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

In the Matter of the Accusation Against:
JENNIFER GUZMAN
1715 West Blvd.
Los Angeles, CA 90019
**Pharmacy Technician Registration No. TCH
129984**

Respondent.

Case No. 5519
DEFAULT DECISION AND ORDER
[Gov. Code, §11520]

FINDINGS OF FACT

1. On or about April 8, 2016, Complainant Virginia K. Herold, in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs, filed Accusation No. 5519 against Jennifer Guzman (Respondent) before the Board of Pharmacy (Board). The Accusation is attached as exhibit A.
2. On January 31, 2013, the Board issued Pharmacy Technician Registration No. TCH 129984 to Respondent. The Pharmacy Technician Registration was in full force and effect at all times relevant to the charges brought in Accusation No. 5519 and, unless renewed, it will expire on April 30, 2018

1 3. On May 24, 2016, Respondent was served by Certified Mail copies of the Accusation
2 No. 5519, Statement to Respondent, Notice of Defense, Request for Discovery, and Discovery
3 Statutes (Government Code sections 11507.5, 11507.6, and 11507.7) at Respondent's address of
4 record which, pursuant to Business and Professions Code section 4100, is required to be reported
5 and maintained with the Board. Respondent's address of record was and is 1715 West Boulevard,
6 Los Angeles, CA 90019.

7 4. Service of the Accusation was effective as a matter of law under the provisions of
8 Government Code section 11505, subdivision (c) and/or Business & Professions Code section
9 124.

10 5. Government Code section 11506(c) states, in pertinent part:

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

16 6. Respondent failed to file a Notice of Defense within 15 days after service upon her of
17 the Accusation, and therefore waived her right to a hearing on the merits of Accusation No. 5519.

18 7. California Government Code section 11520(a) states, in pertinent part:

19 (a) If the respondent either fails to file a notice of defense . . . or to appear at
20 the hearing, the agency may take action based upon the respondent's express
21 admissions or upon other evidence and affidavits may be used as evidence without
22 any notice to respondent.

23 8. Pursuant to its authority under Government Code section 11520, the Board finds
24 Respondent is in default. The Board will take action without further hearing and, based on the
25 relevant evidence contained in the Default Decision Evidence Packet in this matter, as well as
26 taking official notice of all the investigatory reports, exhibits and statements contained therein on
27 file at the Board's offices regarding the allegations contained in Accusation No. 5519, finds that
28 the charges and allegations in Accusation No. 5519, are separately and severally, found to be true
and correct by clear and convincing evidence.

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1 9. Taking official notice of its own internal records, pursuant to Business and
2 Professions Code section 125.3, it is hereby determined that the reasonable costs for investigation
3 and enforcement are \$10,578.75 as of December 14, 2016.

4 DETERMINATION OF ISSUES

5 1. Based on the foregoing findings of fact, Respondent Jennifer Guzman has subjected
6 her Pharmacy Technician Registration No. TCH 129984 to discipline.

7 2. The agency has jurisdiction to adjudicate this case by default.

8 3. The Board of Pharmacy is authorized to revoke Respondent's Pharmacy Technician
9 Registration based upon the following violations alleged in the Accusation which are supported
10 by the evidence contained in the Default Decision Evidence Packet in this case:

11 a. Conviction of a substantially related crime. (Bus. & Prof. Code, §§ 490, 4301, subd.
12 (l); Cal. Code Regs., tit. 16, § 1770.)

13 b. Violate Pharmacy Law—Unlawful possession of a controlled substance. (Bus. &
14 Prof. Code, §§ 4301, subd. (o), 4060; Cal. Code Regs., tit. 16, § 1770.)

15 c. Violate state statutes regulating controlled substances and dangerous drugs. (Bus. &
16 Prof. Code, §§ 4301, subd. (j), 4060; Health & Saf. Code, §§ 11350, subd. (a), 11352, subd. (a),
17 11377, subd. (a); Cal. Code Regs., tit. 16, § 1770.)

18 d. Dangerous use of drugs. (Bus. & Prof. Code, § 4301, subd. (h); Cal. Code Regs., tit.
19 16, § 1770.)

20 e. Dishonesty. (Bus. & Prof. Code, § 4301, subd. (f); Cal. Code Regs., tit. 16, § 1770.)

21 f. Denial-worthy conduct. (Bus. & Prof. Code, § 4301, subd. (p); Cal. Code Regs., tit.
22 16, § 1770.)

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ORDER

IT IS SO ORDERED that Pharmacy Technician Registration No. TCH 129984, heretofore issued to Respondent Jennifer Guzman, 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 at 5:00 p.m. on March 9, 2017.

It is so ORDERED on February 7, 2017.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA



By _____

Amy Gutierrez, Pharm.D.
Board President

Attachment:
Exhibit A: Accusation

LA2015501273 | 52323941

Exhibit A

Accusation

(JENNIFER GUZMAN)

1 KAMALA D. HARRIS
Attorney General of California
2 LINDA L. SUN
Supervising Deputy Attorney General
3 MATTHEW A. KING
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6 (213) 897-7446

7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. 5519

12 **JENNIFER GUZMAN**
1715 West Blvd.
13 Los Angeles, CA 90019

ACCUSATION

14 **Pharmacy Technician Registration No.**
15 **TCH 129984**

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

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

22 2. On January 31, 2013, the Board issued Pharmacy Technician Registration Number
23 TCH 129984 to Jennifer Guzman (Respondent). The Pharmacy Technician Registration was in full
24 force and effect at all times relevant to the charges brought herein and will expire on April 30,
25 2016, unless it is renewed.

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JURISDICTION

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

4. Section 4300.1 of the Code states:

The expiration, cancellation, forfeiture, or suspension of a board-issued license by operation of law or by order or decision of the board or a court of law, the placement of a license on a retired status, or the voluntary surrender of a license by a licensee shall not deprive the board of jurisdiction to commence or proceed with any investigation of, or action or disciplinary proceeding against, the licensee or to render a decision suspending or revoking the license.

5. Section 4300 of the Code states, in pertinent part, that every license issued may be suspended or revoked, and that proceedings to suspend or revoke a license over which the Board has authority must be conducted in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the Government Code.

STATUTES

6. Section 490 of the Code states:

(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.

(c) A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action that a board is permitted to take following the establishment of a conviction may be taken 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 the provisions of Section 1203.4 of the Penal Code.

(d) The Legislature hereby finds and declares that the application of this section has been made unclear by the holding in *Petropoulos v. Department of Real Estate* (2006) 142 Cal.App.4th 554, and that the holding in that case has placed a significant number of statutes and regulations in question, resulting in potential harm to the consumers of California from licensees who have been convicted of crimes. Therefore, the Legislature finds and declares that this section establishes an independent basis for a

1 board to impose discipline upon a licensee, and that the amendments to this section
2 made by Senate Bill 797 of the 2007 -08 Regular Session do not constitute a change to,
3 but rather are declaratory of, existing law.

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12 7. Section 492 of the Code states:

13 Notwithstanding any other provision of law, successful completion of any
14 diversion program under the Penal Code, or successful completion of an alcohol and
15 drug problem assessment program under Article 5 (commencing with section 23249.50)
16 of Chapter 12 of Division 11 of the Vehicle Code, shall not prohibit any agency
17 established under Division 2 ([Healing Arts] commencing with Section 500) of this
18 code, or any initiative act referred to in that division, from taking disciplinary action
19 against a licensee or from denying a license for professional misconduct,
20 notwithstanding that evidence of that misconduct may be recorded in a record
21 pertaining to an arrest.

22 This section shall not be construed to apply to any drug diversion program
23 operated by any agency established under Division 2 (commencing with Section 500) of
24 this code, or any initiative act referred to in that division.

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28 8. Section 493 of the Code states:

Notwithstanding any other provision of law, in a proceeding conducted by a
board within the department pursuant to law to deny an application for a license or to
suspend or revoke a license or otherwise take disciplinary action against a person who
holds a license, upon the ground that the applicant or the licensee has been convicted of
a crime substantially related to the qualifications, functions, and duties of the licensee in
question, the record of conviction of the crime shall be conclusive evidence of the fact
that the conviction occurred, but only of that fact, and the board may inquire into the
circumstances surrounding the commission of the crime in order to fix the degree of
discipline or to determine if the conviction is substantially related to the qualifications,
functions, and duties of the licensee in question.

As used in this section, 'license' includes 'certificate,' 'permit,' 'authority,' and
'registration.'

9. Section 4301 of the Code states:

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

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

...

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

6 ...

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

9 ...

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

28 ...

19 (o) Violating or attempting to violate, directly or indirectly, or assisting in or
20 abetting the violation of or conspiring to violate any provision or term of this chapter or
21 of the applicable federal and state laws and regulations governing pharmacy, including
22 regulations established by the board or by any other state or federal regulatory agency.

23 ...

24 (p) Actions or conduct that would have warranted denial of a license.

25 10. Section 4060 of the Code states:

26 No person shall possess any controlled substance, except that furnished to a
27 person upon the prescription of a physician, dentist, podiatrist, optometrist,
28 veterinarian, or naturopathic doctor pursuant to Section 3640.7, or furnished pursuant to
a drug order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse
practitioner pursuant to Section 2836.1, or a physician assistant pursuant to Section

1 3502.1, or naturopathic doctor pursuant to Section 3640.5, or a pharmacist pursuant to
2 either subparagraph (D) of paragraph (4) of, or clause (iv) of subparagraph (A) of
3 paragraph (5) of, subdivision (a) of Section 4052. This section shall not apply to the
4 possession of any controlled substance by a manufacturer, wholesaler, pharmacy,
5 pharmacist, physician, podiatrist, dentist, optometrist, veterinarian, naturopathic doctor,
6 certified nurse-midwife, nurse practitioner, or physician assistant, when in stock in
7 containers correctly labeled with the name and address of the supplier or producer.

8 Nothing in this section authorizes a certified nurse-midwife, a nurse practitioner, a
9 physician assistant, or a naturopathic doctor, to order his or her own stock of dangerous
10 drugs and devices.

11 REGULATIONS

12 11. California Code of Regulations, title 16, section 1770, states:

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

20 COST RECOVERY

21 12. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
22 administrative law judge to direct a licentiate found to have committed a violation or violations of
23 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
24 enforcement of the case.

25 DRUG CLASSIFICATIONS

26 13. Alprazolam is a dangerous drug and Schedule IV controlled substance and narcotic
27 drug. (Bus. & Prof. Code, §, 4022; Health & Saf. Code, § 11057, subd. (d).) Alprazolam is a
28 benzodiazepine used to treat anxiety disorders, panic disorders and depression.

14 14. Dulera is a brand name for a combination of formoterol and mometasone. Formoterol
15 is a long-acting bronchodilator that relaxes muscles in the airways to improve breathing.
16 Mometasone is a steroid. It prevents the release of substances in the human body that cause
17 inflammation. Dulera is a dangerous drug. (Bus. & Prof. Code, § 4022.)

18 15. Neomycin is a dangerous drug that acts as an antibiotic. (Bus. & Prof. Code, § 4022.)
19 It is used to fight certain types of bacteria and to reduce the risk of infection during intestinal

1 surgery. It is also used to reduce the symptoms of hepatic coma, which occurs in advanced
2 cirrhosis, hepatitis, poisoning or other liver disease.

3 16. Neomycin and polymyxin B sulfates and hydrocortisone ophthalmic suspension is a
4 sterile antimicrobial and anti-inflammatory dangerous drug indicated for eye infections. (Bus. &
5 Prof. Code, § 4022.)

6 17. Ofloxacin is a dangerous drug that acts as an antibiotic. (Bus. & Prof. Code, § 4022.)
7 It attacks certain types of bacteria in the human body, especially bacterial infections of the skin,
8 lungs, prostate and urinary tract. It is also indicated for the treatment of pelvic inflammatory
9 disease and Chlamydia and gonorrhea.

10 18. Omeprazole is a proton pump inhibitor indicated for gastroesophageal reflux disease
11 and other conditions caused by excess stomach acid. It is used to promote healing of erosive
12 esophagitis (damage to the esophagus caused by stomach acid). Omeprazole is a dangerous drug.
13 (Bus. & Prof. Code, § 4022.)

14 19. ProAir HFA aerosol is a brand name for albuterol, a dangerous drug. (Bus. & Prof.
15 Code, § 4022.) Albuterol is a bronchodilator that widens airways in the lungs. It is indicated for
16 patients with asthma and certain other respiratory diseases.

17 20. Promethazine is a prescription-strength antihistamine indicated for allergy symptoms,
18 such as itching, runny nose, sneezing, itchy or watery eyes, hives and itchy skin rashes.
19 Promethazine is a dangerous drug. (Bus. & Prof. Code, § 4022.)

20 21. Promethazine with codeine cough syrup is a dangerous drug and Schedule V
21 controlled substance. Codeine is a narcotic pain reliever and cough suppressant. (Bus. & Prof.
22 Code, § 4022; Health & Saf. Code, § 11058.) Promethazine is an antihistamine that blocks the
23 effects of the naturally occurring chemical histamine in the human body. The combination of
24 codeine and promethazine is used to treat cold and allergy symptoms.

25 22. Tobramycin is a dangerous drug. It is used to treat serious infections caused by certain
26 types of bacteria. (Bus. & Prof. Code, § 4022.)

27 23. Tobramycin and dexamethasone ophthalmic is a steroidal dangerous drug used to treat
28 bacterial eye infections. (Bus. & Prof. Code, § 4022.)

1 24. Zofran is a brand name for ondansetron, a dangerous drug. (Bus. & Prof. Code, §
2 4022.) Ondansetron is used to prevent nausea and vomiting that may be the result of surgery or
3 cancer treatment.

4 STATEMENT OF FACTS

5 25. Between October 2011 and January 2014, Respondent stole dangerous drugs and
6 controlled substances from CVS/pharmacy (CVS). Then in September 2014, she stole non-drug-
7 related merchandise from Target. The circumstances of the CVS thefts are alleged in subdivision
8 (A), below. The circumstances of the Target theft are alleged in subdivision (B), below.

9 **A. CVS Drug Diversion**

10 26. On or about October 21, 2011, CVS hired Respondent as a pharmacy technician in its
11 store located at 5944 North Figueroa Avenue, Los Angeles, California, 90042 (store number
12 09665).

13 27. On or about December 29, 2013, CVS undertook an investigation of Respondent to
14 determine whether she was involved in prescription drug theft. During the course of that
15 investigation, Respondent admitted that she diverted drugs from the pharmacy for her personal
16 use.

17 28. On or about January 20, 2014, Respondent made a voluntary written statement to
18 CVS investigators. She admitted that on January 17, 2014, she stole promethazine with codeine
19 cough syrup. She admitted to thefts throughout her employment at CVS and confessed that on
20 past occasions (whose exact dates are known to Respondent but unknown to Complainant) she
21 stole 1) tobramycin; 2) neomycin; 3) ofloxacin; 4) tobramycin and dexamethasone ophthalmic;
22 5) neomycin and polymyxin B sulfates and hydrocortisone ophthalmic suspension; 6) Dulera; 7)
23 Proair HFA aerosol; 8) alprazolam; 9) Zofran; 10) omeprazole; and 11) promethazine. Respondent
24 stated that she stole some, if not all, of the medications by hiding them in her bra. She stole the
25 medications for personal use and did, in fact, use them.

26 29. CVS fired Respondent on or about January 20, 2014.

27 30. On or about January 29, 2014, CVS alerted the Board of Respondent's theft. CVS
28 reported the loss of 1,419 milliliters of promethazine with codeine and 90 tablets of 2 milligram-

1 strength alprazolam. CVS valued the drugs at \$1,328.69.

2 **B. Target Burglary**

3 31. On or about September 8, 2014, Respondent stole baby wipes and formula from a
4 Target department store located at 6000 Sepulveda Boulevard in Culver City. Respondent told the
5 arresting officer that, in addition to stealing formula and baby wipes on September 8, 2014, she
6 also stole "about six other times" from Target. She admitted that at other times she has stolen
7 "cameras and a navigation [system]." The arresting officer asked Respondent if she had money to
8 pay for the formula and baby wipes. Respondent said, "Yeah[,] my mom gave me money to buy
9 some things and I have some more money in my wallet."

10 32. On or about June 26, 2015, Respondent pleaded *nolo contendere* to one misdemeanor
11 count of burglary (Pen. Code, § 459). The Los Angeles County Superior Court suspended the
12 imposition of sentence and placed Respondent on summary probation for 36 months. It ordered
13 her to pay Target \$2,100. (*People v. Jennifer Guzman* (Super. Ct. L.A. County, 2015, No.
14 SA088591).)

15 **FIRST CAUSE FOR DISCIPLINE**

16 **(Conviction of a Substantially Related Crime)**

17 33. Respondent is subject to disciplinary action under Code sections 490 and 4301,
18 subdivision (I), in conjunction with California Code of Regulations, title 16, section 1770, because
19 she was convicted of a crime that is substantially related to the qualifications, functions and duties
20 of a pharmacy technician. Complainant realleges paragraphs 31 through 32.

21 **SECOND CAUSE FOR DISCIPLINE**

22 **(Violate Pharmacy Law—Unlawful Possession of a Controlled Substance)**

23 34. Respondent is subject to disciplinary action under Code section 4301, subdivision (o),
24 in conjunction with California Code of Regulations, title 16, section 1770, because she violated
25 provisions of the Pharmacy Law, in particular Code section 4060, which prohibits possession of a
26 controlled substance except that furnished to a person upon the prescription of a person who is
27 authorized by law to write a prescription, or except that possessed by a manufacturer, wholesaler,
28 pharmacy, pharmacist, physician, podiatrist, dentist, optometrist, veterinarian, naturopathic doctor,

1 certified nurse-midwife, nurse practitioner, or physician assistant, when in stock in containers
2 correctly labeled with the name and address of the supplier or producer. Respondent unlawfully
3 possessed controlled substances without having a prescription for them and without being exempt
4 as a person entitled to possess a prescription that is correctly labeled and in a proper container.
5 Complainant realleges paragraphs 13 through 30.

6 **THIRD CAUSE FOR DISCIPLINE**

7 **(Violate State Statutes Regulating Controlled Substances and Dangerous Drugs)**

8 35. Respondent is subject to disciplinary action under Code section 4301, subdivision (j),
9 in conjunction with California Code of Regulations, title 16, section 1770, because she violated a
10 state statute regulating controlled substances and dangerous drugs. In particular, Respondent
11 violated Code section 4060 and Health and Safety Code sections 11350, subdivision (a), 11352,
12 subdivision (a), and 11377, subdivision (a). Complainant realleges paragraphs 13 through 34.

13 **FOURTH CAUSE FOR DISCIPLINE**

14 **(Dangerous Use of Drugs)**

15 36. Respondent is subject to disciplinary action under Code section 4301, subdivision (h),
16 in conjunction with California Code of Regulations, title 16, section 1770, because she
17 administered to herself a controlled substance and used dangerous drugs in a manner as to be
18 dangerous or injurious to herself and to others. In particular, Respondent used controlled
19 substances and dangerous drugs without a prescription therefor. Complainant realleges paragraphs
20 13 through 32.

21 **FIFTH CAUSE FOR DISCIPLINE**

22 **(Dishonesty)**

23 37. Respondent is subject to disciplinary action under Code section 4301, subdivision (f), in
24 conjunction with California Code of Regulations, title 16, section 1770, because she committed an act
25 involving dishonesty and deceit. Complainant realleges paragraphs 13 through 32.

26 **SIXTH CAUSE FOR DISCIPLINE**

27 **(Denial-Worthy Conduct)**

28 38. Respondent is subject to disciplinary action under Code section 4301, subdivision (p),

1 in conjunction with California Code of Regulations, title 16, section 1770, because she committed
2 acts that would have warranted denial of a license. Complainant realleges paragraphs 13 through
3 37.

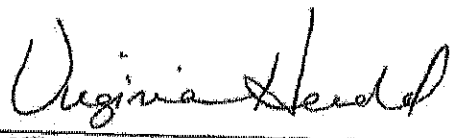
4 PRAYER

5 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
6 and that following the hearing, the Board of Pharmacy issue a decision:

- 7 1. Revoking or suspending Pharmacy Technician Registration Number TCH 129984,
8 issued to Jennifer Guzman;
- 9 2. Ordering Jennifer Guzman to pay the Board of Pharmacy the reasonable costs of the
10 investigation and enforcement of this case, pursuant to Business and Professions Code section
11 125.3; and,
- 12 3. Taking such other and further action as deemed necessary and proper.

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DATED: 4/8/16



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

28 LA2015501273