

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

In the Matter of the Statement of Issues
Against:

Case No. 4307

ALICE EILEEN WATCHORN

Pharmacy Technician Registration
Applicant

Respondent.

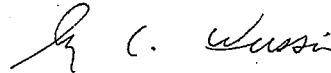
DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary 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 December 7, 2012.

It is so ORDERED on November 7, 2012.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA



By

STANLEY C. WEISSER
Board President

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In the Matter of the Statement of Issues
Against:
ALICE EILEEN WATCHORN
**Pharmacy Technician Registration
Applicant**

Respondent.

Case No. 4307
**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled proceedings that the following matters are true:

PARTIES

1. Virginia Herold (Complainant) is the Executive Officer of the Board of Pharmacy. She brought this action solely in her official capacity and is represented in this matter by Kamala D. Harris, Attorney General of the State of California, by Aspasia A. Papavassiliou, Deputy Attorney General.

2. Alice Eileen Watchorn (Respondent) is representing herself in this proceeding and has chosen not to exercise her right to be represented by counsel.

1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Respondent Alice Eileen Watchorn be issued a pharmacy
3 technician registration that will be immediately revoked. The revocation will be stayed and the
4 Respondent placed on five (5) years probation on the following terms and conditions.

5 **1. Certification Prior to Resuming Work**

6 Respondent shall be automatically suspended from working as a pharmacy technician until
7 she is certified as defined by Business and Professions Code section 4202(a)(4) and provides
8 satisfactory proof of certification to the board. Respondent shall not resume working as a
9 pharmacy technician until notified by the board. Failure to achieve certification within one (1)
10 year shall be considered a violation of probation. Respondent shall not resume working as a
11 pharmacy technician until notified by the board.

12 During suspension, respondent shall not enter any pharmacy area or any portion of any
13 other board licensed premises (wholesaler, veterinary food-animal drug retailer or any other
14 distributor of drugs) any drug manufacturer, or any other location where dangerous drugs and
15 devices or controlled substances are maintained. Respondent shall not do any act involving drug
16 selection, selection of stock, manufacturing, compounding or dispensing; nor shall respondent
17 manage, administer, or assist any licensee of the board. Respondent shall not have access to or
18 control the ordering, manufacturing or dispensing of dangerous drugs and devices or controlled
19 substances. Respondent shall not resume work until notified by the board.

20 Subject to the above restrictions, respondent may continue to own or hold an interest in any
21 licensed premises by the board in which she holds an interest at the time this decision becomes
22 effective unless otherwise specified in this order.

23 Failure to comply with this suspension shall be considered a violation of probation.

24 **2. Obey All Laws**

25 Respondent shall obey all state and federal laws and regulations.

26 Respondent shall report any of the following occurrences to the board, in writing, within
27 seventy-two (72) hours of such occurrence:

28 an arrest or issuance of a criminal complaint for violation of any provision of the

1 Pharmacy Law, state and federal food and drug laws, or state and federal controlled
2 substances laws;
3 a plea of guilty or nolo contendere in any state or federal criminal proceeding to any
4 criminal complaint, information or indictment;
5 a conviction of any crime;
6 discipline, citation, or other administrative action filed by any state or federal agency
7 which involves respondent's pharmacy technician registration or which is related to
8 the practice of pharmacy or the manufacturing, obtaining, handling, distributing,
9 billing, or charging for any drug, device or controlled substance.

10 Failure to timely report any such occurrence shall be considered a violation of probation.

11 **3. Report to the Board**

12 Respondent shall report to the board quarterly, on a schedule as directed by the board or its
13 designee. The report shall be made either in person or in writing, as directed. Among other
14 requirements, respondent shall state in each report under penalty of perjury whether there has
15 been compliance with all the terms and conditions of probation. Failure to submit timely reports
16 in a form as directed shall be considered a violation of probation. Any period(s) of delinquency
17 in submission of reports as directed may be added to the total period of probation. Moreover, if
18 the final probation report is not made as directed, probation shall be automatically extended until
19 such time as the final report is made and accepted by the board.

20 **4. Interview with the Board**

21 Upon receipt of reasonable prior notice, respondent shall appear in person for interviews
22 with the board or its designee, at such intervals and locations as are determined by the board or its
23 designee. Failure to appear for any scheduled interview without prior notification to board staff,
24 or failure to appear at two (2) or more scheduled interviews with the board or its designee during
25 the period of probation, shall be considered a violation of probation.

26 **5. Cooperate with Board Staff**

27 Respondent shall cooperate with the board's inspection program and with the board's
28 monitoring and investigation of respondent's compliance with the terms and conditions of her

1 probation. Failure to cooperate shall be considered a violation of probation.

2 **6. Notice to Employers**

3 During the period of probation, respondent shall notify all present and prospective
4 employers of the decision in case number 4307 and the terms, conditions and restrictions imposed
5 on respondent by the decision, as follows:

6 Within thirty (30) days of the effective date of this decision, and within fifteen (15) days of
7 respondent undertaking any new employment, respondent shall cause her direct supervisor,
8 pharmacist-in-charge (including each new pharmacist-in-charge employed during respondent's
9 tenure of employment) and owner to report to the board in writing acknowledging that the listed
10 individual(s) has/have read the decision in case number 4307 and the terms and conditions
11 imposed thereby. It shall be respondent's responsibility to ensure that her employer(s) and/or
12 supervisor(s) submit timely acknowledgement(s) to the board.

13 If respondent works for or is employed by or through a pharmacy employment service,
14 respondent must notify her direct supervisor, pharmacist-in-charge and owner at every pharmacy
15 of the terms and conditions of the decision in case number 4307 in advance of the respondent
16 commencing work at each pharmacy. A record of this notification must be provided to the board
17 upon request.

18 Furthermore, within thirty (30) days of the effective date of this decision, and within fifteen
19 (15) days of respondent undertaking any new employment by or through a pharmacy employment
20 service, respondent shall cause her direct supervisor with the pharmacy employment service to
21 report to the board in writing acknowledging that she has read the decision in case number 4307
22 and the terms and conditions imposed thereby. It shall be respondent's responsibility to ensure
23 that her employer(s) and/or supervisor(s) submit timely acknowledgment(s) to the board.

24 Failure to timely notify present or prospective employer(s) or to cause that/those
25 employer(s) to submit timely acknowledgements to the board shall be considered a violation of
26 probation.

27 "Employment" within the meaning of this provision shall include any full-time,
28 part-time, temporary or relief service or pharmacy management service as a pharmacy

1 technician or in any position for which a pharmacy technician license is a requirement
2 or criterion for employment, whether the respondent is considered an employee,
3 independent contractor or volunteer.

4 **7. Probation Monitoring Costs**

5 Respondent shall pay any costs associated with probation monitoring as determined by the
6 board each and every year of probation. Such costs shall be payable to the board on a schedule as
7 directed by the board or its designee. Failure to pay such costs by the deadline(s) as directed shall
8 be considered a violation of probation.

9 **8. Status of License**

10 Respondent shall, at all times while on probation, maintain an active, current pharmacy
11 technician license with the board, including any period during which suspension or probation is
12 tolled. Failure to maintain an active, current license shall be considered a violation of probation.

13 If respondent's pharmacy technician license expires or is cancelled by operation of law or
14 otherwise at any time during the period of probation, including any extensions thereof due to
15 tolling or otherwise, upon renewal or reapplication respondent's license shall be subject to all
16 terms and conditions of this probation not previously satisfied.

17 **9. License Surrender While on Probation/Suspension**

18 Following the effective date of this decision, should respondent cease work due to
19 retirement or health, or be otherwise unable to satisfy the terms and conditions of probation,
20 respondent may tender her pharmacy technician license to the board for surrender. The board or
21 its designee shall have the discretion whether to grant the request for surrender or take any other
22 action it deems appropriate and reasonable. Upon formal acceptance of the surrender of the
23 license, respondent will no longer be subject to the terms and conditions of probation. This
24 surrender constitutes a record of discipline and shall become a part of the respondent's license
25 history with the board.

26 Upon acceptance of the surrender, respondent shall relinquish her pharmacy technician
27 license to the board within ten (10) days of notification by the board that the surrender is
28 accepted. Respondent may not reapply for any license, permit, or registration from the board for

1 three (3) years from the effective date of the surrender. Respondent shall meet all requirements
2 applicable to the license sought as of the date the application for that license is submitted to the
3 board.

4 **10. Notification of a Change in Name, Residence Address, Mailing Address or**
5 **Employment**

6 Respondent shall notify the board in writing within ten (10) days of any change of
7 employment. Said notification shall include the reasons for leaving, the address of the new
8 employer, the name of the supervisor and owner, and the work schedule if known. Respondent
9 shall further notify the board in writing within ten (10) days of a change in name, residence
10 address and mailing address, or phone number.

11 Failure to timely notify the board of any change in employer(s), name(s), address(es), or
12 phone number(s) shall be considered a violation of probation.

13 **11. Violation of Probation**

14 If a respondent has not complied with any term or condition of probation, the board shall
15 have continuing jurisdiction over respondent, and probation shall automatically be extended, until
16 all terms and conditions have been satisfied or the board has taken other action as deemed
17 appropriate to treat the failure to comply as a violation of probation, to terminate probation, and
18 to impose the penalty that was stayed.

19 If respondent violates probation in any respect, the board, after giving respondent notice
20 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that
21 was stayed. Notice and opportunity to be heard are not required for those provisions stating that a
22 violation thereof may lead to automatic termination of the stay and/or revocation of the license. If
23 a petition to revoke probation or an accusation is filed against respondent during probation, the
24 board shall have continuing jurisdiction, and the period of probation shall be automatically
25 extended until the petition to revoke probation or accusation is heard and decided.

26 **12. Completion of Probation**

27 Upon written notice by the board indicating successful completion of probation,
28 respondent's pharmacy technician license will be fully restored.

1 **13. No Ownership of Licensed Premises**

2 Respondent shall not own, have any legal or beneficial interest in, or serve as a manager,
3 administrator, member, officer, director, trustee, associate, or partner of any business, firm,
4 partnership, or corporation currently or hereinafter licensed by the board. Respondent shall sell
5 or transfer any legal or beneficial interest in any entity licensed by the board within ninety (90)
6 days following the effective date of this decision and shall immediately thereafter provide written
7 proof thereof to the board. Failure to timely divest any legal or beneficial interest(s) or provide
8 documentation thereof shall be considered a violation of probation.

9 **14. Attend Substance Abuse Recovery Relapse Prevention and Support Groups**

10 Within thirty (30) days of the effective date of this decision, respondent shall begin regular
11 attendance at a recognized and established substance abuse recovery support group in California,
12 (e.g., Alcoholics Anonymous, Narcotics Anonymous, etc.) which has been approved by the board
13 or its designee. Respondent must attend at least one group meeting per week unless otherwise
14 directed by the board or its designee. Respondent shall continue regular attendance and submit
15 signed and dated documentation confirming attendance with each quarterly report for the duration
16 of probation. Failure to attend or submit documentation thereof shall be considered a violation of
17 probation.

18 **15. Random Drug Screening**

19 Respondent, at her own expense, shall participate in random testing, including but not
20 limited to biological fluid testing (urine, blood), breathalyzer, hair follicle testing, or other drug
21 screening program as directed by the board or its designee. Respondent may be required to
22 participate in testing for the entire probation period and the frequency of testing will be
23 determined by the board or its designee. At all times respondent shall fully cooperate with the
24 board or its designee, and shall, when directed, submit to such tests and samples for the detection
25 of alcohol, narcotics, hypnotics, dangerous drugs or other controlled substances as the board or its
26 designee may direct. Failure to timely submit to testing as directed shall be considered a violation
27 of probation. Upon request of the board or its designee, respondent shall provide documentation
28 from a licensed practitioner that the prescription for a detected drug was legitimately issued and is

1 a necessary part of the treatment of the respondent. Failure to timely provide such documentation
2 shall be considered a violation of probation. Any confirmed positive test for alcohol or for any
3 drug not lawfully prescribed by a licensed practitioner as part of a documented medical treatment
4 shall be considered a violation of probation and shall result in the automatic suspension of work
5 by respondent. Respondent may not resume work as a pharmacy technician until notified by the
6 board in writing.

7 During suspension, respondent shall not enter any pharmacy area or any portion of or any
8 other board licensed premises (wholesaler, veterinary food-animal drug retailer or any other
9 distributor of drugs) any drug manufacturer, or any other location where dangerous drugs and
10 devices or controlled substances are maintained. Respondent shall not do any act involving drug
11 selection, selection of stock, manufacturing, compounding or dispensing; nor shall respondent
12 manage, administer, or assist any licensee of the board. Respondent shall not have access to or
13 control the ordering, manufacturing or dispensing of dangerous drugs and devices or controlled
14 substances. Respondent shall not resume work until notified by the board.

15 Respondent shall not direct, control or perform any aspect of the practice of pharmacy.
16 Subject to the above restrictions, respondent may continue to own or hold an interest in any
17 licensed premises in which she holds an interest at the time this decision becomes effective unless
18 otherwise specified in this order.

19 Failure to comply with this suspension shall be considered a violation of probation.

20 **16. Work Site Monitor**

21 Within ten (10) days of the effective date of this decision, respondent shall identify a work
22 site monitor, for prior approval by the board, who shall be responsible for supervising respondent
23 during working hours. Respondent shall be responsible for ensuring that the work site monitor
24 reports in writing to the board quarterly. Should the designated work site monitor determine at
25 any time during the probationary period that respondent has not maintained sobriety, she shall
26 notify the board immediately, either orally or in writing as directed. Should respondent change
27 employment, a new work site monitor must be designated, for prior approval by the board, within
28 ten (10) days of commencing new employment. Failure to identify an acceptable initial or

1 replacement work site monitor, or to ensure quarterly reports are submitted to the board, shall be
2 considered a violation of probation.

3 **17. Notification of Departure**

4 Prior to leaving the probationary geographic area designated by the board or its designee for
5 a period greater than twenty-four (24) hours, respondent shall notify the board verbally and in
6 writing of the dates of departure and return. Failure to comply with this provision shall be
7 considered a violation of probation.

8 **18. Abstain from Drugs and Alcohol Use**

9 Respondent shall completely abstain from the possession or use of alcohol, controlled
10 substances, dangerous drugs and their associated paraphernalia except when the drugs are
11 lawfully prescribed by a licensed practitioner as part of a documented medical treatment. Upon
12 request of the board or its designee, respondent shall provide documentation from the licensed
13 practitioner that the prescription for the drug was legitimately issued and is a necessary part of the
14 treatment of the respondent. Failure to timely provide such documentation shall be considered a
15 violation of probation. Respondent shall ensure that she is not in the same physical location as
16 individuals who are using illicit substances even if respondent is not personally ingesting the
17 drugs. Any possession or use of alcohol, controlled substances, or their associated paraphernalia
18 not supported by the documentation timely provided, and/or any physical proximity to persons
19 using illicit substances, shall be considered a violation of probation.

20 **19. Prescription Coordination and Monitoring of Prescription Use**

21 Within thirty (30) days of the effective date of this decision, respondent shall submit to the
22 board, for its prior approval, the name and qualifications of a single physician, nurse practitioner,
23 physician assistant, or psychiatrist of respondent's choice, who shall be aware of the respondent's
24 history with the use of methamphetamine and who will coordinate and monitor any prescriptions
25 for respondent for dangerous drugs, controlled substances or mood-altering drugs. The approved
26 practitioner shall be provided with a copy of the board's Statement of Issues and decision. A
27 record of this notification must be provided to the board upon request. Respondent shall sign a
28 release authorizing the practitioner to communicate with the board about respondent's

1 treatment(s). The coordinating physician, nurse practitioner, physician assistant, or psychiatrist
2 shall report to the board on a quarterly basis for the duration of probation regarding respondent's
3 compliance with this condition. If any substances considered addictive have been prescribed, the
4 report shall identify a program for the time limited use of any such substances. The board may
5 require that the single coordinating physician, nurse practitioner, physician assistant or
6 psychiatrist be a specialist in addictive medicine, or consult a specialist in addictive medicine.
7 Should respondent, for any reason, cease supervision by the approved practitioner, respondent
8 shall notify the board immediately and, within thirty (30) days of ceasing treatment, submit the
9 name of a replacement physician, nurse practitioner, physician assistant, or psychiatrist of
10 respondent's choice to the board or its designee for its prior approval. Failure to timely submit
11 the selected practitioner or replacement practitioner to the board for approval, or to ensure the
12 required reporting thereby on the quarterly reports, shall be considered a violation of probation.

13 If at any time an approved practitioner determines that respondent is unable to practice
14 safely or independently as a pharmacist technician, the practitioner shall notify the board
15 immediately by telephone and follow up by written letter within three (3) working days. Upon
16 notification from the board or its designee of this determination, respondent shall be
17 automatically suspended and shall not resume practice until notified by the board that practice
18 may be resumed.

19 During suspension, respondent shall not enter any pharmacy area or any portion of the
20 licensed premises of a wholesaler, veterinary food-animal drug retailer or any other distributor of
21 drugs which is licensed by the board, or any manufacturer, or where dangerous drugs and devices
22 or controlled substances are maintained. Respondent shall not practice as a pharmacy technician
23 nor do any act involving drug selection, selection of stock, manufacturing, compounding,
24 dispensing or patient consultation; nor shall respondent manage, administer, or be a consultant to
25 any licensee of the board, or have access to or control the ordering, manufacturing or dispensing
26 of dangerous drugs and controlled substances. Respondent shall not resume practice until
27 notified by the board.

28 During suspension, Respondent shall not perform the duties of a pharmacy technician or a

1 designated representative for any entity licensed by the board.

2 Failure to comply with this suspension shall be considered a violation of probation.

3 ACCEPTANCE

4 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
5 stipulation and the effect it will have on my application for a pharmacy technician registration. I
6 enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and
7 intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

8
9 DATED: 9-11-12 
10 ALICE EILEEN WATCHORN
11 Respondent

12 ENDORSEMENT

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

15
16 Dated: 9-11-2012

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
DIANN SOKOLOFF
Supervising Deputy Attorney General



ASPASIA A. PAPA VASSILIOU
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Statement of Issues No. 4307

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Case No. 4307

STATEMENT OF ISSUES

Complainant alleges:

PARTIES

1. Virginia Herold (Complainant) brings this Statement of Issues solely in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.
2. On or about July 8, 2011, the Board of Pharmacy, Department of Consumer Affairs received an application for a Pharmacy Technician Registration from Alice Eileen Watchorn (Respondent). On or about June 23, 2011, Respondent certified under penalty of perjury to the truthfulness of all statements, answers, and representations in the application. The Board denied the application on April 2, 2012.

JURISDICTION

3. This Statement of Issues is brought before the Board of Pharmacy (Board),

1 Department of Consumer Affairs, under the authority of the following laws. All section
2 references are to the Business and Professions Code unless otherwise indicated.

3 4. Section 480 of the Code states, in pertinent part:

4 "(a) A board may deny a license regulated by this code on the grounds that the applicant has
5 one of the following:

6 "(1) Been convicted of a crime. A conviction within the meaning of this section means a
7 plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action that a
8 board is permitted to take following the establishment of a conviction may be taken when the
9 time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when
10 an order granting probation is made suspending the imposition of sentence, irrespective of a
11 subsequent order under the provisions of Section 1203.4 of the Penal Code.

12 ...

13 "(3) (A) Done any act that if done by a licentiate of the business or profession in question,
14 would be grounds for suspension or revocation of license.

15 ...

16 "(c) A board may deny a license regulated by this code on the ground that the applicant
17 knowingly made a false statement of fact required to be revealed in the application for the
18 license."

19 5. Section 490 of the Code provides that a board may suspend or revoke a license on the
20 ground that the licensee has been convicted of a crime substantially related to the qualifications,
21 functions, or duties of the business or profession for which the license was issued.

22 6. Section 4301, subdivision (h), of the Code provides that the Board shall take action
23 against a licensee for the dangerous use of a controlled substance.

24 7. Section 4301, subdivision (j), of the Code provides that the Board shall take action
25 against a licensee for violation of any of the statutes of this state, of any other state, or of the
26 United States regulating controlled substances and dangerous drugs.

27 8. Section 4301, subdivision (l), of the Code provides that the Board shall take action
28 against a licensee for conviction of a crime substantially related to the qualifications, functions,

1 and duties of the licensee.

2 **FIRST CAUSE FOR DENIAL OF APPLICATION**

3 **(Criminal Conviction)**

4 **(Bus. & Prof. Code § 480, subd. (a)(1))**

5 9. Respondent's application for a pharmacy technician registration is subject to denial
6 under Code section 480, subdivision (a)(1) (Criminal Conviction) because on or about October
7 17, 2007, in Sonoma County Superior Court Case No. SCR511901, *People of the State of*
8 *California v. Alice Eileen Watchorn*, Respondent pled no contest to and was convicted of
9 violating Health and Safety Code section 11377, subdivision (b) (Possession of a Controlled
10 Substance) and Penal Code section 273a, subdivision (b) (Willful Cruelty to a Child). On or
11 about December 20, 2007, Respondent was placed on a four-year term of probation for the
12 offenses.¹

13 10. The circumstances leading to Respondent's conviction were as follows:

14 (a) On or about April 20, 2007, the Sonoma County Sheriff's Office received a call from
15 a preschool administrator regarding an abusive parent. Based on an investigation the same day,
16 Respondent's four children, ranging in ages from three to nine, were taken into custody under
17 Welfare and Institutions Code section 300 (Juvenile Court Jurisdiction over Abused Child).

18 (b) On or about April 23, 2007, a sheriff's deputy went to Respondent's home to serve a
19 protective order for the preschool administrator who had reported Respondent. While the deputy
20 was at Respondent's home, Respondent displayed symptoms of being under the influence of
21 methamphetamine. Respondent then admitted using the drug, and the deputy found a bag of
22 methamphetamine and a pipe for smoking methamphetamine in Respondent's purse.

23 **SECOND CAUSE FOR DENIAL OF APPLICATION**

24 **(Conduct Grounds for License Discipline)**

25 **(Bus. & Prof. Code § 480, subd. (a)(3)(A))**

26 11. Respondent's application for a pharmacy technician registration is subject to denial
27 under Code section 480, subdivision (a)(3)(A) (Act Grounds for License Discipline) because

28 ¹ Respondent's petition for early termination of probation was granted on or about
December 22, 2010 and the case was dismissed under Penal Code section 1203.4 on or about
January 25, 2011.

1 Respondent's criminal conviction described above would have subjected a licensee to discipline
2 under Code sections 490 (Criminal Conviction) and 4301, subdivision (l) (Criminal Conviction).
3 In addition, the conviction for possession of a controlled substance would have subjected a
4 licensee to discipline under Code section 4301, subdivision (j) (Violation of Statute Regarding
5 Controlled Substance), while the circumstances leading to that conviction would have subjected a
6 licensee to discipline under Code section 4301, subdivision (h) (Dangerous Use of Controlled
7 Substance).

8 **THIRD CAUSE FOR DENIAL OF APPLICATION**
9 **(False Statement in Application)**
10 **(Bus. & Prof. Code § 480, subd. (c))**

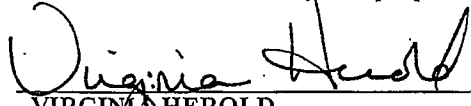
11 12. Respondent's application for a pharmacy technician registration is subject to denial
12 under Code section 480, subdivision (c) (False Statement in Application) because in her
13 application, she failed to reveal her criminal conviction described in paragraph 9 above.
14 Respondent answered "No" to Question Number 6, which asked, "Have you ever been convicted
15 of or pled no contest to a violation of any law of a foreign country, the United States or any state
16 laws or local ordinances? You must include all misdemeanor and felony convictions, regardless
17 of the age of the conviction, including those which have been set aside under Penal Code section
18 1203.4."

19 **PRAYER**

20 THEREFORE, Complainant requests that a hearing be held on the matters alleged in this
21 Statement of Issues, and that following the hearing, the Board of Pharmacy issue a decision:

- 22 1. Denying the application of Alice Eileen Watchorn for a Pharmacy Technician
23 Registration;
24 2. Taking such other and further action as deemed necessary and proper.

25 DATED: 8/14/12


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

SF2012204647