

1 KAMALA D. HARRIS  
Attorney General of California  
2 FRANK H. PACOE  
Supervising Deputy Attorney General  
3 LESLIE E. BRAST  
Deputy Attorney General  
4 State Bar No. 203296  
455 Golden Gate Avenue, Suite 11000  
5 San Francisco, CA 94102-7004  
Telephone: (415) 703-5548  
6 Facsimile: (415) 703-5480  
*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**BOARD OF PHARMACY**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10  
11 In the Matter of the Accusation Against:

Case No. 4871

12 **JOHN H. REESE**  
17990 Hillwood Lane  
13 Morgan Hill, CA 95037

**A C C U S A T I O N**

14 **Pharmacy Technician Registration No. TCH 79305**

15 Respondent.

16  
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 (Board), Department of Consumer Affairs.

21 2. On or about November 2, 2007, the Board issued Pharmacy Technician Registration  
22 Number TCH 79305 to John H. Reese (Respondent). The Pharmacy Technician Registration was  
23 in full force and effect at all times relevant to the charges brought herein and will expire on  
24 September 30, 2015, 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 (Code) unless otherwise  
28 indicated.







1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**FOURTH CAUSE FOR DISCIPLINE**

**(Furnishing a Dangerous Drug/Controlled Substance)**

21. Respondent is subject to discipline under Code sections 4301(j), 4301(o), 4059, and/or Health and Safety Code section 11170, in that Respondent furnished to himself or another without a valid prescription, and/or conspired to furnish, and/or assisted or abetted furnishing of, a dangerous drug and/or a controlled substance, as described in paragraph 17, above.

**FIFTH CAUSE FOR DISCIPLINE**

**(Unprofessional Conduct)**

22. Respondent is subject to discipline under section 4301 for unprofessional conduct as described in paragraph 17, above.

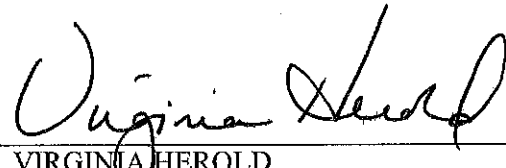
**PRAYER**

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 Pharmacy Technician Registration Number TCH 79305, issued to John H. Reese;
2. Ordering John H. Reese 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;
3. Taking such other and further action as deemed necessary and proper.

DATED: \_\_\_\_\_

9/13/14



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

SF2013405543  
41034366.doc