

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

In the Matter of the  
Statement of Issues Against:

JONATHAN TERRELL STONE,  
  
Pharmacy Technician Registration Applicant,  
  
Respondent.

Case No. 5302

OAH No. 2015090724

**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 at 5:00 p.m. on June 17, 2016.

It is so ORDERED on May 18, 2016.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA



By

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

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**PROPOSED DECISION**

This matter was heard by Samuel D. Reyes, Administrative Law Judge, Office of Administrative Hearings, in Los Angeles, California, on March 21, 2016.

Rick Zou, Certified Law Student, and Nancy A. Kaiser, Deputy Attorney General, represented Virginia Herold (Complainant).

Jonathan Terrell Stone (Respondent) represented himself.

Complainant seeks to deny Respondent's Pharmacy Technician Application (Application) based on allegations that Respondent suffered five criminal convictions, on the conduct underlying some of the convictions, and on his failure to disclose four of the convictions. Respondent presented evidence in mitigation and rehabilitation in support of licensure.

Oral and documentary evidence was received at the hearing and the matter was submitted for decision.

**FACTUAL FINDINGS**

1. Complainant filed the Statement of Issues in her official capacity as Executive Officer, Board of Pharmacy, Department of Consumer Affairs (Board).
2. Respondent filed the Application on October 14, 2013, which was received by the Board on October 28, 2013.

3. a. Question 7 of the Application asked Respondent if he had "ever been convicted of any crime in any state, the USA and its territories, military court or foreign country" and, if so, required Respondent to disclose details regarding the conviction(s). (Exh. 2, at p. 38.)

b. Respondent answered Question 7 of the Application in the affirmative and disclosed details of the conviction set forth in factual finding number 8.

c. Respondent knowingly failed to disclose the convictions set forth in factual finding numbers 4 through 7, which omission constitutes the making of a false statement.

d. Respondent explained that he did not disclose the convictions because they were too old. Respondent's belief is not a reasonable one, as it is not consistent with the language of Question 7.

4. On April 27, 2004, in the Superior Court, County of San Bernardino, State of California, in case number TWV043867, Respondent was convicted, on his plea of guilty, of violating Vehicle Code section 23152, subdivision (a) (driving under the influence of alcohol or drugs), and of violating Vehicle Code section 23152, subdivision (b) (driving while having a blood alcohol level of .08% or higher), misdemeanors. The conviction stemmed from Respondent driving his vehicle after consuming alcoholic beverages. The Court withheld pronouncement of judgment and placed Respondent on a conditional and revocable release for 36 months on terms and conditions that included payment of \$1,494 in fines and fees, completion of a first offender alcohol counseling program, and restriction of his license for three months.

5. On January 31, 2006, in the Superior Court, County of Los Angeles, Pomona Courthouse Division, State of California, in case number 5PM09489, Respondent was convicted, on his plea of guilty, of violating Vehicle Code section 12500, subdivision (a) (driving without a license), a misdemeanor. The Court suspended imposition of sentence and placed Respondent on summary probation for one year on terms and conditions that included payment of \$496 in fines and fees.

6. a. On December 6, 2006, in the Superior Court, County of Los Angeles, Metropolitan Courthouse Division, State of California, in case number 6MP11387, Respondent was convicted, on his plea of no contest, of violating Vehicle Code section 23152, subdivision (b) (driving while having a blood alcohol level of .08% or higher), a misdemeanor. The Court suspended imposition of sentence and placed Respondent on summary probation for 60 months on terms and conditions that included service of 13 days in county jail, with credit for one day, and payment of \$1,588 in fines and fees. Respondent was permitted to participate in an 18-month alcohol abuse treatment program in lieu of serving jail time.

b. In this case, Respondent drove home on October 28, 2006, after drinking alcoholic beverages at a party. He was stopped by police officers after he made an illegal turn.

7. a. On March 9, 2007, in the Superior Court, County of San Bernardino, State of California, in case number MWV109242, Respondent was convicted, on his plea of guilty, of violating Penal Code section 647, subdivision (f) (public intoxication), a misdemeanor. The Court withheld pronouncement of judgment and placed Respondent on a conditional and revocable release for 24 months on terms and conditions that included payment of a \$275 fine and attendance to Alcoholics Anonymous (AA) meetings for 12 weeks.

b. The facts and circumstances underlying the conviction are that on November 26, 2006, Respondent was found to be under the influence of alcoholic beverages at the time he was urinating in a public area of the Ontario Convention Center. Respondent had earlier been ejected from a concert at the Ontario Convention Center for jumping on the stage and for refusing to leave the stage.

8. a. On February 17, 2011, in the Superior Court, County of Los Angeles, Criminal Justice Center, in case number BA376530, Respondent was convicted, on his plea of guilty, of violating Penal Code section 186.10, subdivision (a) (money laundering), a misdemeanor. The Court suspended imposition of sentence and placed Respondent on formal probation for five years on terms and conditions that included performance of 120 hours of community service for the California Department of Transportation, and payment of \$270 in fines and fees.

b. The events that led to the conviction occurred in July 2007. At the request of his partner, Respondent deposited \$221,132.05 into his bank account and later withdrew \$30,000 of that amount for re-deposit into another account. The money was obtained by Respondent's partner through fraudulent means, and was part of a larger identity theft conspiracy. Respondent was not involved in the criminal activities through which the \$221,132.05 were obtained. Respondent testified that his partner lied to him and took advantage of him.

9. Respondent's convictions are for crimes substantially related to the duties, functions, and qualifications of a pharmacy technician pursuant to California Code of Regulations, title 16, section 1770. The conduct underlying the convictions set forth in factual finding numbers 4 and 6 involves the use alcoholic beverages in a reckless manner, and the conduct underlying the conviction set forth in factual finding number 8 involves dishonesty. In each of these cases, and in the cases of the convictions set forth in factual finding numbers 5 and 7, Respondent demonstrated poor judgment, and his conduct, particularly when viewed in the aggregate, evidences present or potential unfitness to discharge the duties of a pharmacy technician.

10. Respondent has complied with the terms and conditions of criminal probation.

11. Respondent attributed his convictions to youthful indiscretions and to being with the wrong individuals. He has new friends, many of whom work with him. He is now 32 years old, and has been working as a pharmacy assistant at Kaiser Permanente Southern California (Kaiser) since June 2006. From his testimony and that of two coworkers, Sasha Aliabadi (Aliabadi) and Joel Virrueta (Virrueta), and from his performance evaluations and a letter from a former supervisor, it is clear that Respondent has excelled in his job and that his employer relies on him for critical tasks. Respondent's judgment is valued at work, as his responsibilities include the handling of money, and his recommendations regarding hiring Aliabadi and Virrueta have been taken into account in the employment of the two individuals.

12. Some of the convictions involved the use of alcohol, and Respondent is receiving treatment to address the alcohol abuse problem. He stopped consuming alcoholic beverages in June 2011. He completed the counseling programs mandated by the criminal courts, and attended AA meetings as part of program requirements. Since July 2011, he has been participating in Kaiser's Outreach Program, an ongoing outpatient treatment program. He currently attends group counseling sessions twice weekly and participates in individual counseling as needed.

13. On August 2, 2013, Respondent obtained a Certified Pharmacy Technician certificate from the Pharmacy Technician Certification Board.

14. a. Aliabadi has known Respondent for five years. He described Respondent as an honest, hard-working man, one valued at work and considered the "go to" person. Virrueta, who has known Respondent for eight or nine years, testified that Respondent is a hard worker who is loved by his coworkers. Respondent has disclosed his convictions to both individuals. Neither has observed Respondent drink alcoholic beverages.

b. Respondent also submitted the letter of Outpatient Pharmacy Supervisor Vy Trinh (Trinh), a former coworker and supervisor. Trinh referred to Respondent as an exceptional employee and a person who would thrive in almost any setting.

## LEGAL CONCLUSIONS

1. Grounds exist to deny Respondent's Application pursuant to Business and Professions Code section 480, subdivision (a)(1), and California Code of Regulations, title 16, section 1770, in that he suffered five convictions substantially related to the qualifications, functions and duties of a pharmacy technician, by reason of factual finding numbers 4 through 9.

2. Grounds exist to deny Respondent's Application pursuant to Business and Professions Code section 480, subdivision (a)(2), in that he engaged in acts of dishonesty with the intent to benefit himself, by reason of factual finding number 8.

3. Grounds exist to deny Respondent's Application pursuant to Business and Professions Code section 480, subdivision (d), in that he knowingly made a false statement in the Application, by reason of factual finding numbers 2 through 7.

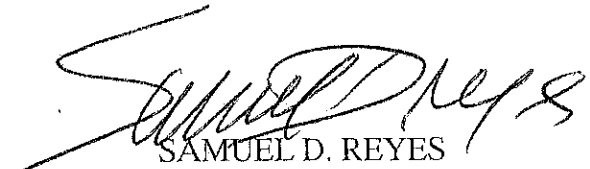
4. Grounds exist to deny Respondent's Application pursuant to Business and Professions Code sections 480, subdivision (a)(3), 490, 4301, subdivisions (f), (h), (k), (l), and (o), and California Code of Regulations, title 16, section 1770, in that he engaged in conduct that would constitute grounds to discipline a licensee, by reason of factual finding numbers 4 through 9 and legal conclusion numbers 1 and 2.

5. All evidence submitted in support and against licensure has been considered. Respondent has taken steps to rehabilitate himself, including complying with the terms of probation, not suffering any other arrest or conviction since February 2011, dealing with his substance abuse problems, and educating himself in the pharmacy technician field. He is a different person, with a long and stable employment track record, and with new and different friends. However, his criminal convictions are multiple and the most recent one was very serious and involved dishonesty. His failure to disclose four of the five convictions raises questions about his honesty and rehabilitation. Respondent has been under the supervision of the criminal courts for most of his adult life, and thus has not been able to demonstrate rehabilitation absent such supervision. A period in which Respondent can demonstrate his rehabilitation without the threat of the imposition of a stayed sentence is necessary for the protection of the public. Accordingly, the application must be denied at this time.

#### ORDER

The Application of Respondent Jonathan Terrell Stone for registration as a pharmacy technician is denied.

DATED: 4/28/16

  
SAMUEL D. REYES  
Administrative Law Judge  
Office of Administrative Hearings

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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 Statement of Issues  
Against:

Case No. 5302

12 **JONATHAN TERRELL STONE**

**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 October 28, 2013, the Board received an application for a Pharmacy  
23 Technician Registration from Jonathan Terrell Stone (Respondent). On or about October 14,  
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 August 6, 2014.

26 **JURISDICTION**

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

4 4. Section 4300 provides in pertinent part, that every license issued by the Boards is  
5 subject to discipline, including suspension or revocation.

6 **STATUTORY PROVISIONS**

7 5. Section 480<sup>1</sup> states, in pertinent part:

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

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

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

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

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

23 "(b) Notwithstanding any other provision of this code, no person shall be denied a license  
24 solely on the basis that he or she has been convicted of a felony if he or she has obtained a

25  
26 <sup>1</sup> This Statement of Issues is based on Code section 480 as it was in effect at the time of the denial. Section 480  
27 was amended effective January 1, 2015, with the addition of the following language: "(c) Notwithstanding any other  
28 provisions of this code, a person shall not be denied a license solely on the basis of a conviction that has been dismissed  
pursuant to Section 1203.4, 1203.4a, or 1203.41 of the Penal Code. An applicant who has a conviction that has been  
dismissed pursuant to Section 1203.4, 1203.4a, or 1203.41 of the Penal Code shall provide proof of the dismissal."



1 certificate of rehabilitation under Chapter 3.5 (commencing with Section 4852.01) of Title 6 of  
2 Part 3 of the Penal Code or that he or she has been convicted of a misdemeanor if he or she has  
3 met all applicable requirements of the criteria of rehabilitation developed by the board to evaluate  
4 the rehabilitation of a person when considering the denial of a license under subdivision (a) of  
5 Section 482.

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

8 6. Section 490 provides, in pertinent part, that a board may suspend or revoke a license  
9 on the ground that the licensee has been convicted of a crime substantially related to the  
10 qualifications, functions, or duties of the business or profession for which the license was issued..

11 7. Section 4301 states, in pertinent part:

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

15 . . . .

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

19 . . . .

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

25 . . . .

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

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

18           ....

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

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

24                               **REGULATORY PROVISIONS**

25           8. California Code of Regulations, title 16, section 1770, states:

26           "For the purpose of denial, suspension, or revocation of a personal or facility license  
27 pursuant to Division 1.5 (commencing with Section 475) of the Business and Professions Code, a  
28 crime or act shall be considered substantially related to the qualifications, functions or duties of a

1 licensee or registrant if to a substantial degree it evidences present or potential unfitness of a  
2 licensee or registrant to perform the functions authorized by his license or registration in a manner  
3 consistent with the public health, safety, or welfare."

4 ///

5 ///

6 **FIRST CAUSE FOR DENIAL OF APPLICATION**

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

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

10 a. On or about February 17, 2011, after pleading guilty, Respondent was convicted of  
11 one felony count of violating Penal code section 186.10, subdivision (a) [money laundering] in the  
12 criminal proceeding entitled *The People of the State of California v. Jonathan Stone* (Super. Ct.  
13 L.A. County, 2011, No. BA376530-02). The Court ordered respondent to pay restitution to  
14 victim, Indymac Bank, in the amount of \$230,000.00, and placed him on 60 months formal  
15 probation, with terms and conditions.

16 b. The circumstances surrounding the conviction are that on or about July 3, 2007,  
17 proceeds from a fraudulent sale of a house were wired to Respondent's bank account. Respondent  
18 subsequently wired money from his account to another account belonging to him. In addition  
19 Respondent was captured on video surveillance withdrawing \$30,000.00 from the original  
20 account.

21 c. On or about March 9, 2007, after pleading guilty, Respondent was convicted of one  
22 misdemeanor count of violating Penal Code section 647, subdivision (f) [disorderly conduct/public  
23 intoxication] in the criminal proceeding entitled *The People of the State of California v. Jonathan*  
24 *Terrell Stone* (Super. Ct. San Bernardino County, 2007, No. MWV109242). The Court placed  
25 Respondent 24 months probation, with terms and conditions

26 d. The circumstances surrounding the conviction are that on or about November 26,  
27 2006, Respondent was asked to leave the Ontario Convention Center after jumping up on the  
28 stage during a concert. Once outside, Respondent urinated on a pillar at the main entrance. An

1 Ontario Police Officer was called by security after Respondent refused to leave. Respondent was  
2 found slumped over in a corner. When Respondent saw the officer, he attempted to stand up, but  
3 had difficulty maintaining his balance. The officer could smell a strong smell of alcohol on his  
4 breath. He was observed to have red, watery eyes, and slurred speech. Respondent was  
5 subsequently arrested after it was determined that he could not care for his safety or the safety of  
6 others.

7 e. On or about December 6, 2006, after pleading nolo contendere, Respondent was  
8 convicted of one misdemeanor count of violating Vehicle Code section 23152, subdivision (b)  
9 [driving while having 0.08% or more, by weight, of alcohol in his blood] in the criminal proceeding  
10 entitled *The People of the State of California v. Jonathan T. Stone* (Super. Ct. L.A. County, 2006,  
11 No. 6MP11387). The Court sentenced Respondent to serve ten days in Los Angeles County Jail  
12 and placed him on 60 months probation, with terms and conditions.

13 f. The circumstances surrounding the conviction are that on or about October 28, 2006,  
14 drove a vehicle while having 0.08% or more, by weight of alcohol in his blood.

15 g. On or about January 31, 2006, after pleading guilty, Respondent was convicted of one  
16 misdemeanor count of violating Vehicle Code section 12500, subdivision (a) [driving without a  
17 license] in the criminal proceeding entitled *The People of the State of California v. Jonathan*  
18 *Terrell Stone* (Super. Ct. L.A. County, 2006, No. 5PM09489). The Court placed Respondent on  
19 one year probation, with terms and conditions.

20 h. The circumstances surrounding the conviction are that on or about December 2, 2005,  
21 Respondent drove a vehicle without a license.

22 i. On or about April 27, 2004, after pleading guilty, Respondent was convicted of one  
23 misdemeanor count of violating Vehicle Code section 23152, subdivision (a) [driving under the  
24 influence of alcohol or drugs] and one misdemeanor count of violating Vehicle Code section  
25 23152, subdivision (b) [driving while having 0.08% or more, by weight, of alcohol in his blood] in  
26 the criminal proceeding entitled *The People of the State of California v. Jonathan Terrell Stone*  
27 (Super. Ct. San Bernardino County, 2004, No. TWV043867). The Court placed Respondent on  
28 36 months probation, with terms and conditions.

1 j. The circumstance surrounding the conviction are that on or about March 5, 2004,  
2 Respondent drove a vehicle while having 0.08% or more, by weight, of alcohol in his blood.

3 **SECOND CAUSE FOR DENIAL OF APPLICATION**

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

5 10. Respondent's application is subject to denial under section 480, subdivision (a)(2), in  
6 that Respondent committed acts involving dishonesty, fraud, or deceit with the intent to  
7 substantially benefit herself, or substantially injure another. Complainant refers to, and by this  
8 reference incorporates, the allegations set forth above in paragraph 9, subparagraphs (a) and (b),  
9 inclusive, as though set forth fully

10 **THIRD CAUSE FOR DENIAL OF APPLICATION**

11 **(Knowingly Made a False Statement of Fact)**

12 11. Respondent application is subject to denial under section 480, subdivision (c), in that  
13 on or about October 14, 2013, Respondent knowingly made a false statement of fact by failing to  
14 disclose four additional convictions, on his application for licensure. In addition, Respondent  
15 signed under penalty of perjury, under the laws of the State of California, that the forgoing was  
16 true and correct, on his application for licensure. Complainant refers to, and by this reference  
17 incorporates, the allegations set forth in paragraph 9, subparagraphs (e) through (j), inclusive, as  
18 though set forth fully.

19 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

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

21 12. Respondent's application is subject to denial under sections 4301, subdivision (p) and /  
22 or (o), and 480, subdivisions (a)(3)A) and (a)(3)(B), in that Respondent committed acts which if  
23 done by a licentiate of the business and profession in question, would be grounds for suspension or  
24 revocation of his license as follows:

25 a. Respondent was convicted of crimes substantially related to the qualifications,  
26 functions, or duties of a pharmacy technician which to a substantial degree evidence his present or  
27 potential unfitness to perform the functions authorized by his license in a manner consistent with  
28 the public health, safety, or welfare, in violation of sections 4301, subdivision (l), and 490, in

1 conjunction with California Code of Regulations, title 16, section 1770. Complainant refers to,  
2 and by this reference incorporates, the allegations set forth above in paragraph 9, subparagraphs  
3 (a) through (j), inclusive, as though set forth fully.

4 b. Respondent committed acts involving dishonesty, fraud, or deceit, in violation of  
5 section 4301, subdivision (f). Complainant refers to, and by this reference incorporates, the  
6 allegations set forth above in paragraph 9, subparagraphs (a) and (b), inclusive, as though set forth  
7 fully.

8 c. Respondent used alcoholic beverages to an extent or in a manner dangerous or  
9 injurious to himself, any person, or the public, in violation of section 4301, subdivision (h).  
10 Complainant refers to, and by this reference incorporates, the allegations set forth above in  
11 paragraph 9, subparagraphs (d), (f), and (j), inclusive, as though set forth fully.

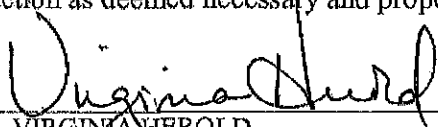
12 d. Respondent sustained more than one conviction involving the consumption of  
13 alcoholic beverages, in violation of sections 4301, subdivisions (k). Complainant refers to, and by  
14 this reference incorporates, the allegations set forth above in paragraph 9, subparagraphs (c), (e),  
15 and (i), inclusive, as though set forth fully.

16  
17 **PRAYER**

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

- 20 1. Denying the application of Jonathan Terrell Stone for a Pharmacy Technician  
21 Registration; and  
22 2. Taking such other and further action as deemed necessary and proper.

23 DATED: 3/31/15

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

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