

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

In the Matter of the Statement of Issues  
Against:

VANIA WILLEEN BANKS

Pharmacy Technician Registration Applicant,

Respondent.

Case No. 5156

OAH No. 2014100599

**DECISION AND ORDER**

The attached Proposed Decision of the Administrative Law Judge is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on September 4, 2015.

It is so ORDERED on August 5, 2015.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA



By

\_\_\_\_\_  
Amy Gutierrez, Pharm.D.  
Board President

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**PROPOSED DECISION**

Administrative Law Judge Thomas Heller, State of California, Office of Administrative Hearings, heard this matter in Los Angeles, California on May 28, 2015.

Zachary Gidding, Law Student, under the supervision of Bora Song, Deputy Attorney General, represented complainant Virginia Herold, Executive Officer, Board of Pharmacy (Board), Department of Consumer Affairs.

Respondent Vania Willeen Banks represented herself.

The matter was submitted on May 28, 2015.

**REDACTION OF PRIVATE INFORMATION**

After submission of the matter, the Administrative Law Judge redacted Exhibit B to obscure the dates of birth of respondent and two other people.

**FACTUAL FINDINGS**

*Parties and Jurisdiction*

1. Respondent submitted a Pharmacy Technician Registration application to the Board, dated September 4, 2013.<sup>1</sup> The Board denied the application on February 26, 2014.

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<sup>1</sup> Complainant made an oral motion at the hearing to amend page 5, line 8 of the Statement of Issues to read "September 4, 2013," instead of "September 14, 2013," which was granted.

2. On August 12, 2014, complainant filed a Statement of Issues, which alleges various grounds to deny the application, including: (i) convictions of substantially related crimes; (ii) knowingly making a false statement of fact on respondent's application; (iii) acts involving dishonesty, fraud, or deceit; and (iv) acts warranting denial of licensure. Complainant filed the Statement of Issues in her official capacity as Executive Officer of the Board.

3. Complainant served the Statement of Issues on respondent on August 29, 2014, and respondent submitted a Request for Hearing, dated September 26, 2014.

#### *Respondent's Convictions*

4. On December 1, 2010, in the Superior Court of California, County of San Bernardino, Case No. 10556VB, respondent was convicted, following a jury trial, of one misdemeanor count of displaying an unauthorized disabled person's placard (Veh. Code, § 4461, subd. (c).) On December 8, 2010, the court withheld pronouncement of judgment and placed respondent on Conditional and Revocable Release for 36 months on various terms, including that she complete 175 hours in a work sentence program in lieu of a \$1,781 fine.

5. On January 26, 2012, in the Superior Court of California, County of San Bernardino, Case No. MWV1103070, respondent was convicted, based on her plea of nolo contendere, of one misdemeanor count of issuing or delivering a check without sufficient funds with intent to defraud (Pen. Code, § 476a.)<sup>2</sup> The court withheld pronouncement of judgment and placed respondent on Conditional and Revocable Release for 24 months, on various terms, including that she serve two days in jail (with credit for two days), and pay court fines, fees, and assessments totaling \$689.

6. ° Respondent's 2010 conviction arose from her improper use of her mother's disabled person's placard in January 2010, in a parking spot near Chaffey College in Rancho Cucamonga, California. Respondent's 2012 conviction arose from her attempt to cash four fraudulent money orders totaling \$3,700 in July 2011, at a Chase Bank in the same city. Respondent was looking for employment on Craigslist, and submitted her résumé to several companies. She received a reply from an unknown company that sent her four \$925 money orders, which she was supposed to cash and send to an address in Nigeria, keeping \$300 for herself. Respondent knew or suspected that the money orders were fraudulent, based on respondent's receipt of a similar fraudulent check the month before under similar circumstances. Nonetheless, respondent tried to cash the money orders, first at a check cashing business, and then at Chase Bank, where she was arrested.

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<sup>2</sup> The Statement of Issues incorrectly alleges that respondent was convicted of violating Penal Code section 476, rather than section 476a. Penal Code section 476 concerns forgery, which is not the crime of which respondent was convicted.

7. Respondent told the police that she tried to cash the money orders because she was unemployed and needed the money. At the hearing, respondent attributed her crimes to youthful, "naïve-minded" mistakes, and stated that she did not think through her crimes before committing them. She expressed remorse for committing her crimes, and testified that she is now trustworthy.

#### *Respondent's Application*

8. In her September 4, 2013 Pharmacy Technician Registration application, respondent certified under penalty of perjury that all statements, answers and representations made in her application were true and accurate, and also certified that she had read all of the instructions for the application. Question number seven on the application asked, "Have you ever been convicted of any crime in any state, the USA and its territories, military court or foreign country?" Respondent answered "No." (Ex. 2.)

9. Respondent's answer was false, given the convictions described above. In explanation, respondent testified that she believed that her past record was not relevant, and did not need to be disclosed, based on a background screening by Everest College, her pharmacy technician school. Respondent reasoned that if Everest College allowed her to enroll in pharmacy technician school after a background screening, then her criminal convictions were not relevant to licensure. But nothing about the question suggested that she could omit disclosing any criminal conviction. The question is short and simply phrased, and even includes the explicit instruction: "Check the box next to 'Yes' if, you have ever been convicted or plead guilty to any crime." (Ex. 2.)

#### *Other Evidence*

10. In February 2012, respondent was found to be in violation of probation regarding her 2010 conviction, due to her failure to complete her court-ordered community service. The court revoked, reinstated, and extended her probation until February 3, 2015, and required respondent to complete her community service by June 2012. On September 30, 2013, respondent was found to be in violation of probation regarding both of her convictions, due to her failure to complete community service on her 2010 conviction, and her failure to pay court-ordered fines, fees, and assessments on her 2012 conviction. The court revoked, reinstated, and extended respondent's probation in both cases until September 30, 2016, and imposed a \$1,781 fine in lieu of community service on her 2010 conviction. The court also placed respondent on a payment plan, and respondent is currently paying \$40 per month installments on the fine associated with her 2010 conviction. She still owes over \$1,000 on that case, and the \$654 in fines, fees, and assessments for her 2012 conviction will become payable in \$40 per month installments beginning in 2017.

11. Respondent completed her pharmacy technician training at Everest College, and received good grades. She works as a cashier at a Jack-in-the-Box restaurant, but is currently on leave, because she gave birth to a son a few weeks before the hearing. She also

processes checks for her boyfriend's real estate property management business. Her boyfriend, Robert Gonzales, testified that respondent feels remorse for her crimes, is loyal and trustworthy, and works with integrity in all respects.

12. Respondent is 25 years old and lives with her boyfriend and son. Respondent testified that a pharmacy technician job is her "calling," and that she would be dedicated and trustworthy in that position. To supplement respondent's testimony, she provided a favorable pharmacy technician externship evaluation, and favorable reference letters from two Everest College representatives. Brian Lyons, the Pharmacy Technician Program Director, highly recommended respondent, and stated that respondent has learned from her mistakes. Ethel Johnson, the Career Services Representative, stated that respondent is professional and well-prepared to be a pharmacy technician.

13. Antony Ngondara, a supervising inspector for the Board, testified about the functions and duties of a pharmacy technician. He stressed the importance of honesty in that position, due in particular to a technician's frequent handling of controlled substances and receipt of confidential medical information.

#### LEGAL CONCLUSIONS

1. Respondent bears the burden of proving that she meets all prerequisites necessary for the requested license. (See *Breakzone Billiards v. City of Torrance* (2000) 81 Cal.App.4th 1205, 1221.) This burden of proof requires proof by a preponderance of the evidence. (See Evid. Code, § 115.)

2. The Statement of Issues alleges that respondent's convictions are grounds for denial of her pharmacy technician registration application. The Board may deny respondent's application if she has been convicted of a crime that is "substantially related to the qualifications, functions, or duties" of a pharmacy technician. (Bus. & Prof. Code, §§ 480, subd. (a)(1), 481.)<sup>3</sup> A crime is deemed "substantially related" to a pharmacy technician's qualifications, functions or duties "if to a substantial degree it evidences present or potential unfitness of a licensee or registrant to perform the functions authorized by his license or registration in a manner consistent with the public health, safety, or welfare." (Cal. Code Regs., tit. 16, § 1770.)

3. The Board may also deny an application for a pharmacy technician registration if an applicant "knowingly made a false statement of fact that is required to be revealed in the application for the license," or has "[d]one any act involving dishonesty, fraud, or deceit with the intent to substantially benefit himself or herself or another, or substantially injure another." (§ 480, subs. (a)(2), (d).) In addition, the Board may deny an application if the applicant has "[d]one any act that if done by a licentiate of the business or profession in

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<sup>3</sup> All further statutory references are to the Business and Professions Code, unless otherwise indicated.

question, would be grounds for suspension or revocation of license.” (*Id.*, subd. (a)(3)(A).) Acts that are grounds for suspension or revocation of a pharmacy technician registration include conviction of a “substantially related” crime and acts of “moral turpitude, dishonesty, fraud, deceit, or corruption,” among others. (§ 4301, subs. (f), (l).)

4. There is cause to deny respondent’s application for conviction of a crime that is “substantially related to the qualifications, functions or duties” of a pharmacy technician. (§§ 480, subd. (a)(1), 481.) Respondent was convicted of two crimes involving dishonesty, and honesty and integrity are essential qualities of a pharmacy technician. While respondent’s 2010 conviction alone may not evidence respondent’s dishonesty to a “substantial degree,” her 2012 conviction does, and her two convictions together are evidence to a “substantial degree” of her “present or potential unfitness . . . to perform the functions” of a pharmacy technician. (Cal. Code Regs., tit. 16, § 1770.)

5. There is also cause to deny respondent’s application because she “knowingly made a false statement of fact” that was required to be revealed in her application. (§ 480, subd. (d).) The application included a question asking whether respondent had ever been convicted of any crime, and respondent answered no, despite knowing that she had. Respondent’s explanation that she thought her criminal background did not need to be disclosed was unpersuasive, and had no basis in the question itself or the instructions accompanying it.

6. In addition, there is cause to deny respondent’s application because she has done an act “involving dishonesty, fraud, or deceit with the intent to substantially benefit . . . herself . . .” (§ 480, subd. (a)(2).) Respondent’s 2012 conviction in particular involved an attempt to cash fraudulent checks with the intent to profit substantially from that act.

7. Finally, there is cause to deny respondent’s application because she has committed acts that would be grounds for suspension or revocation of a pharmacy technician registration. (§ 480, subd. (a)(3).) Respondent has committed “substantially related” crimes and acts involving “dishonesty [and] fraud,” as described in Legal Conclusions 4, 5, and 6. (§ 4301, subs. (f), (l).)

8. The Board has adopted criteria to determine if an applicant is sufficiently rehabilitated to justify licensure, when cause to deny an application has otherwise been established. The criteria that the Board will consider are:

- (1) The nature and severity of the act(s) or offense(s) under consideration as grounds for denial.
- (2) Evidence of any act(s) committed subsequent to the act(s) or crime(s) under consideration as grounds for denial under Section 480 of the Business and Professions Code.

- (3) The time that has elapsed since commission of the act(s) or crime(s) referred to in subdivision (1) or (2).
- (4) Whether the applicant has complied with any terms of parole, probation, restitution or any other sanctions lawfully imposed against the applicant.
- (5) Evidence, if any, of rehabilitation submitted by the applicant. (Cal. Code Regs., tit. 16, § 1769, subd. (b).)

9. There is insufficient evidence that respondent is rehabilitated at this time. Respondent's last conviction occurred over three years ago, but respondent is still on probation for that conviction and her 2010 conviction. In addition, respondent has violated her probation on two occasions, and has not fully paid the fines, fees, and assessments imposed against her. Respondent's crimes were dishonest in nature, and her 2012 conviction for issuing checks with intent to defraud in particular raises concerns about her honesty and integrity. Her failure to disclose her convictions to the Board compounds those concerns. To respondent's credit, she has been gainfully employed since her convictions, did well in her pharmacy technician education, and appears to have a stable family life. But those positive steps toward rehabilitation are undermined by other evidence in the record showing that her rehabilitation is incomplete.

10. Considering these facts and the totality of the record, there is insufficient evidence of respondent's present honesty, integrity, and full rehabilitation to support issuance of the requested pharmacy technician registration to respondent, either on a probationary or unrestricted basis. Therefore, respondent has not carried her burden of proving that she meets all of the prerequisites for issuance of the requested registration.

#### ORDER

Respondent Vania Willeen Banks' application for a pharmacy technician registration is denied.

DATED: June 23, 2015



THOMAS HELLER  
Administrative Law Judge  
Office of Administrative Hearings

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

11 In the Matter of the Statement of Issues  
Against:

Case No. 5156

12 **VANIA WILLEEN BANKS**

**STATEMENT OF ISSUES**

13 Pharmacy Technician Registration Applicant

14 Respondent.  
15

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Virginia Herold (Complainant) brings this Statement of Issues solely in her official  
20 capacity as the Executive Officer of the Board of Pharmacy (Board), Department of Consumer  
21 Affairs.

22 2. On or about September 9, 2013, the Board received an application for a Pharmacy  
23 Technician Registration from Vania Willeen Banks (Respondent). On or about September 4,  
24 2013, Respondent certified under penalty of perjury to the truthfulness of all statements, answers,  
25 and representations in the application. The Board denied the application on February 26, 2014.

26 **JURISDICTION**

27 3. This Statement of Issues is brought before the Board under the authority of the  
28 following laws.



**STATUTORY PROVISIONS**

1  
2 4. Business and Professions Code section 480<sup>1</sup> states, in pertinent part:

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

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

12 (2) Done any act involving dishonesty, fraud, or deceit with the intent to  
13 substantially benefit himself or herself or another, or substantially injure another.

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

16 (B) The board may deny a license pursuant to this subdivision only if the  
17 crime or act is substantially related to the qualifications, functions, or duties of the  
18 business or profession for which application is made.

19 (b) Notwithstanding any other provision of this code, no person shall be  
20 denied a license solely on the basis that he or she has been convicted of a felony if he  
21 or she has obtained a certificate of rehabilitation under Chapter 3.5 (commencing with  
22 Section 4852.01) of Title 6 of Part 3 of the Penal Code or that he or she has been  
23 convicted of a misdemeanor if he or she has met all applicable requirements of the  
24 criteria of rehabilitation developed by the board to evaluate the rehabilitation of a  
25 person when considering the denial of a license under subdivision (a) of Section 482.

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

5. Section 490 states, in pertinent part:

(a) In addition to any other action that a board is permitted to take  
against a licensee, a board may suspend or revoke a license on the ground that the  
licensee has been convicted of a crime, if the crime is substantially related to the  
qualifications, functions, or duties of the business or profession for which the license  
was issued.

(b) Notwithstanding any other provision of law, a board may exercise  
any authority to discipline a licensee for conviction of a crime that is independent of  
the authority granted under subdivision (a) only if the crime is substantially related to  
the qualifications, functions, or duties of the business or profession for which the  
licensee's license was issued.

<sup>1</sup> All further statutory references are to the Business and Professions Code unless otherwise indicated.

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

8  
9  
10 6. Section 4301 states, in pertinent part:

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

15 ...  
16 (f) The commission of any act involving moral turpitude, dishonesty,  
17 fraud, deceit, or corruption, whether the act is committed in the course of relations as  
18 a licensee or otherwise, and whether the act is a felony or misdemeanor or not.

19 ...  
20 (l) The conviction of a crime substantially related to the qualifications,  
21 functions, and duties of a licensee under this chapter. The record of conviction of a  
22 violation of Chapter 13 (commencing with Section 801) of Title 21 of the United  
23 States Code regulating controlled substances or of a violation of the statutes of this  
24 state regulating controlled substances or dangerous drugs shall be conclusive evidence  
25 of unprofessional conduct. In all other cases, the record of conviction shall be  
26 conclusive evidence only of the fact that the conviction occurred. The board may  
27 inquire into the circumstances surrounding the commission of the crime, in order to  
28 fix the degree of discipline or, in the case of a conviction not involving controlled  
substances or dangerous drugs, to determine if the conviction is of an offense  
substantially related to the qualifications, functions, and duties of a licensee under this  
chapter. A plea or verdict of guilty or a conviction following a plea of nolo  
contendere is deemed to be a conviction within the meaning of this provision. The  
board may take action when the time for appeal has elapsed, or the judgment of  
conviction has been affirmed on appeal or when an order granting probation is made  
suspending the imposition of sentence, irrespective of a subsequent order under  
Section 1203.4 of the Penal Code allowing the person to withdraw his or her plea of  
guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or  
dismissing the accusation, information, or indictment.

29 ...  
30 (o) Violating or attempting to violate, directly or indirectly, or assisting  
31 in or abetting the violation of or conspiring to violate any provision or term of this  
32 chapter or of the applicable federal and state laws and regulations governing  
33 pharmacy, including regulations established by the board or by any other state or  
34 federal regulatory agency.

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1 **REGULATORY PROVISION**

2 7. California Code of Regulations, title 16, section 1770 states, in pertinent part:

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

7 **FIRST CAUSE FOR DENIAL OF APPLICATION**

8 **(Convictions of Substantially Related Crimes)**

9 8. Respondent's application is subject to denial under Section 480, subdivision (a)(1), in  
10 that Respondent was convicted of substantially related crimes as follows:

11 a. On January 6, 2012, in *People v. Venia Willeen Banks*<sup>2</sup> (Super. Ct., Rancho  
12 Cucamonga Dist., San Bernardino County, 2012, No. MWV1103070), Respondent was convicted  
13 of one misdemeanor count of issuing a check without sufficient funds with intent to defraud in  
14 violation of Penal Code section 476. The court ordered pronouncement of judgment withheld and  
15 placed Respondent on Conditional and Revocable Release for 24 months with standard terms and  
16 conditions of probation. On September 30, 2013, Respondent was found to be in violation of  
17 probation, and Respondent's probation was extended to September 30, 2016. The circumstances  
18 leading to the conviction are that on or about July 12, 2011, Respondent entered a Chase Bank  
19 and attempted to cash four fraudulent money orders of \$925 each.

20 b. On December 1, 2010, in *People v. Venia Weelen Banks*<sup>3</sup> (Super. Ct., Rancho  
21 Cucamonga Dist., San Bernardino County, 2010, No. 10556VB), Respondent was convicted of  
22 one misdemeanor count of displaying an unauthorized disabled persons placard in violation of  
23 Vehicle Code section 4461, subdivision (c). On December 8, 2010, the court ordered  
24 pronouncement of judgment withheld and placed Respondent on Conditional and Revocable

25 <sup>2</sup> Respondent's name in this criminal action is spelled Venia Willeen Banks, but she  
26 spelled her name on her pharmacy technician application as Yania Willeen Banks. Respondent  
admitted in a letter to the Board to being the Defendant in this criminal case.

27 <sup>3</sup> Respondent's name in this criminal action is spelled Venia Weelen Banks, but she  
28 spelled her name on her pharmacy technician application as Yania Willeen Banks. Respondent  
admitted in a letter to the Board to being the Defendant in this criminal case.

1 Release for 36 months with standard terms and conditions of probation. On February 2, 2012,  
2 Respondent was found to be in violation of probation, and Respondent's probation was extended  
3 to February 3, 2015. On September 30, 2013, Respondent was found to be in violation of  
4 probation, and Respondent's probation was extended to September 30, 2016.

5 **SECOND CAUSE FOR DENIAL OF APPLICATION**

6 **(Knowingly Making a False Statement of Fact)**

7 9. Respondent's application is subject to denial under Section 480, subdivision (c), in  
8 that on or about September 14, 2013, Respondent knowingly made a false statement of fact to the  
9 Board by failing to disclose her two criminal convictions on her pharmacy technician application.  
10 On her application for registration as a pharmacy technician, Respondent answered "No" to the  
11 inquiry, "Have you ever been convicted of any crime in any state, the USA and its territories,  
12 military court or foreign country? Check the box next to 'Yes' if, you have ever been convicted  
13 or plead guilty to any crime. 'Conviction' includes a plea of no contest and any conviction that  
14 has been set aside or deferred pursuant to Section 1000 or 1203.4 of the Penal Code, including  
15 infractions, misdemeanor, and felonies. . . ." Respondent signed and dated the application on  
16 September 4, 2013, certifying "under penalty of perjury under the laws of the State of California  
17 to the truth and accuracy of all statements, answers and representations made in [the] application,  
18 including all supplementary statements." Complainant refers to, and by this reference  
19 incorporates, the allegations set forth above in paragraph 8, including all subparagraphs, as though  
20 set forth fully herein.

21 **THIRD CAUSE FOR DENIAL OF APPLICATION**

22 **(Acts Involving Dishonesty, Fraud, or Deceit)**

23 10. Respondent's application is subject to denial under Section 480, subdivision (a)(2), in  
24 that on three separate occasions, Respondent committed acts involving dishonesty, fraud, or  
25 deceit with the intent to substantially benefit herself, or substantially injure another. Complainant  
26 refers to, and by this reference incorporates, the allegations set forth above in paragraph 8,  
27 subparagraphs (a) and (b), and paragraph 9, as though set forth fully herein.

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1 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

2 **(Acts Warranting Denial of Licensure)**

3 11. Respondent's application is subject to denial under Sections 480, subdivision (a)(3),  
4 in that Respondent committed acts, which if done by a licentiate would be grounds for suspension  
5 or revocation of licensure, as follows:

6 a. Sections 4301, subdivision (l) and 490, for sustaining substantially related  
7 convictions. Complainant refers to, and by this reference incorporates, the allegations set forth  
8 above in paragraph 8, including all subparagraphs, as though set forth fully herein.

9 b. Section 4301, subdivision (f), for committed acts involving dishonesty, fraud,  
10 or deceit. Complainant refers to, and by this reference incorporates, the allegations set forth  
11 above paragraph 8, subparagraphs (a) and (b), and paragraph 9, as though set forth fully herein.

12 c. Section 4301, subdivision (o), for violating laws and regulations governing  
13 pharmacy. Complainant refers to, and by this reference incorporates, the allegations set forth  
14 above in paragraph 11, including subparagraphs (a) and (b).

15 **PRAYER**

16 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
17 and that following the hearing, the Board issue a decision:

- 18 1. Denying the application of Vania Willeen Banks for a Pharmacy Technician  
19 Registration; and  
20 2. Taking such other and further action as deemed necessary and proper.

21 DATED: 8/12/14

22 Virginia Herold  
23 VIRGINIA HEROLD  
24 Executive Officer  
25 Board of Pharmacy  
26 Department of Consumer Affairs  
27 State of California  
28 *Complainant*

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