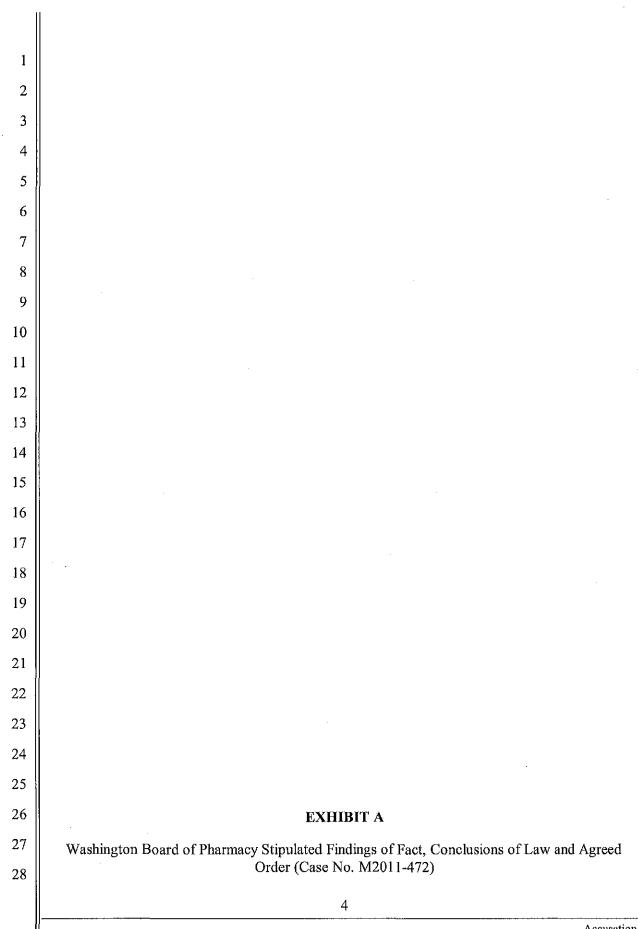
1 2 3 4 5 6 7 8 9	BOARD OF	RE THE PHARMACY	
10		CONSUMER AFFAIRS CALIFORNIA	
11			
12	In the Matter of the Accusation Against:	Case No. 4809	
13	LOUIS CHUN-HONG WONG, 14925 SE 60 <sup>th</sup> Street		
14	Bellvue, WA 98006	ACCUSATION	
15	Pharmacist License No. RPH 41176		
16	Respondent.		
17		•	
18	Virginia Herold ("Complainant)" alleges:		
19		TIES	
20	1. Complainant brings this Accusation s	solely in her official capacity as the Executive	
21	Officer of the Board of Pharmacy, Department o		
22	2. On or about September 26, 1987, the	e Board of Pharmacy issued Pharmacist License	
23	Number RPH 41176 to Louis Chun-Hong Wong	("Respondent"). The Pharmacist License is	
24	inactive, and will expire on October 31, 2014, un	less renewed.	
25	JURISE	DICTION	
26	3. This Accusation is brought before th	e Board of Pharmacy ("Board"), Department of	
27	Consumer Affairs, under the authority of the following laws. All section references are to the		
28	Business and Professions Code unless otherwise indicated.		
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		Accusation	

1	4. Code Section 4300 states, in pertinent part, that every license issued may be	
2	suspended or revoked.	
3	5. Section 4300.1 of the Code states:	
4	"The expiration, cancellation, forfeiture, or suspension of a board-issued license by operation	
5	of law or by order or decision of the board or a court of law, the placement of a license on a	ļ
6	retired status, or the voluntary surrender of a license by a licensee shall not deprive the board of	
7	jurisdiction to commence or proceed with any investigation of, or action or disciplinary proceeding	
8	against, the licensee or to render a decision suspending or revoking the license."	
9	STATUTORY PROVISIONS	
10	6. Code Section 4301 states, in pertinent part:	
11	The board shall take action against any holder of a license who is guilty of unprofessional	
12	conduct or whose license has been procured by fraud or misrepresentation or issued by mistake.	
13	Unprofessional conduct shall include, but is not limited to, any of the following:	
14	•••	
15	"(n) The revocation, suspension, or other discipline by another state of a license to practice	
16	pharmacy, operate a pharmacy, or do any other act for which a license is required by this chapter."	ļ
17	COST RECOVERY	
18	7. Section 125.3 of the Code states, in pertinent part, that the Board may request the	
19	administrative law judge to direct a licentiate found to have committed a violation or violations of	
20	the licensing act to pay a sum not to exceed the reasonable costs of the investigation and	
21	enforcement of the case.	
22	CAUSE FOR DISCIPLINE	
23	(Disciplinary Action by the Washington Board of Pharmacy)	
24	8. Respondent is subject to discipline Under Code section 4301, subdivision (n), on the	
25	grounds of unprofessional conduct, in that Respondent was disciplined by the Washington Board	
26	of Pharmacy as follows: On or about October 20, 2011, by Stipulated Findings of Fact,	
27	Conclusions of Law and Agreed Order, Respondent was found to be in violation of Washington	
28	Board of Pharmacy law for unprofessional conduct for writing prescriptions for himself and family	
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Accusation

1	members using a physician's name as the prescriber, without the physician's authorization.	
2	Respondent's Washington Pharmacist License was placed on probation for three years, subject to	
3	terms including payment of \$7,000, passage of the MPJE examination within 15 months, and	
4	completion of 18 hours of continuing education in the area of pharmacy law and/or ethics. A true	
5	and correct copy of the Stipulated Findings of Fact, Conclusions of Law and Agreed Order is	
6	attached as exhibit A and incorporated herein.	
7	PRAYER	
8	WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,	
9	and that following the hearing, the Board of Pharmacy issue a decision:	
10	1. Revoking or suspending Pharmacist License Number RPH 41176, issued to Louis	
11	Chun-Hong Wong	
12	2. Ordering Louis Chun-Hong Wong to pay the Board of Pharmacy the reasonable costs	
13	of the investigation and enforcement of this case, pursuant to Business and Professions Code	
14	section 125.3;	
15	3. Taking such other and further action as deemed necessary and proper.	
16		
17		
18	DATED: 9/6/3 Uniona Dente	
19	VIRGINIA HEROLD Executive Officer	
20	Board of Pharmacy Department of Consumer Affairs	
21	State of California Complainant	
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