

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

In the Matter of the Accusation Against:

Case No. 3312

REEM NASSER
3121 Morning Way
La Jolla, CA 92037

Original Pharmacy Technician Registration No.
TCH 69031

Respondent.

DECISION AND ORDER

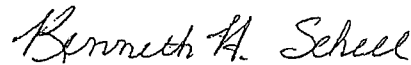
The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This decision shall become effective on April 29, 2010.

It is so ORDERED on March 30, 2010.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By



KENNETH H. SCHELL
Board President

1 EDMUND G. BROWN JR.
Attorney General of California
2 LINDA K. SCHNEIDER
Supervising Deputy Attorney General
3 MARICHELLE S. TAHIMIC
Deputy Attorney General
4 State Bar No. 147392
110 West "A" Street, Suite 1100
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Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

Case No. 3312

12 **REEM TERESA NASSER**
13 3121 Morning Way
14 La Jolla, CA 92037

OAH No. 2009070947

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

15 **Pharmacy Technician Registration No. TCH**
16 **69031**

17 Respondent.

18
19 In the interest of a prompt and speedy resolution of this matter, consistent with the public
20 interest and the responsibility of the Board of Pharmacy of the Department of Consumer Affairs
21 the parties hereby agree to the following Stipulated Surrender of License and Order which will be
22 submitted to the Board for approval and adoption as the final disposition of the Accusation.

23 **PARTIES**

24 1. Virginia Herold (Complainant) is the Executive Officer of the Board of Pharmacy.
25 She brought this action solely in her official capacity and is represented in this matter by Edmund
26 G. Brown Jr., Attorney General of the State of California, by Marichelle S. Tahimic, Deputy
27 Attorney General.
28

1 CULPABILITY

2 8. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. 3312, agrees that cause exists for discipline and hereby surrenders her Pharmacy Technician
4 Registration No. TCH 69031 for the Board's formal acceptance.

5 9. Respondent understands that by signing this stipulation she enables the Board to issue
6 an order accepting the surrender of her Pharmacy Technician Registration without further
7 process.

8 CONTINGENCY

9 10. This stipulation shall be subject to approval by the Board of Pharmacy. Respondent
10 understands and agrees that counsel for Complainant and the staff of the Board of Pharmacy may
11 communicate directly with the Board regarding this stipulation and surrender, without notice to or
12 participation by Respondent. By signing the stipulation, Respondent understands and agrees that
13 she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board
14 considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order,
15 the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this
16 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not
17 be disqualified from further action by having considered this matter.

18 11. The parties understand and agree that facsimile copies of this Stipulated Surrender of
19 License and Order, including facsimile signatures thereto, shall have the same force and effect as
20 the originals.

21 12. This Stipulated Surrender of License and Order is intended by the parties to be an
22 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
23 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
24 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
25 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
26 executed by an authorized representative of each of the parties.

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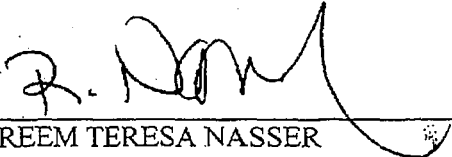
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7. Respondent shall pay the Board its costs of investigation and enforcement in the amount of \$5,447.25 prior to issuance of a new or reinstated license.

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Pharmacy Technician Registration. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: 1/5/10 
REEM TERESA NASSER
Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

Dated: January 4, 2010
Respectfully submitted,
EDMUND G. BROWN JR.
Attorney General of California
LINDA K. SCHNEIDER
Supervising Deputy Attorney General

MARICHELE S. TAHIMIC
Deputy Attorney General
Attorneys for Complainant

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1 7. Respondent shall pay the Board its costs of investigation and enforcement in the
2 amount of \$5,447.25 prior to issuance of a new or reinstated license.

3 ACCEPTANCE

4 I have carefully read the Stipulated Surrender of License and Order. I understand the
5 stipulation and the effect it will have on my Pharmacy Technician Registration. I enter into this
6 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to
7 be bound by the Decision and Order of the Board of Pharmacy.

8
9 DATED: _____

REEM TERESA NASSER
Respondent

10
11 ENDORSEMENT

12
13 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
14 for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

15
16 Dated: January ⁵ 4, 2010

Respectfully submitted,

EDMUND G. BROWN JR.
Attorney General of California
LINDA K. SCHNEIDER
Supervising Deputy Attorney General

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18
19
20 *Marichelle Tahimic*
21 MARICHELLE S. TAHIMIC
22 Deputy Attorney General
23 Attorneys for Complainant

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Exhibit A

Accusation No. 3312

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 LINDA K. SCHNEIDER
Supervising Deputy Attorney General
3 MARICHELE S. TAHIMIC, State Bar No. 147392
Deputy Attorney General
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Telephone: (619) 645-3154
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8 Attorneys for Complainant

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. 3312

13 REEM TERESA NASSER
14 3121 Morning Way
La Jolla, CA 92037

A C C U S A T I O N

15 Pharmacy Technician Registration No. TCH
16 69031

17 Respondent.

18
19 Complainant alleges:

20 **PARTIES**

21 1. Virginia Herold (Complainant) brings this Accusation solely in her
22 official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer
23 Affairs.

24 2. On or about May 2, 2006, the Board of Pharmacy issued Pharmacy
25 Technician Registration Number TCH 69031 to Reem Teresa Nasser (Respondent). The
26 Pharmacy Technician Registration was in full force and effect at all times relevant to the charges
27 brought herein and will expire on July 31, 2009, unless renewed.

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2 JURISDICTION.

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

6 4. Section 4300 of the Code states:

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

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

11 "(1) Suspending judgment.

12 "(2) Placing him or her upon probation.

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

14 "(4) Revoking his or her license.

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

17 "...."

18 "(d) The board may initiate disciplinary proceedings to revoke or suspend any
19 probationary certificate of licensure for any violation of the terms and conditions of probation.

20 Upon satisfactory completion of probation, the board shall convert the probationary certificate to
21 a regular certificate, free of conditions.

22 "(e) The proceedings under this article shall be conducted in accordance with
23 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the Government Code,
24 and the board shall have all the powers granted therein. The action shall be final, except that the
25 propriety of the action is subject to review by the superior court pursuant to Section 1094.5 of
26 the Code of Civil Procedure."

27 5. Section 118 of the Code states in part:

28 "(b) The suspension, expiration, or forfeiture by operation of law of a license

1 issued by a board in the department, or its suspension, forfeiture, or cancellation by order of the
2 board or by order of a court of law, or its surrender without the written consent of the board,
3 shall not, during any period in which it may be renewed, restored, reissued, or reinstated, deprive
4 the board of its authority to institute or continue a disciplinary proceeding against the licensee
5 upon any ground provided by law or to enter an order suspending or revoking the license or
6 otherwise taking disciplinary action against the licensee on any such ground.

7 “(c) As used in this section, ‘board’ includes an individual who is authorized by any
8 provision of this code to issue, suspend, or revoke a license, and ‘license’ includes ‘certificate,’
9 ‘registration,’ and ‘permit.’”

10 STATUTORY PROVISIONS AND REGULATIONS

11 6. Section 4301 of the Code states:

12 “The board shall take action against any holder of a license who is guilty of
13 unprofessional conduct or whose license has been procured by fraud or misrepresentation or
14 issued by mistake. Unprofessional conduct shall include, but is not limited to, any of the
15 following:

16 “... ”

17 “(h) The administering to oneself, of any controlled substance, or the use of any
18 dangerous drug or of alcoholic beverages to the extent or in a manner as to be dangerous or
19 injurious to oneself, to a person holding a license under this chapter, or to any other person or to
20 the public, or to the extent that the use impairs the ability of the person to conduct with safety to
21 the public the practice authorized by the license.

22 “... ”

23 “(j) The violation of any of the statutes of this state, or any other state, or of the
24 United States regulating controlled substances and dangerous drugs.

25 “(k) The conviction of more than one misdemeanor or any felony involving the
26 use, consumption, or self-administration of any dangerous drug or alcoholic beverage, or any
27 combination of those substances.

28 “(l) The conviction of a crime substantially related to the qualifications, functions,

1 and duties of a licensee under this chapter. The record of conviction of a violation of Chapter 13
2 (commencing with Section 801) of Title 21 of the United States Code regulating controlled
3 substances or of a violation of the statutes of this state regulating controlled substances or
4 dangerous drugs shall be conclusive evidence of unprofessional conduct. In all other cases, the
5 record of conviction shall be conclusive evidence only of the fact that the conviction occurred.
6 The board may inquire into the circumstances surrounding the commission of the crime, in order
7 to fix the degree of discipline or, in the case of a conviction not involving controlled substances
8 or dangerous drugs, to determine if the conviction is of an offense substantially related to the
9 qualifications, functions, and duties of a licensee under this chapter. A plea or verdict of guilty
10 or a conviction following a plea of nolo contendere is deemed to be a conviction within the
11 meaning of this provision. The board may take action when the time for appeal has elapsed, or
12 the judgment of conviction has been affirmed on appeal or when an order granting probation is
13 made suspending the imposition of sentence, irrespective of a subsequent order under Section
14 1203.4 of the Penal Code allowing the person to withdraw his or her plea of guilty and to enter a
15 plea of not guilty, or setting aside the verdict of guilty, or dismissing the accusation, information,
16 or indictment.

17 "...."

18 7. Code section 4059(a) provides:

19 "A person may not furnish any dangerous drug, except upon the prescription of a
20 physician, dentist, podiatrist, optometrist, or veterinarian. A person any not furnish any
21 dangerous device, except upon the prescription of a physician, dentist, podiatrist, or
22 veterinarian."

23 8. Code section 4060 provides:

24 "No person shall possess any controlled substance, except that furnished to a
25 person upon the prescription of a physician, dentist, podiatrist, or veterinarian, or furnished
26 pursuant to a drug order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse
27 practitioner pursuant to Section 2836.1, or a physician assistant pursuant to Section 3502.1. This
28 section shall not apply to the possession of any controlled substance by a manufacturer,

1 wholesaler, pharmacy, physician, podiatrist, dentist, veterinarian, certified nurse-midwife, nurse
2 practitioner, or physician assistant, when in stock in containers correctly labeled with the name
3 and address of the supplier or producer.

4 "Nothing in this section authorizes a certified nurse-midwife, a nurse practitioner,
5 or a physician assistant to order his or her own stock of dangerous drugs and devices."

6 9. California Code of Regulations, title 16, section 1770, states:

7 "For the purpose of denial, suspension, or revocation of a personal or facility
8 license pursuant to Division 1.5 (commencing with Section 475) of the Business and Professions
9 Code, a crime or act shall be considered substantially related to the qualifications, functions or
10 duties of a licensee or registrant if to a substantial degree it evidences present or potential
11 unfitness of a licensee or registrant to perform the functions authorized by his license or
12 registration in a manner consistent with the public health, safety, or welfare."

13 10. Section 482 of the Code states:

14 "Each board under the provisions of this code shall develop criteria to evaluate
15 the rehabilitation of a person when:

16 "(a) Considering the denial of a license by the board under Section 480; or

17 "(b) Considering suspension or revocation of a license under Section 490.

18 "Each board shall take into account all competent evidence of rehabilitation
19 furnished by the applicant or licensee."

20 11. California Code of Regulations, title 16, section 1769(b) sets forth the
21 following criteria in evaluating the rehabilitation of a licensee:

22 "When considering the suspension or revocation of a facility or a personal license
23 on the ground that the licensee or the registrant has been convicted of a crime, the board, in
24 evaluating the rehabilitation of such person and his present eligibility for a license will consider
25 the following criteria:

26 "(1) Nature and severity of the act(s) or offense(s).

27 "(2) Total criminal record.

28 "(3) The time that has elapsed since commission of the act(s) or offense(s).

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"(4) Whether the licensee has complied with all terms of parole, probation, restitution or any other sanctions lawfully imposed against the licensee.

"(5) Evidence, if any, of rehabilitation submitted by the licensee."

DRUGS

12. Cocaine is a Schedule II controlled substance as designated by Health and Safety Code section 11055(b)(6), and is a dangerous drug pursuant to Business & Professions Code section 4022.

13. Marijuana is a Schedule I controlled substance as designated by Health and Safety Code section 11054(d)(13), and is a dangerous drug pursuant to Business & Professions Code section 4022.

14. Triazolam is a Schedule IV controlled substance as designated by Health and Safety Code section 11057(d)(30), and is a dangerous drug pursuant to Business & Professions Code section 4022.

COST RECOVERY

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

FIRST CAUSE FOR DISCIPLINE

(March 14, 2007 Conviction for DUI on December 13, 2006)

16. Respondent is subject to disciplinary action under Code sections 490 and 4301(l) for unprofessional conduct for the conviction of a crime substantially related to the qualifications, functions and duties of a registered pharmacy technician in that on March 14, 2007 in *People v. Reem Teresa Nasser*, San Diego Superior Court-North County Division Case No. CN223297, Respondent was convicted on her guilty plea of driving under the influence of alcohol with a blood alcohol content of 0.08% or greater, Vehicle Code section 23152(b).

17. The circumstances that led to the conviction were that on December 13,

1 2006, a California Highway Patrol officer saw that Respondent's vehicle weaving back and forth
2 in the number two lane of northbound South Coast Highway south of Encinitas Boulevard and
3 traveling at 37 mph in a 30-mph zone. As Respondent's vehicle continued to travel north, the
4 officer observed that Respondent flicked ashes from a lit cigarette out her window. Her vehicle
5 drove over the solid white line onto the right shoulder by about one foot before swerving back
6 into lane number two. After the officer made a traffic stop, he saw a blue glass pipe and a plastic
7 baggie containing marijuana between the two front seats. When the officer asked Respondent
8 about the marijuana, he detected the odor of alcohol on Respondent and noticed that
9 Respondent's eyes were red and watery and that her speech was slurred. When she exited her
10 vehicle, Respondent was unsteady. She did not successfully complete field sobriety tests.
11 Respondent was brought to the Vista Detention Facility where a breath sample was obtained.
12 The breath test results were 0.16% and 0.17%. When the officer removed the glass pipe and
13 marijuana from Respondent's car, the officer also located a green glass pipe on the right front
14 floorboard of the vehicle.

15 18. Respondent was charged with driving under the influence of alcohol and a
16 drug (Vehicle Code section 23152(a)), driving with a blood alcohol content of 0.08% or greater
17 (Vehicle Code section 23152(b)), and possession of marijuana while driving (Vehicle Code
18 section 23222(b)). On March 14, 2007, Respondent pled guilty to count two, driving with a
19 blood alcohol content of 0.08% or greater (Vehicle Code section 23152(b)). The other charges
20 were dismissed.

21 19. Respondent was sentenced to 3 years of summary probation, required to
22 pay \$1,800 in fines and ordered to complete a First Conviction Program.

23 SECOND CAUSE FOR DISCIPLINE

24 (Unprofessional Conduct-Use of an Alcoholic Beverage on December 13, 2006)

25 20. Respondent is subject to disciplinary action under Code section 4301(h)
26 for unprofessional conduct in that on December 13, 2006, she was driving under the influence of
27 alcohol with a blood alcohol content of 0.08% or greater, as more fully set forth in paragraphs
28 16-19 above.

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2 THIRD CAUSE FOR DISCIPLINE

3 (Unlawful Possession of Marijuana on December 13, 2006)

4 21. Respondent is subject to disciplinary action under Code sections 4301(j)
5 and 4060 in that on December 13, 2006, Respondent unlawfully possessed marijuana, a
6 controlled substance, as more fully set forth in paragraphs 16-19 above.

7 FOURTH CAUSE FOR DISCIPLINE

8 (Furnishing Marijuana Without a Prescription on December 13, 2006)

9 22. Respondent is subject to disciplinary action under Code sections 4301(j)
10 and 4059(a) for furnishing a controlled substance, marijuana, to herself without a prescription on
11 December 13, 2006, as more fully set forth in paragraphs 16-19 above.

12 FIFTH CAUSE FOR DISCIPLINE

13 (April 6, 2007 Conviction for Possession of Cocaine and DUI on March 18, 2007)

14 23. Respondent is subject to disciplinary action under Code sections 490 and
15 4301(l) for unprofessional conduct for the conviction of a crime substantially related to the
16 qualifications, functions and duties of a registered pharmacy technician in that on April 6, 2007
17 in *People v. Reem Teresa Nasser*, San Diego Superior Court-North County Division Case No.
18 CN226691, Respondent was convicted on her guilty plea to possession of a controlled substance
19 and driving under the influence of alcohol with alcohol content of 0.08% or greater, Vehicle
20 Code section 23152(b).

21 24. The circumstances that led to the conviction are that on March 18, 2007,
22 at about 0018 hours, a California Highway Patrol Officer was traveling westbound on Carlsbad
23 Village Drive in Carlsbad, California. The officer's attention was drawn to the Respondent's
24 vehicle behind him because its high beam headlights were shining in the officer's rear view
25 mirror but only one of the low beam headlights was on. The officer changed lanes and allowed
26 the Respondent's vehicle to pass him. The officer initiated a traffic stop. As Respondent's
27 vehicle pulled over to the right, its tires struck the raised curb. As the officer approached
28 Respondent's car, he saw Respondent shove a purse under the driver's seat. The officer smelled

1 the odor of alcohol and marijuana from the car. Respondent explained that her high beams were
2 on because one of her head lights was out. She was not able to locate her driver's license and
3 began looking around her car and moving papers around while her left hand was still shoving her
4 purse under her seat. The officer asked Respondent if her license was in the purse partially
5 under her seat. Respondent stated, "No, it's not in that purse. I have two purses and it's in the
6 other one." Respondent denied having consumed any alcohol or marijuana. When the officer
7 advised Respondent that he could smell marijuana, Respondent begged the officer to simply
8 write a "fix-it" ticket. After Respondent exited the car, the officer noted her unsteady gait, her
9 red eyes, the odor of burnt marijuana and her slurred speech.

10 25. The officer administered field sobriety tests which Respondent failed. The
11 officer administered breath tests with results of 0.124% and 0.115%. Respondent was
12 subsequently arrested. Respondent refused to allow the officer to place handcuffs around her
13 wrists. Respondent twisted to her left and stiffened her arms. Other officers came to assist when
14 Respondent continued to struggle with the arresting officers.

15 26. While searching Respondent, the officer found a folded piece of paper in
16 her left rear pocket with a substance that appeared to be cocaine. Respondent screamed from the
17 back seat of the patrol car that it was not hers. The officer found a multicolored glass marijuana
18 pipe in the purse Respondent was trying to shove under the driver's seat. Respondent denied the
19 pipe was hers. The officer also found a non-prescription bottle with 12 pills, later identified as
20 Triazolam. Respondent denied the pills were hers, stating there were other girls in the car that
21 night. The officer also located an Interim California Driver's License authorizing Respondent to
22 drive only to and from work or to and from a treatment program. It was issued five days before,
23 on March 13, 2007. Respondent had previously admitted she was coming from her boyfriend's
24 house in Occanside and was going to her friend's house in Carlsbad.

25 27. After chemical testing, it was determined that the folded piece of paper
26 found in Respondent's left pocket contained cocaine. The multi-colored marijuana pipe
27 contained some marijuana in its bowl, approximately 94.5 grams including the pipe.

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- 2 28. Respondent was charged with:
- 3 a. possession of a controlled substance, cocaine, in violation of Health and
- 4 Safety Code section 11350(a), a felony;
- 5 b. driving under the influence of alcohol/drugs with a prior DUI conviction
- 6 within 10 years in violation of Vehicle Code section 23152(a);
- 7 c. driving while having a blood alcohol content of 0.08% or greater with a
- 8 prior DUI conviction within 10 years in violation of Vehicle Code section 23152(b);
- 9 d. resisting an officer in violation of Penal Code section 148(a)(1);
- 10 e. possession of a designated controlled substance, triazolam, in violation of
- 11 Health and Safety Code section 11375(b)(2);
- 12 f. driving with a suspended license for a prior DUI conviction in violation of
- 13 Vehicle Code section 14601.2(a);
- 14 g. driving with a suspended license for test refusal in violation of Vehicle
- 15 Code section 14601.5(a);
- 16 h. possession of marijuana while driving a motor vehicle in violation of
- 17 Vehicle Code section 23222(b).

18 29. On April 6, 2007, Respondent was convicted on her plea of guilty to the

19 first and third charges, possession of a controlled substance, cocaine, in violation of Health and

20 Safety Code section 11350(a), and driving while having a blood alcohol content of 0.08% or

21 greater with a prior DUI conviction within 10 years in violation of Vehicle Code section

22 23152(b), respectively. The other charges were dismissed.

23 30. Respondent was sentenced to 3 years of formal probation, required to

24 serve 96 hours in jail, required to pay \$2,929 in fines and fees, and to complete a 20-day public

25 service program.

26 SIXTH CAUSE FOR DISCIPLINE

27 (Unprofessional Conduct-Use of Alcohol on March 18, 2007)

28 31. Respondent is subject to disciplinary action under Code section 4301(h)

1 for unprofessional conduct in that on March 18, 2007, she was driving under the influence of
2 alcohol with a blood alcohol content of 0.08% or greater, as more fully set forth in paragraphs
3 23-30 above.

4 SEVENTH CAUSE FOR DISCIPLINE

5 (Unlawful Possession of Controlled Substances on March 18, 2007)

6 32. Respondent is subject to disciplinary action under Code sections 4301(j)
7 and 4060 in that on March 18, 2007, Respondent unlawfully possessed marijuana, cocaine and
8 triazolam, all controlled substances, as more fully set forth in paragraphs 23-30, above.

9 EIGHTH CAUSE FOR DISCIPLINE

10 (Furnishing Controlled Substances Without a Prescription on March 18, 2007)

11 33. Respondent is subject to disciplinary action under Code sections 4301(j)
12 and 4059(a) for furnishing controlled substances to herself, specifically marijuana, cocaine and
13 triazolam, without a prescription on March 18, 2007, as more fully set forth in paragraphs 23-30.

14 NINTH CAUSE FOR DISCIPLINE

15 (Violation of Laws on March 18, 2007)

16 34. Respondent is subject to disciplinary action under Code section 4301(j)
17 for violating Health and Safety Code section 11350(a), possession of controlled a substance,
18 cocaine, and Vehicle Code section 23152(b), driving under the influence of alcohol with a blood
19 alcohol content of 0.08% or greater, as more fully set forth in paragraphs 23-30.

20 TENTH CAUSE FOR DISCIPLINE

21 (Unprofessional Conduct-Multiple Convictions Involving Consumption of
22 Alcoholic Beverages)

23 35. Respondent is subject to disciplinary action under Code section 4301(k)
24 for unprofessional conduct in that on March 14, 2007 and on April 6, 2007, Respondent was
25 convicted of driving under the influence of alcohol with a blood alcohol content of 0.08% or
26 greater.

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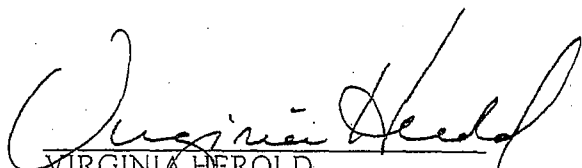
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PRAYER

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 69031, issued to Reem Teresa Nasser.
2. Ordering Reem Teresa Nasser 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: 6/12/09



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

SD2009803870

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