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

12 In the Matter of the Accusation Against:

Case No. 4809

13 **LOUIS CHUN-HONG WONG,**
14 14925 SE 60th Street
Bellvue, WA 98006

A C C U S A T I O N

15 **Pharmacist License No. RPH 41176**

16 Respondent.

17
18 Virginia Herold ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the Executive
21 Officer of the Board of Pharmacy, Department of Consumer Affairs.

22 2. On or about September 26, 1987, the 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, unless renewed.

25 **JURISDICTION**

26 3. This Accusation is brought before the Board of Pharmacy ("Board"), Department of
27 Consumer Affairs, under the authority of the following laws. All section references are to the
28 Business and Professions Code unless otherwise indicated.

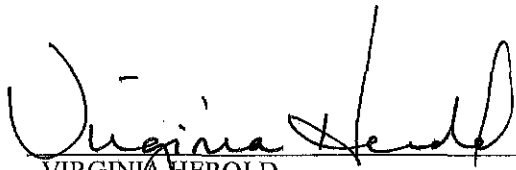
1 members using a physician's name as the prescriber, without the physician's authorization.
2 Respondent's Washington Pharmacist License was placed on probation for three years, subject to
3 terms including payment of \$7,000, passage of the MPJE examination within 15 months, and
4 completion of 18 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: 9/6/13


19 VIRGINIA HEROLD
20 Executive Officer
21 Board of Pharmacy
22 Department of Consumer Affairs
23 State of California
24 Complainant

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EXHIBIT A

Washington Board of Pharmacy Stipulated Findings of Fact, Conclusions of Law and Agreed Order (Case No. M2011-472)