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7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

Case No. 6169

13 **JAMIE LYNNE PALMER**
365 Avenida de Los Arboles, #138
Thousand Oaks, CA 91360

A C C U S A T I O N

14 Pharmacy Technician Registration
15 No. TCH 23577

16 Respondent.

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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 August 6, 1997, the Board issued Pharmacy Technician Registration No.
23 TCH 23577 to Jamie Lynne Palmer (Respondent). The Pharmacy Technician Registration was in
24 full force and effect at all times relevant to the charges brought herein and will expire on
25 November 30, 2018, unless renewed.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board under the authority of the following
28 laws. All section references are to the Business and Professions Code unless otherwise indicated.

1 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
2 included in a stipulated settlement.

3 9. **CONTROLLED SUBSTANCE/DANGEROUS DRUG**

4 "Methamphetamine," is a Schedule II controlled substance as designated by Health and
5 Safety Code section 11055, subdivision (d)(2), and is categorized as a dangerous drug pursuant to
6 Business and Professions Code section 4022.

7 **FIRST CAUSE FOR DISCIPLINE**

8 **(Use of a Controlled Substance)**

9 10. Respondent is subject to disciplinary action under section 4301, subdivision (h), in
10 that Respondent used methamphetamine, a controlled substance as follows:

11 a. On or about June 3, 2016, when contacted by Ventura County Sheriff deputies,
12 Respondent was observed to be sweating profusely, her pupils were dilated, her lips were burnt
13 and chapped, and she was extremely talkative and fidgety. The deputy conducted a Drug Abuse
14 Recognition exam and concluded that Respondent was under the influence of a controlled
15 substance. She was subsequently arrested for violating Health and Safety Code section 11550,
16 subdivision (a) [under the influence of a controlled substance]. During the booking procedure,
17 Respondent provided a urine sample that tested positive for methamphetamine. Respondent
18 denied using methamphetamine and claimed the test was positive because she takes Adderall.

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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 23577, issued to Jamie Lynne Palmer
2. Ordering Jamie Lynne Palmer 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; and,
3. Taking such other and further action as deemed necessary and proper.

DATED: _____

9/22/17

Virginia Herold

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

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