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7 Attorneys for Complainant  
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9  
10 **BEFORE THE**  
**BOARD OF PHARMACY**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation/Petition to  
Revoke Probation Against:

13 CHRISTIANA ANN ROACH, R.P.H.  
14 10380 Maya Linda Road #C206  
San Diego, CA 92126

15 and

16 6035 W. Berenice Avenue  
17 Chicago, IL 60634-2540

18 Pharmacist License No. RPH 49859

19 Respondent.  
20

Case No. 2957

OAH No. L-2004110082

**DEFAULT DECISION  
AND ORDER**

[Gov. Code, §11520]

21 FINDINGS OF FACT

22 1. On or about April 24, 2006, Complainant Patricia F. Harris, in her official  
23 capacity as the Executive Officer of the Board of Pharmacy ("Board"), filed Accusation and  
24 Petition to Revoke Probation No. 2957 against CHRISTIANA ANN ROACH, R.P.H.  
25 ("Respondent") before the Board of Pharmacy.

26 2. On or about September 15, 1997, the Board of Pharmacy ("Board") issued  
27 Pharmacist License No. RPH 49859 to Respondent. The license expires on April 30, 2007,  
28 unless renewed.

1                   3.       On or about May 3, 2006, Mona Sebastian, an employee of the  
2 Department of Justice, served by Certified and First Class Mail a copy of Accusation and Petition  
3 to Revoke Probation No. 2957, Statement to Respondent, Notice of Defense, Request for  
4 Discovery, and Government Code sections 11507.5, 11507.6, and 11507.7 to Respondent's  
5 address of record with the Board, which was and is 10380 Maya Linda Road #C206, San Diego,  
6 CA. A copy of the Accusation and Petition to Revoke Probation, the related documents, and  
7 Declaration of Service are attached as Exhibit "A," and are incorporated herein by reference.

8                   4.       Service of the Accusation and Petition to Revoke Probation was effective  
9 as a matter of law under the provisions of Government Code section 11505, subdivision (c).

10                  5.       On or about May 31, 2006, the Accusation packet sent by Certified Mail  
11 was returned by the U.S. Postal Service marked "Unclaimed." A copy of the postal returned  
12 documents are attached hereto as Exhibit "B," and are incorporated herein by reference. A new  
13 address for Ms. Roach of 6035 W. Berenice Avenue, Chicago, IL 60634-2540 was noted on the  
14 envelope.

15                  6.       On or about June 8, 2006, the Accusation packet was sent by Certified and  
16 First Class Mail to Ms. Roach at the address noted by the U.S. Postal Service, namely 6035 W.  
17 Berenice Avenue, Chicago, IL 60634-2540.

18                  7.       On or about June 19, 2006, the Accusation packet mailed first class was  
19 returned by the U.S. Postal Service with a handwritten notation "Return to Sender." A copy of  
20 the returned envelope is attached as Exhibit "C," and incorporated herein by reference.

21                  8.       On or about July 3, 2006, the Accusation packet mailed by Certified Mail  
22 was returned by the U.S. Postal Service marked "Unclaimed." A copy of the returned envelope  
23 is attached as Exhibit "D," and incorporated herein by reference.

24                  9.       Government Code section 11506 states, in pertinent part:

25                       "(c) The respondent shall be entitled to a hearing on the merits if the respondent  
26 files a notice of defense, and the notice shall be deemed a specific denial of all parts of the  
27 accusation not expressly admitted. Failure to file a notice of defense shall constitute a waiver of  
28 respondent's right to a hearing, but the agency in its discretion may nevertheless grant a hearing."



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c. California Code of Regulations, Title 16, Section 1773 - failure to participate in random drug screening while on probation; and

d. California Code of Regulations, Title 16, Section 1773 - failure to abstain from drug use while on probation.

ORDER

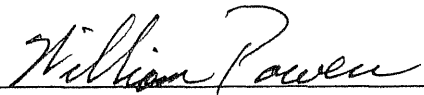
IT IS SO ORDERED that Pharmacist License No. RPH 49859, heretofore issued to Respondent CHRISTIANA ANN ROACH, R.P.H., is revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on November 15, 2006.

It is so ORDERED October 16, 2006.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

By   
WILLIAM POWERS  
Board President

80084594.wpd  
DOJ docket number:SD2005800390

Attachments:

- Exhibit A: Accusation and Petition to Revoke Probation No.2957, Related Documents, and Declaration of Service
- Exhibit B: Postal Return Documents (May 31, 2006 Service)
- Exhibit C: Postal Return Documents (June 19, 2006 Service - 1<sup>st</sup> Class)
- Exhibit D: Postal Return Documents (June 19, 2006 Service - Certified Mail)

Exhibit A

Accusation/Petition to Revoke Probation No. 2957,  
Related Documents and Declaration of Service

# ERRATA

## Corrections to Exhibit A Accusation/Petition to Revoke Probation No. 2957

Exhibit A, the Accusation/Petition to Revoke Probation No. 2957, as served May 31, 2006 and June 8, 2006, contains references to the underlying disciplinary action entitled "In the Matter of the Accusation against Christiana Ann Roach" which, pursuant to a decision of the Board of Pharmacy effective May 27, 2005, revoked Respondent's Pharmacist License but stayed revocation in favor of probation for five (5) years. Those references mistakenly use the Board of Pharmacy case number for the present disciplinary action (2957) rather than the first case number (2593). This clerical error is hereby corrected as part of the Board's Default Decision and Order. This Errata page shall become part of Respondent's disciplinary history with the Board. For the purposes of correcting the record, the following changes are hereby made to Exhibit A:

Page 1, Line 28: Substitute "2593 " for "2957"

Page 4, Line 28: Substitute "2593 " for "2957"

Page 7, Line 10: Substitute "2593 " for "2957"

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

12 In the Matter of the Accusation and Petition to  
Revoke Probation Against:

Case No. 2957

13 CHRISTIANA ANN ROACH  
14 10380 Maya Linda Road #C206  
San Diego, California 92126

**ACCUSATION AND PETITION TO  
REVOKE PROBATION**

15 Pharmacist License No. RPH 49859

16 Respondent.  
17

18 Complainant alleges:

19 PARTIES

20 1. Patricia F. Harris ("Complainant") brings this Accusation and Petition to  
21 Revoke Probation solely in her official capacity as the Executive Officer of the Board of  
22 Pharmacy, Department of Consumer Affairs.

23 2. On or about September 15, 1997, the Board of Pharmacy issued  
24 Pharmacist License No. RPH 49859 to Christiana Ann Roach ("Respondent"). The license was  
25 in effect at all times relevant to the charges brought herein, and will expire on April 30, 2007,  
26 unless renewed.

27 3. In a disciplinary action entitled "In the Matter of Accusation against  
28 Christiana Ann Roach," Case No. 2957, the Board of Pharmacy issued a decision, effective

1 May 27, 2005, in which Respondent's Pharmacist License was revoked. However, the revocation  
2 was stayed and Respondent's license was placed on probation for a period of five (5) years with  
3 certain terms and conditions. A copy of that decision is attached as Exhibit A and is incorporated  
4 by reference.

#### 5 JURISDICTION

6 4. This Petition to Revoke Probation is brought before the Board of  
7 Pharmacy ("Board"), Department of Consumer Affairs under the authority of the below  
8 mentioned statutes and regulations.<sup>1</sup>

9 5. Section 4300 of the Code states in pertinent part:

10 "(a) Every license issued may be suspended or revoked.

11 "(b) The board shall discipline the holder of any license issued by  
12 the board, whose default has been entered or whose case has been heard by the  
13 board and found guilty, by any of the following methods:

14 "(1) Suspending judgment.

15 "(2) Placing him or her on probation.

16 "(3) Suspending his or her right to practice for a period not  
17 exceeding one year.

18 "(4) Revoking his or her license.

19 "(5) Taking any other action in relation to disciplining him or her as the  
20 board in its discretion may deem proper.

21 " . . .

22 "(e) The proceedings under this article shall be conducted in  
23 accordance with Chapter 5 (commencing with Section 11500) of Part 1 of  
24 Division 3 of the Government Code, and the board shall have all the powers  
25 granted therein. The action shall be final, except that the propriety of the action is  
26

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27 1. All statutory references are to the Business and Professions Code (Code) unless  
28 otherwise indicated.



1 subject to review by the superior court pursuant to Section 1094.5 of the Code of  
2 Civil Procedure."

3 6. Section 4301 of the Code states in pertinent part:

4 "The board shall take action against any holder of a license who is  
5 guilty of unprofessional conduct or whose license has been procured by fraud or  
6 misrepresentation or issued by mistake. Unprofessional conduct shall include, but  
7 is not limited to, any of the following:

8 " . . .

9 "(h) The administering to oneself, of any controlled substance, or  
10 the use of any dangerous drug or of alcoholic beverages to the extent or in a  
11 manner as to be dangerous or injurious to oneself, to a person holding a license  
12 under this chapter, or to any other person or to the public, or to the extent that the  
13 use impairs the ability of the person to conduct with safety to the public the  
14 practice authorized by the license.

15 " . . . "

16 7. Section 125.3 of the Code states, in pertinent part, that the Board  
17 may request the administrative law judge to direct a licentiate found to have committed a  
18 violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the  
19 investigation and enforcement of the case,

20 8. Health and Safety Code section 11055 states that Hydromorphone is an  
21 opiate and classified as a Schedule II Controlled Substance.

22 9. California Code of Regulations, title 16, section 1773, states in pertinent  
23 part:

24 "(a) Unless otherwise directed by the Board in its sole discretion,  
25 any pharmacist who is serving a period of probation shall comply with the  
26 following conditions:

27 "(1) Obey all laws and regulations substantially related to  
28 the practice of Pharmacy;

1                   "(2) Report to the Board or its designee quarterly either in  
2 person or in writing as directed; the report shall include the name  
3 and address of the probationer's employer. If the final probation  
4 report is not made as directed, the period of probation shall be  
5 extended until such time as the final report is made;

6                   " . . .

7                   "(b) If ordered by the Board in an administrative action or  
8 agreed upon in the stipulated settlement of an administrative action,  
9 any registered pharmacist who is serving a period of probation shall  
10 comply with any or all of the following conditions:

11                   " . . .

12                   "(3) Allow the Board to obtain samples of blood or urine (at  
13 the pharmacist's option) for analysis at the pharmacist's expense, if the  
14 need for such a procedure is indicated by the circumstances leading  
15 to the violation and is directed by the Board:

16                   " . . . "

17                   FIRST CAUSE FOR DISCIPLINE

18                   (Unprofessional Conduct - Use of Dangerous Drugs)

19                   10.       Respondent is subject to disciplinary action under section 4301(h) in that  
20 she used dangerous drugs in a manner dangerous or injurious to herself or another person or to  
21 the public, or to the extent that such use impaired her ability to conduct with safety to the public  
22 the practice authorized by her license, in that on or around August 24, 2005, Respondent used  
23 opiates (hydromorphone), which was discovered during a drug screening conducted while  
24 Respondent was participating in the Pharmacist Recovery Program.

25                   **OTHER MATTERS**

26                   11.       In order to determine the degree of penalty, if any, to be imposed on  
27 Respondent, Complainant alleges that on April 27, 2005, the Board adopted Decision and Order  
28 No. 2957, effective May 27, 2005, revoking Pharmacist License No. RPH 49859, issued to

1 Respondent, for violation of Business and Professions Code sections 4301, 4060, and 490.

2 **PETITION TO REVOKE PROBATION**

3 12. The allegations in paragraphs 1 through 11 are incorporated herein by  
4 reference, as if fully set forth at this point.

5 FIRST CAUSE TO REVOKE PROBATION

6 (Failure to Complete the Pharmacists Recovery Program)

7 13. At all times after the effective date of Respondent's probation, Condition  
8 17 stated:

9 **"Rehabilitation Program - Pharmacists Recovery Program (PRP).**

10 Within 30 days of the effective date of this decision, Respondent shall contact the Pharmacists  
11 Recovery Program for evaluation and shall successfully participate in and complete the  
12 treatment contract and any subsequent addendums as recommended and provided by the PRP  
13 and as approved by the Board. The costs for PRP participation shall be borne by the  
14 Respondent.

15 "If Respondent is currently enrolled in the PRP, said participation is now  
16 mandatory and is no longer considered a self-referral under Business and Professions Code  
17 section 4363, as of the effective date of this decision. Respondent shall successfully  
18 participate in and complete her current contract and any subsequent addendums with the PRP.  
19 Probation shall be automatically extended until Respondent successfully completes her  
20 treatment contract. Any person terminated from the program shall be automatically suspended  
21 upon notice by the Board. Respondent may not resume the practice of pharmacy until notified  
22 by the Board in writing. The Board shall retain jurisdiction to institute action to terminate  
23 probation for any violation of this term."

24 14. Respondent's probation is subject to revocation in that she failed to  
25 comply with Probation Condition 17, referenced above, in that on or about August 31, 2005,  
26 Respondent sent a letter to the PRP indicating she was withdrawing from the program.  
27 Subsequently, on or about September 16, 2005, Respondent was terminated from the Pharmacists  
28 Recovery Program.





**Exhibit A**  
**Decision and Order**  
**Board of Pharmacy Case No. 2593**

BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

CHRISTIANA ANN ROACH  
10380 Maya Linda Road, Apt. C-206  
San Diego, CA 92126

Pharmacist License No. RPH 49859

Respondent.

Case No. 2593

OAH No. L-2004110082

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Pharmacy as its Decision in this matter.

This Decision shall become effective on May 27, 2005.

It is so ORDERED April 27, 2005.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

By



STANLEY W. GOLDENBERG  
Board President

1 BILL LOCKYER, Attorney General  
of the State of California  
2 KATHLEEN B.Y. LAM, State Bar No. 95379  
Deputy Attorney General  
3 California Department of Justice  
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6 Telephone: (619) 645-2091  
7 Facsimile: (619) 645-2061

8 Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

Case No. 2593

12 CHRISTIANA ANN ROACH  
10380 Maya Linda Road, Apt. C-206  
13 San Diego, CA 92126

OAH No. L-2004110082

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

14 Pharmacist License No. RPH 49859

15 Respondent.

17 In the interest of a prompt and speedy settlement of this matter, consistent with the  
18 public interest and the responsibility of the Board of Pharmacy ("Board"), the parties hereby  
19 agree to the following Stipulated Settlement and Disciplinary Order which will be submitted to  
20 the Board for approval and adoption as the final disposition of the Accusation.

21 PARTIES

22 1. Patricia F. Harris ("Complainant") is the Executive Officer of the Board of  
23 Pharmacy. She brought this action solely in her official capacity, and is represented in  
24 this matter by Bill Lockyer, Attorney General of the State of California, by Kathleen B.Y. Lam,  
25 Deputy Attorney General.

26 2. Respondent CHRISTIANA ANN ROACH ("Respondent") is represented  
27 in this proceeding by attorney M. Gayle Askren, Esq., whose address is 1224 Tenth Street #206  
28 Coronado, California 92118-3420.

RECEIVED  
STATE OF CALIFORNIA  
DEPARTMENT OF CONSUMER AFFAIRS  
DIVISION OF PHARMACY  
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CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 2593.

9. Respondent agrees that her Pharmacist license is subject to discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

CONTINGENCY

10. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

11. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Pharmacist License No. RPH 49859 issued to Respondent CHRISTIANA ANN ROACH ("Respondent") is revoked. However, the revocation is stayed and Respondent is placed on probation for five (5) years on the following terms and conditions.

1. Actual Suspension - Pharmacist. Pharmacist License No. RPH 49859, issued to Respondent Christiana Ann Roach is suspended for a period of two (2) years. However, Respondent shall be given credit for the time her pharmacist license was suspended by the Superior Court in *People of the State of California v. Christiana Ann Roach*, San Diego County Superior Court Case No. CD 170485. In addition, Respondent cannot practice as a pharmacist without the approval of the Pharmacist Recovery Program ("PRP").

During suspension, Respondent shall not enter any pharmacy area or any portion of the licensed premises of a wholesaler, veterinary food-animal drug retailer or any other distributor of drugs which is licensed by the Board, or any manufacturer, or where dangerous drugs and devices or controlled substances are maintained. Respondent shall not practice

1 pharmacy nor do any act involving drug selection, selection of stock, manufacturing,  
2 compounding, dispensing or patient consultation; nor shall Respondent manage, administer, or  
3 be a consultant to any licensee of the Board, or have access to or control the ordering,  
4 manufacturing or dispensing of dangerous drugs and devices or controlled substances.

5 Respondent shall not engage in any activity that requires the professional  
6 judgment of a pharmacist. Respondent shall not direct or control any aspect of the practice of  
7 pharmacy. Respondent shall not perform the duties of a pharmacy technician or an exemptee for  
8 any entity licensed by the Board. Subject to the above restrictions, Respondent may continue to  
9 own or hold an interest in any pharmacy in which she holds an interest at the time this decision  
10 becomes effective unless otherwise specified in this order.

11 2. **Obey All Laws.** Respondent shall obey all state and federal laws and  
12 regulations substantially related to or governing the practice of pharmacy.

13 Respondent shall report any of the following occurrences to the Board, in writing,  
14 within 72 hours of such occurrence:

- 15 • an arrest or issuance of a criminal complaint for violation of any provision of the  
16 Pharmacy Law, state and federal food and drug laws, or state and federal  
17 controlled substances laws
- 18 • a plea of guilty or nolo contendere in any state or federal criminal proceeding to  
19 any criminal complaint, information or indictment
- 20 • a conviction of any crime
- 21 • discipline, citation, or other administrative action filed by any state and federal  
22 agency which involves Respondent's license or which is related to the practice  
23 of pharmacy or the manufacturing, obtaining, handling or distribution or billing  
24 or charging for any drug, device or controlled substance.

25 3. **Reporting to the Board.** Respondent shall report to the Board  
26 quarterly. The report shall be made either in person or in writing, as directed. Respondent  
27 shall state under penalty of perjury whether there has been compliance with all the terms and  
28 conditions of probation. If the final probation report is not made as directed, probation shall

1 be extended automatically until such time as the final report is made and accepted by the  
2 Board.

3           4.     **Interview with the Board.** Upon receipt of reasonable notice,  
4 Respondent shall appear in person for interviews with the Board upon request at various  
5 intervals at a location to be determined by the Board. Failure to appear for a scheduled  
6 interview without prior notification to Board staff shall be considered a violation of probation.

7           5.     **Cooperation with Board Staff.** Respondent shall cooperate with the  
8 Board's inspectional program and in the Board's monitoring and investigation of Respondent's  
9 compliance with the terms and conditions of her probation. Failure to comply shall be  
10 considered a violation of probation.

11           6.     **Continuing Education.** Respondent shall provide evidence of efforts  
12 to maintain skill and knowledge as a pharmacist as directed by the Board.

13           7.     **Notice to Employers.** Respondent shall notify all present and  
14 prospective employers of the decision in Case No. 2593, and the terms, conditions and  
15 restrictions imposed on Respondent by the decision. Within 30 days of the effective date of  
16 this decision, and within 15 days of Respondent undertaking new employment, Respondent  
17 shall cause her direct supervisor, pharmacist-in-charge and/or owner to report to the Board in  
18 writing acknowledging the employer has read the decision in Case No. 2593.

19           If Respondent works for or is employed by or through a pharmacy employment  
20 service, Respondent must notify the direct supervisor, pharmacist-in-charge, and/or owner at  
21 every pharmacy of the and terms conditions of the decision in Case No. 2593 in advance of the  
22 Respondent commencing work at each pharmacy.

23           "Employment" within the meaning of this provision shall include any full-time, part-  
24 time, temporary, relief or pharmacy management service as a pharmacist, whether the  
25 Respondent is considered an employee or independent contractor.

26           8.     **No Preceptorships, Supervision of Interns, Being Pharmacist-in-  
27 Charge (PIC), or Serving as a Consultant.** Respondent shall not supervise any intern  
28 pharmacist or perform any of the duties of a preceptor, nor shall Respondent be the

1 pharmacist-in-charge of any entity licensed by the Board unless otherwise specified in this  
2 order.

3           9.       **Reimbursement of Board Costs.** Respondent shall pay to the Board  
4 its costs of investigation and prosecution in the amount of \$6,573. Respondent shall pay said  
5 costs on a quarterly basis.

6           The filing of bankruptcy by Respondent shall not relieve Respondent of her  
7 responsibility to reimburse the Board its costs of investigation and prosecution.

8           10.       **Probation Monitoring Costs.** Respondent shall pay the costs  
9 associated with probation monitoring as determined by the Board each and every year of  
10 probation. Such costs shall be payable to the Board at the end of each year of probation.  
11 Failure to pay such costs shall be considered a violation of probation.

12           11.       **Status of License.** Respondent shall, at all times while on probation,  
13 maintain an active current license with the Board, including any period during which  
14 suspension or probation is tolled.

15           If Respondent's license expires or is cancelled by operation of law or otherwise,  
16 upon renewal or reapplication, Respondent's license shall be subject to all terms and  
17 conditions of this probation not previously satisfied.

18           12.       **License Surrender while on Probation/Suspension.** Following  
19 the effective date of this decision, should Respondent cease practice due to retirement or  
20 health, or be otherwise unable to satisfy the terms and conditions of probation, Respondent  
21 may tender her license to the Board for surrender. The Board shall have the discretion  
22 whether to grant the request for surrender or take any other action it deems appropriate and  
23 reasonable. Upon formal acceptance of the surrender of the license, Respondent will no  
24 longer be subject to the terms and conditions of probation.

25           Upon acceptance of the surrender, Respondent shall relinquish her pocket  
26 license to the Board within 10 days of notification by the Board that the surrender is accepted.  
27 Respondent may not reapply for any license from the Board for three years from the effective  
28 date of the surrender. Respondent shall meet all requirements applicable to the license sought

1 as of the date the application for that license is submitted to the Board.

2           13.    **Notification of Employment/Mailing Address Change.** Respondent  
3 shall notify the Board in writing within 10 days of any change of employment. Said  
4 notification shall include the reasons for leaving and/or the address of the new employer,  
5 supervisor or owner and work schedule if known. Respondent shall notify the Board in  
6 writing within 10 days of a change in name, mailing address or phone number.

7           14.    **Tolling of Probation.** Should Respondent, regardless of residency, for  
8 any reason cease practicing pharmacy for a minimum of forth (40) hours per calendar month  
9 in California, Respondent must notify the Board in writing within 10 days of cessation of the  
10 practice of pharmacy or the resumption of the practice of pharmacy. Such periods of time  
11 shall not apply to the reduction of the probation period. It is a violation of probation for  
12 Respondent's probation to remain tolled pursuant to the provisions of this condition for a  
13 period exceeding three years.

14           "Cessation of practice" means any period of time exceeding 30 days in which  
15 Respondent is not engaged in the practice of pharmacy as defined in Section 4052 of  
16 the Business and Professions Code.

17           15.    **Violation of Probation.** If Respondent violates probation in any  
18 respect, the Board, after giving Respondent notice and an opportunity to be heard, may revoke  
19 probation and carry out the disciplinary order which was stayed. If a petition to revoke  
20 probation or an accusation is filed against Respondent during probation, the Board shall have  
21 continuing jurisdiction and the period of probation shall be extended, until the petition to  
22 revoke probation or accusation is heard and decided.

23           If Respondent has not complied with any term or condition of probation, the  
24 Board shall have continuing jurisdiction over Respondent, and probation shall automatically  
25 be extended until all terms and conditions have been satisfied or the Board has taken other  
26 action as deemed appropriate to treat the failure to comply as a violation of probation, to  
27 terminate probation, and to impose the penalty which was stayed.

28           16.    **Completion of Probation.** Upon successful completion of probation,

1 Respondent's license will be fully restored.

2           **17. Rehabilitation Program - Pharmacists Recovery Program (PRP).**

3 Within 30 days of the effective date of this decision, Respondent shall contact the Pharmacists  
4 Recovery Program for evaluation and shall successfully participate in and complete the  
5 treatment contract and any subsequent addendums as recommended and provided by the PRP  
6 and as approved by the Board. The costs for PRP participation shall be borne by the  
7 Respondent.

8           If Respondent is currently enrolled in the PRP, said participation is now  
9 mandatory and is no longer considered a self-referral under Business and Professions Code  
10 section 4363, as of the effective date of this decision. Respondent shall successfully  
11 participate in and complete her current contract and any subsequent addendums with the PRP.  
12 Probation shall be automatically extended until Respondent successfully completes her  
13 treatment contract. Any person terminated from the program shall be automatically suspended  
14 upon notice by the Board. Respondent may not resume the practice of pharmacy until notified  
15 by the Board in writing. The Board shall retain jurisdiction to institute action to terminate  
16 probation for any violation of this term.

17           **18. Random Drug Screening.** Respondent, at her own expense, shall  
18 participate in random testing, including but not limited to biological fluid testing (urine,  
19 blood), breathalyzer, hair follicle testing, or a drug screening program approved by the Board.  
20 The length of time shall be for the entire probation period and the frequency of testing will be  
21 determined by the Board. At all times Respondent shall fully cooperate with the Board, and  
22 shall, when directed, submit to such tests and samples for the detection of alcohol, narcotics,  
23 hypnotics, dangerous drugs or other controlled substances. Failure to submit to testing as  
24 directed shall constitute a violation of probation. Any confirmed positive drug test shall result  
25 in the immediate suspension of practice by Respondent. Respondent may not resume the  
26 practice of pharmacy until notified by the Board in writing.

27           **19. Abstain from Drugs and Alcohol Use.** Respondent shall completely  
28 abstain from the possession or use of alcohol, controlled substances, dangerous drugs and their

1 associated paraphernalia except when the drugs are lawfully prescribed by a licensed  
2 practitioner as part of a documented medical treatment. Upon request of the Board,  
3 Respondent shall provide documentation from the licensed practitioner that the prescription  
4 was legitimately issued and is a necessary part of the treatment of the Respondent.

5           20.    **Supervised Practice.** Respondent shall practice only under the  
6 supervision of a pharmacist not on probation with the Board. Respondent shall not practice  
7 until the supervisor is approved by the Board. The supervision shall be, as required by the  
8 Board, either:

9                   Continuous - 75% to 100% of a work week

10                   Substantial - At least 50% of a work week

11                   Partial - At least 25% of a work week

12                   Daily Review - Supervisor's review of probationer's daily activities within 24  
13           hours

14   Within 30 days of the effective date of this decision, Respondent shall have her supervisor  
15 submit notification to the Board in writing stating the supervisor has read the decision in Case  
16 No. 2593 and is familiar with the level of supervision as determined by the Board.

17           If Respondent changes employment, Respondent shall have her new supervisor,  
18 within 15 days after employment commences, submit notification to the Board in writing  
19 stating the direct supervisor and pharmacist-in-charge have read the decision in Case No. 2593  
20 and is familiar with the level of supervision as determined by the Board.

21           Within 10, days of leaving employment, Respondent shall notify the Board in  
22 writing.

23           21.    **No Ownership of Premises.** Respondent shall not own, have any legal  
24 or beneficial interest in, or serve as a manager, administrator, member, officer, director,  
25 associate, or partner of any business, firm, partnership, or corporation currently or hereinafter  
26 licensed by the Board. Respondent shall sell or transfer any legal or beneficial interest in any  
27 entity licensed by the Board within 90 days following the effective date of this decision and  
28 shall immediately thereafter provide written proof thereof to the Board.



1                   22.    **Tolling of Suspension.** If Respondent leaves California to reside or  
2 practice outside this state, for any period exceeding 10 days (including vacation), Respondent  
3 must notify the Board in writing of the dates of departure and return. Periods of residency or  
4 practice outside the state - or any absence exceeding a period of 10 days shall not apply to the  
5 reduction of the suspension period.

6                   Respondent shall not practice pharmacy upon returning to this state until  
7 notified by the Board that the period of suspension has been completed.

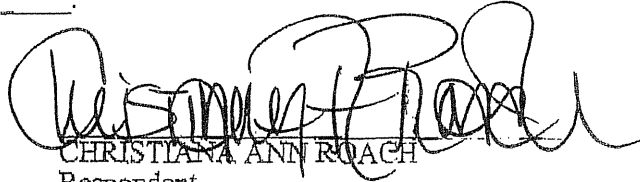
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ACCEPTANCE

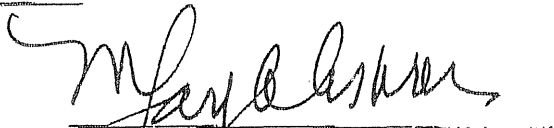
I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, M. Gayle Askren, Esq. I understand the stipulation and the effect it will have on my Pharmacist license. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: 3/21/05

  
CHRISTIANA ANN ROACH  
Respondent

I have read and fully discussed with Respondent CHRISTIANA ANN ROACH the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 3/21/05

  
M. GAYLE ASKREN, Esq.  
Attorney for Respondent

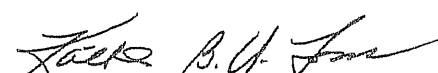
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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Pharmacy.

DATED: 3/22/05.

BILL LOCKYER, Attorney General  
of the State of California

  
KATHLEEN B.Y. LAM  
Deputy Attorney General

Attorneys for Complainant

DOJ Matter ID: SD2002AD0872  
KBL:dim  
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1 BILL LOCKYER, Attorney General  
of the State of California  
2 KATHLEEN B.Y. LAM, State Bar No. 95379  
Deputy Attorney General  
3 California Department of Justice  
110 West "A" Street, Suite 1100  
4 San Diego, CA 92101

5 P.O. Box 85266  
San Diego, CA 92186-5266  
6 Telephone: (619) 645-2091  
Facsimile: (619) 645-2061

7 Attorneys for Complainant  
8

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

12 In the Matter of the Accusation/  
Petition to Revoke Probation Against:

13 CHRISTIANA ANN ROACH, R.P.H.

14 Respondent.  
15

Case No. 2957

**REQUEST FOR DISCOVERY**

[Gov. Code § 11507.6]

16 TO RESPONDENT:

17 Under section 11507.6 of the Government Code of the State of California, parties  
18 to an administrative hearing, including the Complainant, are entitled to certain information  
19 concerning the opposing party's case. A copy of the provisions of section 11507.6 of the  
20 Government Code concerning such rights is included among the papers served.

21 PURSUANT TO SECTION 11507.6 OF THE GOVERNMENT CODE, YOU  
22 ARE HEREBY REQUESTED TO:

- 23 1. Provide the names and addresses of witnesses to the extent known to the  
24 Respondent, including, but not limited to, those intended to be called to testify at the hearing, and  
25 2. Provide an opportunity for the Complainant to inspect and make a copy of any of  
26 the following in the possession or custody or under control of the Respondent:  
27 a. A statement of a person, other than the Respondent, named in the initial  
28 administrative pleading, or in any additional pleading, when it is claimed that the act or

1 omission of the Respondent as to this person is the basis for the administrative  
2 proceeding;

3 b. A statement pertaining to the subject matter of the proceeding made by any  
4 party to another party or persons;

5 c. Statements of witnesses then proposed to be called by the Respondent and  
6 of other persons having personal knowledge of the acts, omissions or events which are the  
7 basis for the proceeding, not included in (a) or (b) above;

8 d. All writings, including but not limited to reports of mental, physical and  
9 blood examinations and things which the Respondent now proposes to offer in evidence;

10 e. Any other writing or thing which is relevant and which would be  
11 admissible in evidence, including but not limited to, any patient or hospital records  
12 pertaining to the persons named in the pleading;

13 f. Investigative reports made by or on behalf of the Respondent pertaining to  
14 the subject matter of the proceeding, to the extent that these reports (1) contain the names  
15 and addresses of witnesses or of persons having personal knowledge of the acts,  
16 omissions or events which are the basis for the proceeding, or (2) reflect matters  
17 perceived by the investigator in the course of his or her investigation, or (3) contain or  
18 include by attachment any statement or writing described in (a) to (e), inclusive, or  
19 summary thereof.

20 For the purpose of this Request for Discovery, "statements" include written  
21 statements by the person, signed, or otherwise authenticated by him or her, stenographic,  
22 mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person,  
23 and written reports or summaries of these oral statements.

24 YOU ARE HEREBY FURTHER NOTIFIED that nothing in this Request for  
25 Discovery should be deemed to authorize the inspection or copying of any writing or thing which  
26 is privileged from disclosure by law or otherwise made confidential or protected as attorney's  
27 work product.

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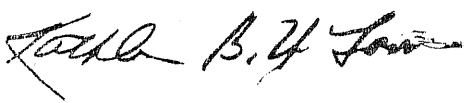
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Your response to this Request for Discovery should be directed to the undersigned attorney for the Complainant at the address on the first page of this Request for Discovery **within 30 days after service** of the Accusation/Petition to Revoke Probation.

Failure without substantial justification to comply with this Request for Discovery may subject the Respondent to sanctions pursuant to sections 11507.7 and 11455.10 to 11455.30 of the Government Code.

DATED: May 3, 2006.

BILL LOCKYER, Attorney General  
of the State of California



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KATHLEEN B.Y. LAM  
Deputy Attorney General

Attorneys for Complainant

80072760.wpd

1 BILL LOCKYER, Attorney General  
of the State of California  
2 KATHLEEN B.Y. LAM, State Bar No. 95379  
Deputy Attorney General  
3 California Department of Justice  
110 West "A" Street, Suite 1100  
4 San Diego, CA 92101

5 P.O. Box 85266  
San Diego, CA 92186-5266  
6 Telephone: (619) 645-2091  
Facsimile: (619) 645-2061

7 Attorneys for Complainant

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

11  
12 In the Matter of the Accusation/  
Petition to Revoke Probation Against:  
13  
14 CHRISTIANA ANN ROACH, R.P.H.  
Respondent.

Case No. 2957  
**STATEMENT TO RESPONDENT**  
[Gov. Code §§ 11504, 11505(b)]

15  
16  
17 TO RESPONDENT:

18 Enclosed is a copy of the Accusation/Petition to Revoke Probation that has been  
19 filed with the Board of Pharmacy, and which is hereby served on you.

20 Unless a written request for a hearing signed by you or on your behalf is delivered  
21 or mailed to the Board of Pharmacy within fifteen (15) days after a copy of the Accusation/  
22 Petition to Revoke Probation was personally served on you or mailed to you, you will be deemed  
23 to have waived your right to a hearing in this matter and the Board may proceed upon the  
24 Accusation/Petition to Revoke Probation without a hearing and may take action thereon as  
25 provided by law.

26 The request for hearing may be made by delivering or mailing one of the enclosed  
27 forms entitled "Notice of Defense," or by delivering or mailing a Notice of Defense as provided  
28 in section 11506 of the Government Code, to -

1                   **Kathleen B.Y. Lam**  
2                   **Deputy Attorney General**  
3                   **110 West "A" Street, Suite 1100**  
4                   **San Diego, CA 92101**

5                   **P.O. Box 85266**  
6                   **San Diego, CA 92186-5266**

7                   You may, but need not, be represented by counsel at any or all stages of these  
8 proceedings.

9                   The enclosed Notice of Defense, if signed and filed with the Board, shall be  
10 deemed a specific denial of all parts of the Accusation/Petition to Revoke Probation, but you will  
11 not be permitted to raise any objection to the form of the Accusation/Petition to Revoke  
12 Probation unless you file a further Notice of Defense as provided in section 11506 of the  
13 Government Code within fifteen (15) days after service of the Accusation/Petition to Revoke  
14 Probation on you.

15                   If you file any Notice of Defense within the time permitted, a hearing will be held  
16 on the charges made in the Accusation/Petition to Revoke Probation.

17                   The hearing may be postponed for good cause. If you have good cause, you are  
18 obliged to notify the Office of Administrative Hearings, 1350 Front Street, Suite 6022, San  
19 Diego, California 92101, within ten (10) working days after you discover the good cause. Failure  
20 to notify the Office of Administrative Hearings within ten (10) days will deprive you of a  
21 postponement.

22                   Copies of sections 11507.5, 11507.6, and 11507.7 of the Government Code are  
23 enclosed.

24                   If you desire the names and addresses of witnesses or an opportunity to inspect  
25 and copy the items mentioned in section 11507.6 of the Government Code in the possession,  
26 custody or control of the Board you may send a Request for Discovery to the above designated  
27 Deputy Attorney General.

28                   ///

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**NOTICE REGARDING STIPULATED SETTLEMENTS**

It may be possible to avoid the time, expense and uncertainties involved in an administrative hearing by disposing of this matter through a stipulated settlement. A stipulated settlement is a binding written agreement between you and the government regarding the matters charged and the discipline to be imposed. Such a stipulation would have to be approved by the but, once approved, it would be incorporated into a final order.

Any stipulation must be consistent with the Board's established disciplinary guidelines; however, all matters in mitigation or aggravation will be considered. A copy of the Board's Disciplinary Guidelines will be provided to you on your written request to the state agency bringing this action.

If you are interested in pursuing this alternative to a formal administrative hearing, or if you have any questions, you or your attorney should contact Deputy Attorney General Kathleen B.Y. Lam at the earliest opportunity.

\*\*\*\*\*

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**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation/  
Petition to Revoke Probation Against:

CHRISTIANA ANN ROACH, R.P.H.

Respondent.

Case No. 2957

**NOTICE OF DEFENSE**

[Gov. Code §§ 11505 and 11506]

I, the undersigned Respondent in the above-entitled proceeding, hereby acknowledge receipt of a copy of the Accusation/Petition to Revoke Probation; Statement to Respondent; Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery; and two copies of a Notice of Defense.

I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation/Petition to Revoke Probation.

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

Respondent's Name \_\_\_\_\_

Respondent's Signature \_\_\_\_\_

Respondent's Mailing Address \_\_\_\_\_

City, State and Zip Code \_\_\_\_\_

Respondent's Telephone Number \_\_\_\_\_

**Check appropriate box:**

- I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name \_\_\_\_\_

Counsel's Mailing Address \_\_\_\_\_

City, State and Zip Code \_\_\_\_\_

Counsel's Telephone Number \_\_\_\_\_

- I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation/Petition to Revoke Probation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

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**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation/  
Petition to Revoke Probation Against:

CHRISTIANA ANN ROACH, R.P.H.

Respondent.

Case No. 2957

**NOTICE OF DEFENSE**

[Gov. Code §§ 11505 and 11506]

I, the undersigned Respondent in the above-entitled proceeding, hereby acknowledge receipt of a copy of the Accusation/Petition to Revoke Probation; Statement to Respondent; Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery; and two copies of a Notice of Defense.

I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation/Petition to Revoke Probation.

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

Respondent's Name

Respondent's Signature

Respondent's Mailing Address

City, State and Zip Code

Respondent's Telephone Number

**Check appropriate box:**

- I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

City, State and Zip Code

Counsel's Telephone Number

- I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation/Petition to Revoke Probation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

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**COPY OF GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7  
PROVIDED PURSUANT TO GOVERNMENT CODE SECTIONS 11504 AND 11505**

**SECTION 11507.5: Exclusivity of discovery provisions**

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

**SECTION 11507.6: Request for discovery**

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

## **SECTION 11507.7: Petition to compel discovery; Order; Sanctions**

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of Section 915 of the Evidence Code and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

\*\*\*\*\*

**DECLARATION OF SERVICE BY CERTIFIED MAIL AND FIRST CLASS MAIL**

(Separate Mailings)

Case Name: In the Matter of the Accusation and  
Petition to Revoke Probation Against:  
**CHRISTIANA ANN ROACH**

Case No. **2957**  
No.: **L-2004110082**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On **May 3, 2006**, I served the attached

**ACCUSATION AND PETITION TO REVOKE PROBATION;  
STATEMENT TO RESPONDENT; REQUEST FOR DISCOVERY;  
NOTICE OF DEFENSE (2 COPIES); and DISCOVERY STATUTES**

by placing a true copy thereof enclosed in a sealed envelope as certified mail with postage thereon fully prepaid and return receipt requested, and another true copy of the

**ACCUSATION AND PETITION TO REVOKE PROBATION;  
STATEMENT TO RESPONDENT; REQUEST FOR DISCOVERY;  
NOTICE OF DEFENSE (2 COPIES); and DISCOVERY STATUTES**

was enclosed in a second sealed envelope as first class mail with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 110 West A Street, Suite 1100, P.O. Box 85266, San Diego, CA 92186-5266, addressed as follows:

**Christiana Ann Roach  
10380 Maya Linda Road, Apt. C-206  
San Diego, CA 92126**

**COURTESY COPY TO:  
Kim DeLong, Enforcement Analyst  
Board of Pharmacy  
400 R Street, Suite 4070  
Sacramento, California 95814**

**Certified Article Number**


7160 3901 9849 3220 1470

**SENDERS RECORD**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on **May 3, 2006**, at San Diego, California.

MONA S. SEBASTIAN

Declarant



Signature



**DECLARATION OF SERVICE BY CERTIFIED MAIL AND FIRST CLASS MAIL**

(Separate Mailings)

Case Name: In the Matter of the Accusation and  
Petition to Revoke Probation Against:  
**CHRISTIANA ANN ROACH**

Case No. **2957**  
No.: **L-2004110082**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On **June 8, 2006**, I served the attached

**ACCUSATION AND PETITION TO REVOKE PROBATION;  
STATEMENT TO RESPONDENT; REQUEST FOR DISCOVERY;  
NOTICE OF DEFENSE (2 COPIES); and DISCOVERY STATUTES**

by placing a true copy thereof enclosed in a sealed envelope as certified mail with postage thereon fully prepaid and return receipt requested, and another true copy of the

**ACCUSATION AND PETITION TO REVOKE PROBATION;  
STATEMENT TO RESPONDENT; REQUEST FOR DISCOVERY;  
NOTICE OF DEFENSE (2 COPIES); and DISCOVERY STATUTES**

was enclosed in a second sealed envelope as first class mail with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 110 West A Street, Suite 1100, P.O. Box 85266, San Diego, CA 92186-5266, addressed as follows:

**Christiana Ann Roach  
6035 W. Berenice Avenue  
Chicago, IL 60634-2540**

**COURTESY COPY TO:  
Kim DeLong, Enforcement Analyst  
Board of Pharmacy  
1625 North Market Boulevard, Ste. N-219  
Sacramento, California 95834**

**Certified Article Number**

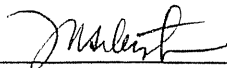
**7106 4575 1294 3322 9785**

**SENDERS RECORD**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on **June 8, 2006**, at San Diego, California.

**MONA S. SEBASTIAN**

Declarant



Signature

Exhibit B

Postal Return Documents (May 31, 2006 Service)

CERTIFIED MAIL



7160 3901 9849 3220 1470

RETURN RECEIPT REQUESTED



016128502775

\$06.080

05/03/2006

Mailed From 92101

US POSTAGE

Master

1st NOTICE \_\_\_\_\_

2nd NOTICE 5/13

FINAL NOTICE 5/23/06

DEPARTMENT OF JUSTICE

KATHLEEN B.Y. LAM

Office of the Attorney General  
110 West "A" Street, Suite 1100  
San Diego, California 92101

TO

Christiana Ann Roach

RCAC380 921263069 1106 44 05/05/06  
NOTIFY SENDER OF NEW ADDRESS  
ROACH, CHRISTIANA A  
6035 W BERENICE AVE  
CHICAGO IL 60634-2540

UNCLAIMED

NK  
5-8-06  
O/S 06

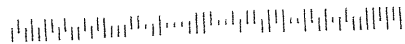
UNCLAIMED

UNCLAIMED

ATTORNEY  
KATHLEEN B.Y. LAM

Exhibit C

Postal Return Documents (June 19, 2006 Service - 1<sup>st</sup> Class)



016128502775

\$0.830

06/08/2006

Mailed From 92101  
US POSTAGE

Postnet

*Return  
Sender*

**KATHLEEN B.Y. LAM**

STATE OF CALIFORNIA  
DEPARTMENT OF JUSTICE  
OFFICE OF ATTORNEY GENERAL  
110 WEST A STREET, SUITE 1100  
P.O. BOX 85266  
SAN DIEGO, CA 92186-5266

~~Christiana Ann Ro:  
6035 W. Berenice  
Chicago, IL 60634-2540~~

ATTORNEY GENERAL

2006 JUN 10 AM 0:02

Exhibit D

Postal Return Documents (June 19, 2006 Service - Certified Mail)

RETURN RECEIPT REQUESTED

**SCAN  
BEFORE  
DELIVERY**

**KATHLEEN B.L. LAM**

STATE OF CALIFORNIA  
DEPARTMENT OF JUSTICE  
OFFICE OF ATTORNEY GENERAL  
110 WEST A STREET, SUITE 1100  
P.O. BOX 85266  
SAN DIEGO, CA 92186-5266

~~Christiana Ann Poach  
6035 W. Berenice Avenue  
Chicago, IL 60634-2540~~

UNCLAIMED  
JUN 10 2006  
SAN DIEGO, CA 92186

1st NOTICE \_\_\_\_\_  
2nd NOTICE 6/22  
FINAL NOTICE 6/27/06

UNCLAIMED  
JUN 10 2006  
SAN DIEGO, CA 92186

NL  
6-12-06  
C/S

UNCLAIMED  
JUN 10 2006  
SAN DIEGO, CA 92186

2006 JUN 10 10:00 AM  
SAN DIEGO, CA 92186

ATTORNEY GENERAL

10

