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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. 5249

12 **KAREN ELLEN FOWLER**
13 **4301 1/2 Edenhurst Ave.**
Los Angeles, CA 90039

ACCUSATION

14 **Pharmacy Technician Registration No. TCH**
15 **132244**

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.

22 2. On or about May 16, 2013, the Board of Pharmacy issued Pharmacy Technician
23 Registration Number TCH 132244 to Karen Ellen Fowler (Respondent). The Pharmacy
24 Technician Registration expired on May 31, 2015, and has not been 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 case settles, recovery of investigation and enforcement costs may be included in a stipulated
2 settlement.

3 **CAUSE FOR DISCIPLINE**

4 **(Convictions of a Substantially Related Crimes)**

5 9. Respondent is subject to disciplinary action under sections 4300 and 4301,
6 subdivision (I), in conjunction with California Code of Regulations, title 16, section 1770, on the
7 grounds of unprofessional conduct, in that Respondent committed substantially related crimes, as
8 follows:

9 a. On or about March 11, 2016, after pleading nolo contendere, Respondent was
10 convicted of violating Penal Code section 422(a) (making terrorist threats causing fear) in the
11 criminal proceeding entitled *The People of the State of California v. Karen Ellen Fowler* (Super.
12 Ct. Los Angeles County, Los Angeles, No. BA434482). The Court sentenced Respondent to four
13 years in any state prison, suspended sentence, 734 days in Los Angeles County Jail, and three
14 years' probation, and served her with a protective order.

15 b. The circumstances underlying the conviction are that on or about March 11, 2015,
16 Los Angeles Police Department responded to a call regarding a violent female with a mental
17 illness. A neighbor of Respondent was driving into his driveway when Respondent approached
18 him holding a large knife in her hand. Respondent had the knife pointed at him and yelled that she
19 was going to kill him. There was a passenger in the neighbor's car who confirmed that
20 Respondent made verbal and physical threats.

21 c. On or about January 2, 2014, after pleading nolo contendere, Respondent was
22 convicted of one misdemeanor count of violating Penal Code section 422(a) (making terrorist
23 threats causing fear) in the criminal proceeding entitled *People v. Karen Ellen Fowler* (Super. Ct.
24 Los Angeles County, 2014, No. 4GN00003). The Court sentenced her to eight days in jail, three
25 years' probation, ordered her to complete six months of psychiatric counseling, and served her
26 with a protective order.

27 d. The circumstances underlying the conviction are that on or about December 30, 2013,
28 officers of the Glendale Police Department responded to a call from a Bank of America employee

1 who stated that Respondent had tried to take a bank security officer's gun and threatened him.
2 When the officers arrived, they found Respondent fulminating about imagined threats: she
3 imagined there was an imminent nuclear attack, that others were trying to kill her, and that the
4 devil had made her kill one of her cats. She also had scratches and bruising on her arms
5 consistent with cat scratches. She and others confirmed that she also had threatened to kill the
6 bank security guard and repeatedly tried to take his gun.

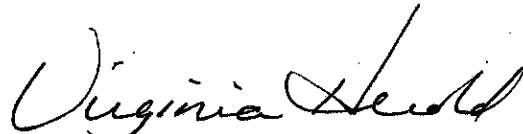
7 **PRAYER**

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 Pharmacy Technician Registration Number TCH 132244,
11 issued to Karen Ellen Fowler;
- 12 2. Ordering Karen Ellen Fowler to pay the Board of Pharmacy the reasonable costs of
13 the investigation and enforcement of this case, pursuant to Business and Professions Code section
14 125.3; and,
- 15 3. Taking such other and further action as deemed necessary and proper.

16
17
18 DATED: _____

10/6/17



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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