

1 KAMALA D. HARRIS
Attorney General of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 GILLIAN E. FRIEDMAN
Deputy Attorney General
4 State Bar No. 169207
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2564
6 Facsimile: (213) 897-2804

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

11 In the Matter of the Accusation Against:

Case No. 4558

12 **LILIAN GRISSEL FLORES**
28019 Roblin Avenue
13 Santa Clarita, CA 91350

A C C U S A T I O N

14 Pharmacy Technician Registration
15 No. TCH 87080

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

- 20 1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity
21 as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs (Board).
22 2. On or about January 16, 2009, the Board issued Pharmacy Technician Registration
23 No. TCH 87080 to Lilian Grissel Flores (Respondent). The Pharmacy Technician Registration
24 expired on January 31, 2013, and has not been 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 8. Section 4301 states:

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

5

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

8 **COST RECOVERY**

9 9. Section 125.3 provides that the Board may request the administrative law judge to
10 direct a licentiate found to have committed a violation or violations of the licensing act to pay a
11 sum not to exceed the reasonable costs of the investigation and enforcement of the case.

12 **CONTROLLED SUBSTANCE / DANGEROUS DRUG**

13 10. Methamphetamine is a Schedule II controlled substance as designated by Health and
14 Safety Code section 11055, subdivision (d)(2), and is categorized as a dangerous drug pursuant to
15 section 4022.

16 **CAUSE FOR DISCIPLINE**

17 **(Possession of a Controlled Substance - Methamphetamine)**

18 11. Respondent is subject to disciplinary action under sections 4060, 4300, 4301,
19 subdivision (j), on the grounds of unprofessional conduct, in that on or about July 22, 2012,
20 Respondent was in possession of a tested 0.15 grams of methamphetamine, without a valid
21 prescription.

22 **PRAYER**

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

25 1. Revoking or suspending Pharmacy Technician Registration No. TCH 87080, issued
26 to Lilian Grissel Flores;

27 2. Ordering Lilian Grissel Flores to pay the Board the reasonable costs of the
28 investigation and enforcement of this case, pursuant to section 125.3; and

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3. Taking such other and further action as deemed necessary and proper.

DATED: 9/6/13 

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

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