with Respondent Camacho on March 7, 2014, D.P.  
16 requested that Camacho immediately provide audits on the following controlled substances that  
17 were found in E.C.'s possession at the time of her arrest: meperidine, morphine (all oral  
18 strengths), oxycodone (all oral strengths), methadone (all oral strengths), amphetamine (all brands  
19 and oral strengths which contain this ingredient), hydromorphone (all), and carisoprodol. D.P.  
20 requested that Camacho complete the audits at all four of Adventist's pharmacy campuses. D.P.  
21 requested that the audits be provided to her by March 11, 2014. Camacho failed to provide D.P.  
22 with the requested documents by March 11, 2014.

23 44. On or about March 13, 2014, Inspector D.P. met with Respondent Camacho. During  
24 the meeting, D.P. instructed Camacho to immediately conduct an audit of all blank prescription  
25 pads for all four of Adventist's hospitals. D.P. requested from Camacho a statement on the blank  
26 prescription pad accountability and loss. On or about March 18, 2014, D.P. requested that  
27 Camacho's statement on the blank prescription pad accountability and loss for all four of  
28

1 Adventist's hospitals be provided by March 21, 2014. D.P. did not receive all requested  
2 documents by March 21, 2014.

3 45. On or about March 19, 2014, Inspector D.P. met with Respondent Camacho. D.P.  
4 requested statements from Camacho regarding the discrepancy timeline (when Camacho  
5 discovered the discrepancies in controlled substance inventory that were attributable to E.C.),  
6 security surveillance video observations of E.C.'s theft of controlled substances from Respondent  
7 Hanford, and the prescription pad accountability procedure at Respondent Hanford's pharmacy.  
8 D.P. also requested an audit showing a comparison of delivery receipt vs. perpetual inventory  
9 entry at Adventist's Hanford (Respondent Hanford) and Selma pharmacies. D.P. requested that  
10 all documents be provided to her by March 26, 2014. Camacho failed to provide the requested  
11 documents by March 26, 2014.

12 46. During Inspector D.P.'s investigation, she discovered that Respondent Hanford's  
13 pharmacy, located more than one mile from Kerr Outpatient Surgical Center (Kerr), had delivered  
14 controlled substance medications to a nursing station at Kerr. Delivery records were labeled  
15 "KOC Surgery," "KOC Recovery," "KOC GI Lab," or "KOC PACU." No DEA Form 222 was  
16 completed for the supplied Schedule II controlled substance medications. Respondent Hanford's  
17 pharmacy provided Kerr controlled substance medications and other bulk medications for an  
18 extensive time period, at least well before December 2010. The location to which these  
19 medications were furnished did not have a license to obtain, receive, or maintain the medication.  
20 The medications provided were not by patient-specific prescriptions. On and between December  
21 1, 2013 and May 30, 2014, the following quantities of controlled substance medications were  
22 delivered to Kerr:

<u>Medication</u>	<u>Total</u>
23 Acetaminophen with Cod. Elixir 120-12mg/5ml 5 ml size	5
24 Cocaine 4% solution 4 ml	39
25 Fentanyl 50 mcg/1ml 2 ml	450
26 Hydrocodone/APAP 5-325mg tabs	80
27 Hydrocodone/APAP 5-500mg tabs	10

1	Hydrocodone/APAP 10-325 mg tab	10
2	Hydrocodone/APAP 7.5-500mg Elixir 5 ml	20
3	Hydromorphone 2mg/1ml 1 ml carp	245
4	Ketamine 500mg/ml 10 ml vial	14
5	Meperidine 25mg/1ml 1ml syringe	229
6	Midazolam 5mg/ml 2ml inj	537
7	Morphine Sulfate 10mg/1ml 1ml syringe	10
8	Oxycodone-Acetaminophen 5-325mg tabs	50

9 47. On or about March 19, 2014, Inspector D.P. conducted an investigative inspection of  
10 Adventist's Central Valley General Hospital pharmacy. During this inspection, Respondent  
11 Camacho informed D.P. that she was not the pharmacist-in-charge of this location, however she  
12 used this location as her main office. Camacho stated that as the Pharmacy Director of all of  
13 Adventist's pharmacies, she could monitor the pharmacies via the computer webcams she had set  
14 up.

15 48. On or about April 29, 2014, Inspector D.P. received a copy of an e-mail that  
16 Respondent Camacho had sent to Adventist's pharmacy technician staff in June 2013. The e-mail  
17 stated that Camacho would take any employee found to be gossiping about co-workers to  
18 Adventist's human resources department "to discuss your future in our organization."

19 49. On or about June 11, 2014, Inspector D.P. interviewed B.E., the pharmacist-in-charge  
20 of Adventist's Central Valley General Hospital and staff pharmacist at Adventist's Medical  
21 Center Selma. B.E. stated that on or about February 21, 2014, he noticed there were odd  
22 quantities for some controlled substances signed out in the perpetual inventory logs at Adventist  
23 Medical Center Selma. B.E. said he ran a report of what was logged out to Omnicell compared to  
24 what was actually entered into Omnicell inventory, and discovered quite a number of  
25 discrepancies. B.E. composed a summarized list and e-mailed the audit to Respondent Camacho.  
26 B.E. also told Camacho about the suspicious entries in the perpetual inventory logs. Camacho  
27 told B.E. she had a suspicion on who could be involved.

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1 50. Respondent Camacho did not mention the February 21, 2014 audit, completed by  
2 B.E., during any of her earlier conversations with Inspector D.P.

3 51. On or about June 11 and 12, 2014, Inspector D.P. interviewed four pharmacists who  
4 worked at Respondent Hanford, including A.A-K. and J.T. A.A-K. told D.P. that a pharmacist  
5 was not scheduled inside the pharmacy from 7:30 a.m. to 11 a.m. daily. J.T. told D.P. that there  
6 was no pharmacist scheduled in the pharmacy from 6 a.m. to 9 a.m. daily.

7 52. On or about June 11 and 12, 2014, Inspector D.P. interviewed four pharmacy  
8 technicians that worked at Respondent Hanford, including B.J., T.T., and L.A. B.J., T.T., and  
9 L.A. all informed D.P. that they interpreted Respondent Camacho's June 2013 e-mail as  
10 pertaining to pharmacist E.C., and that their jobs would be in jeopardy if they said anything about  
11 E.C.

12 53. On or about June 12, 2014, Inspector D.P. interviewed Respondent Camacho, who  
13 stated that she did not encourage open communication among the pharmacy staff at Adventist if  
14 an employee had concerns for patient safety due to employee impairment.

15 54. At the conclusion of Inspector D.P.'s June 12, 2014 interview with Respondent  
16 Camacho, D.P. requested various documents from Camacho, including the audit of controlled  
17 substances that was prepared by B.E. D.P. informed Camacho that a response to her request was  
18 due by June 18, 2014. D.P. did not receive the requested documents by June 18, 2014.

19 55. During the course of Inspector D.P.'s investigation, D.P. requested the following  
20 documents from Respondent Camacho: (1) completed DEA 406 for Respondent Hanford's  
21 pharmacy within fourteen days to the Board; (2) complete and accurate records of the disposition  
22 of controlled substances to Kerr; and (3) accurate records of dispensing and controlled substance  
23 inventory. Camacho failed to provide any of these documents by the deadlines D.P. specified.

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1 **RESPONDENT HANFORD**

2 **FIRST CAUSE FOR DISCIPLINE**

3 **(Furnishing Dangerous Drugs and Controlled Substances Without Prescription, In Bulk, to**  
4 **Unlicensed Facilities)**

5 56. Respondent Hanford is subject to disciplinary action under sections 4029(b), 4059(a),  
6 4059.5(b), and 4060 in that Hanford provided controlled substances, in bulk, without patient  
7 prescriptions, to Kerr, which is not licensed by the Board. The circumstances are described with  
8 more particularity in paragraph 46.

9 **SECOND CAUSE FOR DISCIPLINE**

10 **(Failure to Directly Supervise Pharmacy Technicians)**

11 57. Respondent Hanford is subject to disciplinary action under California Code of  
12 Regulations, title 16, section 1793.7(b), and Health and Safety Code section 11207(a), in that no  
13 pharmacist was scheduled to work in the pharmacy for at least three consecutive hours daily,  
14 during which time pharmacy technicians pulled medication from the shelf, prepared and labeled  
15 medication, and access the controlled substance locker (which only pharmacy technicians had  
16 access to). The circumstances are described with more particularity in paragraphs 37-39, and 41.

17 **THIRD CAUSE FOR DISCIPLINE**

18 **(Lack of Security of Prescription Department)**

19 58. Respondent Hanford is subject to disciplinary action under California Code of  
20 Regulations, title 16, section 1714(b), in that Hanford's facilities, space, fixtures, and equipment  
21 were not maintained so that drugs were safely and properly maintained, secured, and distributed.  
22 The circumstances are as follows:

23 59. On or about March 14, 2014, an audit of acquisition and disposition records for the  
24 time period of June 28, 2011 through March 7, 2014, conducted at Respondent Hanford's  
25 pharmacy revealed a loss of the following controlled substances:

- 26 a. 10 tabs of Morphine Sulfate 30mg tablet  
27 b. 20ml of Hydromorphone 4mg/ml syringe  
28 c. 277 ml of Hydromorphone 2mg/ml syringe

- 1 d. 104ml of Morphine 4mg/ml Carpuject  
2 e. 352ml of Morphine 1mg/ml Vial P-F  
3 f. 100ml of Hydromorphone 2mg/ml Vial  
4 g. 100 of Oxycodone-APAP 7.5-325mg tab.

5 60. The controlled substance loss was found to be theft by licensed pharmacist E.C.

6 **FOURTH CAUSE FOR DISCIPLINE**

7 **(Failure to Report Controlled Substance Theft by a Licensed Pharmacy Employee)**

8 61. Respondent Hanford is subject to disciplinary action under section 4104(c) of the  
9 Code, and California Code of Regulations, title 16, section 1715.6, in that Hanford failed to  
10 provide to the Board, within fourteen days of receipt or development thereof, documentary  
11 evidence demonstrating theft, diversion, or self-use of dangerous drugs; and failed to report to the  
12 Board, within thirty days of discovery, a loss of controlled substances, including their amounts  
13 and strengths. The circumstances are described with more particularity in paragraphs 59-60 and  
14 as follows:

15 62. After discovery of the controlled substance loss described in paragraphs 59-60,  
16 Respondent Camacho, as the pharmacist-in-charge for Respondent Hanford, submitted a DEA  
17 106. The form was dated March 14, 2014 (indicating the date the theft was discovered), however  
18 it was not submitted to the Board until June 18, 2014.

19 **RESPONDENT CAMACHO**

20 **FIFTH CAUSE FOR DISCIPLINE**

21 **(Furnishing Dangerous Drugs and Controlled Substances Without Prescription, In  
22 Bulk, to Unlicensed Facilities)**

23 63. Respondent Camacho is subject to disciplinary action under sections 4029(b),  
24 4059(a), 4059.5(b), 4060, and 4113(c) of the Code, in that Camacho, as the pharmacist-in-charge  
25 of Respondent Hanford, provided or authorized the provision of controlled substances, in bulk,  
26 without a patient prescription, to Kerr, which is not licensed with the Board. The circumstances  
27 are described with more particularity in paragraph 46.

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**SIXTH CAUSE FOR DISCIPLINE**  
**(Lack of Security of Prescription Department)**

64. Respondent Camacho is subject to disciplinary action under California Code of Regulations, title 16, section 1714(d), and section 4113(c) of the Code, in that Camacho, as the pharmacist-in-charge for Respondent Hanford, failed to ensure that Hanford's facilities, space, fixtures, and equipment were maintained so that drugs were safely and properly maintained, secured, and distributed. The circumstances are as follows described with more particularity in paragraphs 58-60.

**SEVENTH CAUSE FOR DISCIPLINE**  
**(Failure to Report Controlled Substance Theft by a Licensed Pharmacy Employee)**

65. Respondent Camacho is subject to disciplinary action under sections 4104(c) and 4113(c) of the Code in that Camacho, as the pharmacist-in-charge of Respondent Hanford, failed to provide to the Board, within fourteen days of receipt or development thereof, documentary evidence demonstrating theft, diversion, or self-use of dangerous drugs; and failed to report to the Board, within thirty days of discovery, a loss of controlled substances, including their amounts and strengths. The circumstances are described with more particularity in paragraphs 59-62.

**EIGHTH CAUSE FOR DISCIPLINE**  
**(Failure to Directly Supervise Pharmacy Technicians)**

66. Respondent Camacho is subject to disciplinary action under California Code of Regulations, title 16, section 1793.7(b), Health and Safety Code section 11207(a), and section 4113(c) of the Code, in that as the pharmacist-in-charge at Respondent Hanford, Camacho failed to schedule a pharmacist to work in Hanford's pharmacy for at least three consecutive hours daily, during which time pharmacy technicians pulled medication from the shelf, prepared and labeled medication, and accessed the controlled substance locker (which only pharmacy technicians had access to) without pharmacist supervision on site. The circumstances are described with more particularity in paragraphs 37-39, and 41.

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1 **NINTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct—Gross Negligence)**

3 67. Respondent Camacho is subject to disciplinary action under section 4301(c) of the  
4 Code in that as the pharmacist-in-charge of Respondent Hanford, Camacho failed to:  
5 (1) investigate discrepancies in a December 21, 2013 DEA Biennial Inventory, which allowed an  
6 environment conducive to theft of controlled substances to exist; (2) provide an environment at  
7 Adventist where concerns regarding patient safety could be voiced and investigated; and (3)  
8 investigate employee impairment, which allowed theft of controlled substances to go undetected.  
9 The circumstances are described with more particularity in paragraphs 36, 40-42, and 52-53.

10 **TENTH CAUSE FOR DISCIPLINE**

11 **(Unprofessional Conduct—Gross Negligence)**

12 68. Respondent Camacho is subject to disciplinary action under section 4301(c) of the  
13 Code in that Camacho failed to provide for accountability of controlled substances at Adventist,  
14 which allowed an environment for theft of controlled substances to exist over a time period of  
15 several years. The circumstances are as follows:

16 69. Pharmacist E.C. diverted a large amount of controlled substances from Respondent  
17 Hanford's pharmacy. The controlled substance diversion dated back to 2012, as evidenced from  
18 the discovery of year-2012 supplier invoices for Adventist's Central Valley General Hospital  
19 pharmacy signed as received by E.C. but not entered into pharmacy inventory.

20 70. Respondent Camacho, as the Director of Pharmacy for Adventist, was responsible for  
21 scheduling all pharmacy staff at all four of Adventist's pharmacy locations.

22 71. Respondent Camacho's primary workplace was Adventist's Central Valley General  
23 Hospital pharmacy.

24 72. Respondent Camacho neglected to monitor controlled substance usage at Adventist's  
25 Central Valley General Hospital as evidenced by the receipt of 1,035 tablets of methadone 10mg  
26 tablets compared to 130 documented as dispensed (from July 7, 2011 through March 8, 2014),  
27 and receipt of 1,057 hydromorphone 2mg tablets compared to 150 documented as dispensed  
28 (from July 7, 2011 through March 8, 2014).

1 **ELEVENTH CAUSE FOR DISCIPLINE**

2 **(Engaging in Conduct That Subverts an Investigation of the Board)**

3 73. Respondent Camacho is subject to disciplinary action under section 4301(q) of the  
4 Code in that she engaged in conduct that subverted or attempted to subvert an investigation of the  
5 Board by failing to provide the following documents that were requested during the Board's  
6 investigation: (1) documentary evidence of Camacho's knowledge of the loss of controlled  
7 substances; (2) completed statements; (3) accurate controlled substance audits in the requested  
8 timeline; (4) accurate details of the discovery of the loss of controlled substances; (5) an audit of  
9 the prescription blanks at Adventist Medical Center Selma; and (6) an audit of supplier controlled  
10 substance invoices received by E.C. at Respondent Hanford's pharmacy compared to the  
11 controlled substances entered into inventory. The circumstances are described with more  
12 particularity in paragraphs 43-45, 54-55, and as follows:

13 74. During each of Inspector D.P.'s interviews and meetings with Respondent Camacho,  
14 Camacho's description regarding the discovery of the loss of controlled substances at Adventist  
15 changed as follows:

16 a. During Inspector D.P.'s first meeting with Respondent Camacho on March 7,  
17 2014, Camacho stated that she had just been informed of some controlled substance  
18 discrepancies. Camacho said she had discovered discrepancies in tramadol inventory for  
19 Adventist's Selma campus, as well as questionable deductions from the perpetual inventory at  
20 Adventist's Central Valley General Hospital for methadone. Camacho stated that she suspected  
21 Adventist pharmacist E.C. of the theft. Camacho stated that after reviewing the records at  
22 Adventist's Selma campus, she asked a security officer to review video surveillance, and the  
23 security officer showed her video from the Selma campus, dated February 19, 2014, showing E.C.  
24 entering the pharmacy after it was closed, taking medication, and placing the medication in her  
25 bag.

26 b. On March 11, 2014, Respondent Camacho provided Inspector D.P. with a  
27 statement, signed under penalty of perjury, stating that on February 21, 2014, Camacho contacted  
28 R.L., the Manager of Adventist's Security Department, and told him she believed there was a

1 possible drug diversion problem at Adventist's Selma campus. Respondent Camacho told R.L.  
2 that she believed the pharmacist involved in the theft was E.C. On February 28, 2014, R.L.  
3 reviewed the security video for February 19, 2014, which showed E.C. entering the pharmacy  
4 after it was closed with a large bag and making entries in binders on top of the narcotic cabinet.  
5 R.L. advised Camacho of his findings. On March 7, 2014, R.L. received a request from Camacho  
6 to review video at Adventist's Central Valley General Hospital for February 25, 2014.

7 c. On June 12, 2014, Inspector D.P. interviewed Respondent Camacho. During  
8 this interview, Camacho stated that when she told pharmacist B.E. that she had a suspicion of  
9 who was causing the controlled substance discrepancies, when B.E. provided her with a  
10 controlled substance audit showing discrepancies on February 21, 2014, she said that she did not  
11 know who it was. Camacho said that as of February 21, 2014, her suspicion was that a pharmacy  
12 technician was responsible for the controlled substance discrepancies.

#### 13 TWELFTH CAUSE FOR DISCIPLINE

##### 14 (Failure to Produce Required Records)

15 75. Respondent Camacho is subject to disciplinary action under section 4332 of the Code,  
16 by and through section 4081 of the Code, in that Camacho failed to provide the following  
17 documents as requested for the Board's investigation: (1) documentary evidence of her  
18 knowledge of loss of controlled substances; (2) completed statements within the timeframe  
19 requested by Inspector D.P.; (3) accurate controlled substance audits in the requested timeframe;  
20 (4) accurate details of the discovery of the loss of controlled substances; (5) an audit of  
21 prescription blanks at Adventist's Medical Center Selma; (6) an audit of supplier controlled  
22 substance invoices received by E.C. at Adventist's Hanford (Respondent Hanford) and Medical  
23 Center Selma pharmacies compared to controlled substances entered into inventory; (7)  
24 completed DEA 106 for Adventist's Hanford (Respondent Hanford) and Medical Center Selma  
25 pharmacies within fourteen days to the Board; (8) complete and accurate records of the  
26 disposition of controlled substances to Kerr; and (9) accurate records of dispensing and controlled  
27 substance inventory. The circumstances are described with more particularity in paragraphs 43-  
28 45 and 54-55.

1 **THIRTEENTH CAUSE FOR DISCIPLINE**

2 **(Failure to Report Dispensing Information of Controlled Substances to the Department of**  
3 **Justice)**

4 76. Respondent Camacho is subject to disciplinary action under section 4068(a)(4) of the  
5 Code, by and through California Health Safety Code section 11165, in that Respondent Camacho,  
6 as the Director of Pharmacy for Adventist, allowed Adventist's Reedley pharmacy to dispense  
7 controlled substances to emergency room patients without retaining the dispensing information.  
8 The circumstances are as follows:

9 77. On or about October 23, 2012, Inspector D.P. inspected Adventist's Medical Center,  
10 Reedley, and discovered that outpatient dispensing of controlled substances occurred from the  
11 hospital after the hospital pharmacy was closed for the day. After the inspection, D.P. informed  
12 Respondent Camacho and pharmacist-in-charge R.W. of the pharmacy law requirements for  
13 outpatient controlled substance medication dispensing from the emergency room. Camacho and  
14 R.W. told D.P. emergency room controlled substance medication dispensing would cease at that  
15 time.

16 78. On or about April 28, 2014, Inspector D.P. re-inspected Adventist Medical Center,  
17 Reedley's pharmacy. This re-inspection revealed that outpatient emergency room controlled  
18 substance medication dispensing continued to occur from October 23, 2012 through April 28,  
19 2014. A one-year accounting of outpatient controlled substance dispensing information showed  
20 1,045 prescriptions were dispensed. Adventist Medical Center Pharmacy Reedley did not report  
21 the dispensing information of controlled substance medication as required to the Department of  
22 Justice.

23 **FOURTEENTH CAUSE FOR DISCIPLINE**

24 **(Lack of Security of Prescription Department) (Respondent Hanford's Location)**

25 79. Respondent Camacho is subject to disciplinary action under California Code of  
26 Regulations, title 16, section 1714(d), in that an audit of controlled substances revealed a  
27 substantial loss of controlled substances, as well as that E.C. had the ability to steal controlled  
28 substances. The circumstances are as follows:

1 80. On or about March 14, 2014, an audit of acquisition and disposition records for the  
2 time period of June 18, 2011 through March 7, 2014, conducted at Adventist's Central Valley  
3 General Hospital's pharmacy revealed a loss of the following controlled substances:

- 4 a. 200 tabs of Carisoprodol 350mg
- 5 b. 127 tabs of Carisoprodol 350mg
- 6 c. 899 tablets of Hydromorphone 2mg
- 7 d. 21 vials of Hydromorphone PCA (.2mg/ml)
- 8 e. 497 tablets of Meperidine 50mg
- 9 f. 346ml of Meperidine 50mg/ml (as Demerol 50mg/ml)
- 10 g. 13ml of Meperidine 10mg/ml cartridge
- 11 h. 77ml of Meperidine 100mg/ml (as Demerol 100mg/ml) syringe
- 12 i. 905 tablets of Methadone HCL 10mg
- 13 j. 17 vials of Morphine PCA (1mg/ml)
- 14 k. 186 tablets of Oxycodone IR 5mg
- 15 l. 400 tablets of Oxycodone HCL 5mg
- 16 m. 191 tablets of Oxycodone-APAP 5-325
- 17 n. 200 tablets of Oxycodone APAP 5-325
- 18 o. 600 tablets of Oxycodone-APAP 5-325 (as Percocet 5-325mg)

19 81. The controlled substance theft was found to be theft by pharmacist and Adventist  
20 employee E.C.:

21 **FIFTEENTH CAUSE FOR DISCIPLINE**

22 **(Failure to Report Controlled Substance Theft by a Licensed Pharmacy Employee)**

23 82. Respondent Camacho is subject to disciplinary action under section 4104(c) of the  
24 Code in that Camacho failed to report and provide to the Board within fourteen days of receipt or  
25 development thereof, any documentary evidence demonstrating theft, diversion, or self-use of  
26 dangerous drugs. The circumstances are described with more particularity in paragraphs 79-82  
27 and as follows:

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1 83. After discovery of the controlled substance loss described in paragraphs 80-81,  
2 Respondent Camacho, as the Director of Pharmacy for Adventist, submitted a DEA 106. The  
3 form was dated March 14, 2014 (indicating the date the theft was discovered), however it was not  
4 received by the Board until June 18, 2014.

5 **SIXTEENTH CAUSE FOR DISCIPLINE**

6 **(Lack of Security of Prescription Department) (Adventist's Selma Location)**

7 84. Respondent Camacho is subject to disciplinary action under California Code of  
8 Regulations, title 16, section 1714(d), by and through section 4113(o) of the Code, in that an audit  
9 of controlled substances revealed a substantial loss of controlled substances. The circumstances  
10 are as follows:

11 85. On or about March 14, 2014, an audit of acquisition and disposition records for June  
12 28, 2011 through March 7, 2014, conducted at Adventist's Medical Center-Selma revealed a loss  
13 of the following controlled substances:

- |    |    |  |
|----|----|--|
| 14 | a. | 263 tabs of Carisoprodol 350mg                   |
| 15 | b. | 609 of Hydrocodone/APAP 10-325                   |
| 16 | c. | 1,163 of Hydrocodone-APAP 10-325                 |
| 17 | d. | 81 of Hydromorphone 2mg/ml                       |
| 18 | e. | 33 of Hydromorphone 4mg/ml                       |
| 19 | f. | 1,496 tablets of Hydromorphone 2mg               |
| 20 | g. | 50 of Hydromorphone 10mg/ml vial                 |
| 21 | h. | 850 tablets of Meperidine 50mg                   |
| 22 | i. | 346ml of Meperidine 50mg/ml (as Demerol 50mg/ml) |
| 23 | j. | 1,363 tablets of Methadone HCL 10mg              |
| 24 | k. | 1,000ml of Methadone 1mg/ml                      |
| 25 | l. | 140 of Morphine Sulfate 30mg SA                  |
| 26 | m. | 50 of Morphine Sulfate ER 30mg ER                |
| 27 | n. | 9ml of Morphine 20mg/ml                          |
| 28 | o. | 48ml of Morphine 4mg/ml                          |

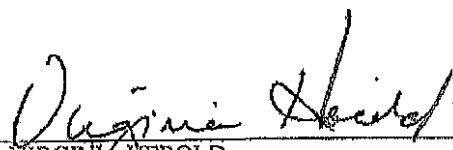
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- p. 767 tablets of Oxycodone IR 5mg
- q. 1,000 tablets of Oxycodone HCL 5mg
- r. 26 of Oxycodone ER 10mg (as Oxycontin 10mg)
- s. 20 of Oxycodone ER 20mg (as Oxycontin 20mg)
- t. 290 of Oxycodone ER 80mg (as Oxycontin 80mg)
- u. 191 tablets of Oxycodone-APAP 5-325
- v. 1,163 tablets of Oxycodone-APAP 5-325

**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 Hospital Pharmacy License Number HSP 30446, issued to Hanford Community Hospital dba Adventist Medical Center;~~
- 2. Revoking or suspending Original Pharmacist License Number RPH 41441, issued to Deborah Ann Camacho;
- 3. Ordering Hanford Community Hospital and Deborah Ann Camacho 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; and
- 4. Taking such other and further action as deemed necessary and proper.

DATED: 10/20/15 

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

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