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7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. 4361

12 **CHARLIE GUZMAN**
1650 Sunflower Ave
13 Glendora, CA 91740

A C C U S A T I O N

14 Pharmacy Technician Registration
15 No. TCH 115741

16 Respondent.

17 Complainant alleges:

18 **PARTIES**

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

21 2. On or about October 26, 2011, the Board of Pharmacy (Board) issued Pharmacy
22 Technician Registration No. TCH 115741 to Charlie Guzman (Respondent). The Pharmacy
23 Technician Registration was in full force and effect at all times relevant to the charges brought
24 herein and will expire on December 31, 2012, unless renewed.

25 **JURISDICTION**

26 3. This Accusation is brought before the Board under the authority of the following
27 laws. All section references are to the Business and Professions Code unless otherwise indicated.

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1 act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
2 case.

3 **CAUSE FOR DISCIPLINE**

4 **(Conviction of a Substantially Related Crime)**

5 10. Respondent is subject to disciplinary action under section 4301, subdivision (l) and
6 490, in conjunction with California Code of Regulations, title 16, section 1770, in that
7 Respondent was convicted of a crime substantially related to the qualifications, functions, and
8 duties of a pharmacy technician. On or about April 13, 2012, after pleading nolo contendere,
9 Respondent, was convicted of one felony count of violating Penal Code section 192, subdivision
10 (c)(1) [vehicular manslaughter with gross negligence] and five misdemeanor counts of Vehicle
11 Code section 23104, subdivision (a) [reckless driving with bodily injury] in the criminal
12 proceeding entitled *The People of the State of California v. Charlie Guzman* (Super. Ct. Los
13 Angeles County, 2012, No. KA097171.) The Court sentenced Respondent to serve 2 years in
14 State Prison as to count one and 150 days in Los Angeles County Jail as to counts 2 through 6,
15 probation was denied. The circumstances surrounding the conviction are that on or about April
16 28, 2011, during an investigation of a traffic collision, by the California Highway Patrol,
17 Respondent was contacted. Respondent travelled at an unsafe speed, failed to maintain his car
18 within his lane, making an unsafe lane change, and collided into another vehicle causing it to hit
19 the center divider and overturn several times. Passengers were transported to the hospital for
20 treatment. One of the passengers was transported to Foothill Presbyterian Hospital where she was
21 pronounced deceased.

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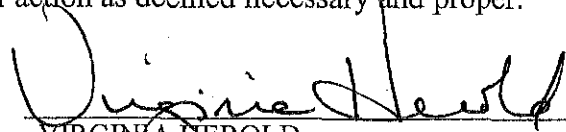
PRAYER

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

1. Revoking or suspending Pharmacy Technician Registration No. TCH 115741, issued to Respondent;
2. Ordering Charlie Guzman to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to section 125.3; and
3. Taking such other and further action as deemed necessary and proper.

DATED: _____

1/24/13



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

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