

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

In the Matter of the Accusation Against:

ANTWONE M. SHIELDS

Pharmacy Technician Registration No. TCH 97205

Respondent.

Case No. 6739

OAH No. 2019080389

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 January 23, 2020.

It is so ORDERED on December 24, 2019.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA



By

Greg Lippe
Board President

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

In the Matter of the Accusation Against:

ANTWONE M. SHIELDS, Respondent

Agency Case No. 6739

OAH Case No. 2019080389

PROPOSED DECISION

Wim van Rooyen, Administrative Law Judge, Office of Administrative Hearings (OAH), State of California, heard this matter on October 3, 2019, in Sacramento, California.

Mabel Lew, Deputy Attorney General, represented Anne Sodergren (complainant), Interim Executive Officer of the Board of Pharmacy (Board), Department of Consumer Affairs, State of California.

Antwone M. Shields (respondent) represented himself.

Evidence was received, the record closed, and the matter submitted for decision on October 3, 2019.

FACTUAL FINDINGS

Jurisdiction

1. On January 19, 2010, the Board issued Pharmacy Technician Registration Number TCH 97205 (registration) to respondent. That registration will expire on January 31, 2020, unless renewed or revoked.

2. On July 25, 2019, complainant, in her official capacity, filed the Accusation. Complainant sought to discipline respondent's registration pursuant to Business and Professions Code¹ section 4301, subdivisions (f) (commission of an act involving moral turpitude) and (l) (conviction of a crime substantially related to the qualifications, functions, and duties of a pharmacy technician), based on two criminal convictions discussed below. Additionally, complainant sought an award of the Board's reasonable costs of investigation and enforcement of the case pursuant to section 125.3.

3. Respondent timely filed a Notice of Defense. Thereafter, the matter was set for an evidentiary hearing before an Administrative Law Judge of the OAH, an independent adjudicative agency of the State of California, pursuant to Government Code section 11500 et seq.

¹ All further references are to the Business and Professions Code, unless otherwise noted.

Complainant's Evidence

RESPONDENT'S CONVICTIONS

4. On April 9, 2019, in the Superior Court of California, County of Yolo, Case No. CRF-2019-74-1, respondent was convicted on a plea of no contest of willfully inflicting corporal injury resulting in a traumatic condition on the parent of respondent's child in violation of Penal Code section 273.5, subdivision (a), and vandalism in violation of Penal Code section 594, subdivisions (a) & (b)(1), both misdemeanors. Respondent was sentenced to 45 days in jail. He was also ordered to serve 36 months of informal probation; perform eight hours of community service; attend 52 weeks of domestic violence/anger management classes; and pay \$2,500 in court fees/fines.

5. Respondent and a female acquaintance (FA) have a daughter together. Respondent's convictions arose from two separate incidents involving FA, which took place on November 12, 2018, and January 1, 2019, respectively.

On November 12, 2018, FA summoned police to her apartment. Upon arrival, the officer found FA visibly upset and crying. She had an oval-shaped bite impression on the center of her chest, which was swollen and raised. She also had some missing nail tips from fingers, and visibly reacted with pain when the officer examined her scalp. FA informed the officer that respondent had come to her apartment earlier that day to visit their infant daughter. That evening, FA and respondent started having consensual sex, with their daughter on the floor next to the bed. However, during that encounter, respondent began choking her to the point of being unable to breathe, bit her on her chest, and struck her multiple times on the back of her head. FA's statements were consistent with the injuries observed by the officer.

On January 1, 2019, FA arrived at the police department in a state of hysteria, speeding through the parking lot and honking her car's horn. She reported that respondent had again come to her apartment to visit their daughter. After an argument ensued, respondent grabbed their daughter, as well as FA's cell phone and computer tablet, and headed for the front door. FA was able to grab her daughter from respondent's arms as he left the apartment, but respondent threw FA's cell phone and computer tablet into the apartment complex pool. Subsequently, police traveled to FA's apartment and, consistent with FA's account, located her cell phone and computer tablet at the bottom of the apartment complex pool.

TESTIMONY BY BOARD INSPECTOR STEVEN KYLE

6. Mr. Kyle has been a Board inspector for five years. He has been involved in over 100 investigations of pharmacists, pharmacy technicians, and pharmacies. He holds a Doctor of Pharmacy degree from the University of the Pacific in Stockton, California, and practiced as a licensed California pharmacist for 18 years prior to starting work at the Board.

7. Mr. Kyle is familiar with the duties of a pharmacy technician, which include taking prescriptions from patients, entering orders, pulling prescription drugs, counting pills and tablets, and labeling prescription vials to be checked by the pharmacist. Pharmacy technicians are required to be honest, have good character, and possess sound judgment, because they have access to controlled substances, dangerous drugs, and patients' confidential information. Additionally, pharmacy technicians must have an even temperament, because they work closely with the public, including at times difficult and irate patients. Pharmacy technicians who engage in domestic violence or vandalism potentially pose a threat to public safety

and welfare, because such behavior suggests poor judgment and a tendency to escalate, rather than diffuse, conflict and violence.

Respondent's Evidence

8. Respondent first met FA in 2011. They had an "off and on" relationship, consisting of "consensual fun." Their habit was to meet up, "take some shots" and "do what adults do." However, respondent also had other relationships, including one with another woman that he considered his primary relationship.

9. After FA became pregnant with respondent's child, they agreed on an abortion. However, FA later "reneged on that agreement" and decided to keep the child. Since then, FA has been very demanding, insisting that respondent visit her and his child more often.

10. As for the November 12, 2018 incident, respondent denied choking, biting, hitting, or being violent towards FA. Although they were "pretty loud," they merely drank alcohol and had consensual sex. He never caused any visible injuries, and FA never asked him to leave. He recalled "fleeing the apartment," but "not due to any misconduct." According to respondent, FA manufactured her account of domestic violence, because she was upset that she was not the "chosen one."

11. As to the January 1, 2019 incident, respondent denied grabbing their daughter or acting violently towards FA. After spending time with his daughter, respondent and FA "took some shots" and had sex. At some point, his phone slipped out of his pocket. FA commented on the "hickies" on respondent's neck, observing that respondent "must have had a good New Year's Eve," and an argument ensued. Respondent countered that FA slept with multiple men herself and should have

aborted their child. However, according to respondent, he was not angry and merely "spoke freely" and exercised his First Amendment rights.

Respondent tried to leave, but FA would not let him get his phone. Consequently, he grabbed her cell phone and computer tablet in an attempt to "bargain" with her. Respondent admitted subsequently throwing FA's cell phone and computer tablet in the pool. However, he emphasized that he was not angry and did not intend to destroy the devices. He explained that he did not know that water would harm or destroy the electronic devices, because such devices can be waterproof. He also denied taking the devices to prevent FA from summoning the police.

12. Respondent strongly disagrees with the charges he faced following the above-mentioned incidents. He initially hired a private criminal defense attorney, but ultimately decided to enter a no contest plea after he could no longer afford that attorney. Respondent conceded that he could have been appointed a public defender, but thought a private attorney would be better. Respondent does not have any remorse about the incidents, because "there is nothing to be remorseful about." Indeed, he resents being required to attend domestic violence/anger management classes, because he "did nothing wrong." However, he bears some responsibility for "choosing the wrong girl."

13. Respondent admitted that he had a prior May 2, 2013 misdemeanor conviction for carrying a loaded gun in his vehicle. He explained that he was a licensed security guard at the time, but was not licensed to carry a gun. He bought the gun "off the street" and carried it for his own protection in Oakland, California. He was unaware that the gun he purchased had been previously stolen in a residential burglary in Oakland.

14. Respondent has complied with all conditions of his current probation, which terminates around April 2022. He is attending the required domestic violence/anger management classes and is current on his payment plan for the court fees/fines. He does not receive any additional treatment or therapy.

15. Respondent previously worked as a pharmacy technician for a CVS store in San Francisco, but ultimately resigned that job due to the long commute from Sacramento. Following his convictions, respondent worked for short periods at United Cerebral Palsy, an organization transporting cerebral palsy patients to and from programs; Amazon; Ryder, a company renting and selling used trucks; and Paratransit, an entity transporting disabled and elderly individuals. Respondent was recently offered a pharmacy technician position with CVS in the Sacramento area, which he hopes to accept if his registration issues are resolved. He believes he "deserves a chance," especially because the incidents with FA never affected his work with patients as a pharmacy technician.

Discussion

16. California Code of Regulations, title 16, section 1769, subdivision (c), sets forth criteria for evaluating the rehabilitation of a registrant who has been convicted of a crime. These criteria include: (1) nature and severity of the act(s) or offense(s); (2) total criminal record; (3) the time that has elapsed since commission of the act(s) or offense(s); (4) whether the registrant has complied with all terms of parole, probation, restitution or any other sanctions lawfully imposed against the registrant; and (5) evidence, if any, of rehabilitation submitted by the registrant.

17. Respondent's convictions involving domestic violence and vandalism are serious. They suggest poor judgment, an inability to appropriately deal with conflict,

and a tendency towards violence, which place pharmacy patients and the public at risk of harm. Although the underlying incidents did not occur at work, the Board need not wait until patient harm occurs before imposing discipline. (*Griffiths v. Superior Court* (2002) 96 Cal.App.4th 757, 772.) Respondent also has a conviction for carrying a loaded gun in his vehicle, raising further concerns regarding respondent's temperament and judgment.

Additionally, respondent's April 9, 2019 convictions are very recent. Although respondent has thus far complied with all probation requirements, he will remain on informal probation until April 2022. When a person is on criminal probation, rehabilitation efforts are accorded less weight, "[s]ince persons under the direct supervision of correctional authorities are required to behave in exemplary fashion. . ." (*In re Gossage* (2000) 23 Cal.4th 1080, 1099.)

Moreover, respondent presented no evidence of meaningful rehabilitation. He reluctantly attends court-ordered domestic violence/anger management classes, but does not attend any additional treatment or therapy. He accepted no responsibility, displayed no remorse, and improperly attempted to impeach his own convictions by accusing FA of lying to the police notwithstanding the overwhelming physical evidence supporting her claims. (*Arneson v. Fox* (1980) 28 Cal.3d 440, 449.) Finally, respondent frequently provided conflicting testimony, e.g., stating that he fled the apartment, but insisting he did nothing wrong; asserting he was not angry at FA yet insulting her and their child, and throwing FA's phone and tablet in the pool. Respondent's claim that he did not know the pool water would harm or destroy FA's electronics strained credulity and further demonstrated his unwillingness to take responsibility for his actions. (*Seide v. Com. of Bar Examiners of the State Bar of Cal.* (1989) 49 Cal.3d 933, 940 ["Fully

acknowledging the wrongfulness of [one's] actions is an essential step towards rehabilitation").)

18. In sum, the overwhelming weight of the evidence shows that respondent is not sufficiently rehabilitated. Given his poor judgment and violent temperament, revocation of respondent's registration is necessary to protect the public interest.

Costs

19. Pursuant to section 125.3, subdivision (a), the Board may recover reasonable costs of the investigation and enforcement of a case. Complainant here incurred \$3,712.50 in enforcement costs. These costs are supported by a Certification of Prosecution Costs: Declaration of Mabel Lew, and are accompanied by documents describing the general tasks performed, the time spent on each task, and the method of calculating the costs. The costs of enforcement totaling \$3,712.50 are reasonable.

20. In *Zuckerman v. State Board of Chiropractic Examiners* (2002) 29 Cal.4th 32, the California Supreme Court set forth guidelines for determining whether the costs should be assessed in the particular circumstances of each case. These factors include whether the licensee has been successful at hearing in getting charges dismissed or reduced, the licensee's subjective good faith belief in the merits of his position, whether the licensee has raised a colorable challenge to the proposed discipline, the licensee's financial ability to pay, and whether the scope of the investigation was appropriate to the alleged misconduct.

21. Here, respondent was not successful in getting charges dismissed or reduced; he raised no colorable challenge to revocation of his registration; he presented no evidence of inability to pay; and the scope of investigation was

appropriate. Consequently, respondent shall pay the Board's enforcement costs in full should he seek reinstatement of his registration in the future.

LEGAL CONCLUSIONS

1. "Protection of the public shall be the highest priority for the California State Board of Pharmacy in exercising its licensing, regulatory, and disciplinary functions. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount." (§ 4001.1.)

2. Complainant bears the burden of proving each of the grounds for discipline alleged in the Accusation by clear and convincing evidence. (*Ettinger v. Board of Medical Quality Assurance* (1982) 135 Cal.App.3d 853.) Clear and convincing evidence requires a finding of high probability, or proof that is so clear as to leave no substantial doubt, sufficiently strong to command the unhesitating assent of every reasonable mind. (*Katie V. v. Superior Court* (2005) 130 Cal.App.4th 586, 594.)

3. Section 4301 authorizes the Board to "take action against any holder of a license who is guilty of unprofessional conduct . . . Unprofessional conduct includes, but is not limited to, any of the following: . . . (f) The commission of any act involving moral turpitude . . . 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 . . . (l) The conviction of a crime substantially related to the qualifications, functions, and duties of a licensee under this chapter . . ." Additionally, California Code of Regulations, title 16, section 1770, provides that "a crime or act shall be considered substantially 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.”

4. Cause exists to discipline respondent’s registration pursuant to section 4301, subdivision (f). Based on Factual Findings 4 and 5, respondent pled no contest to willfully inflicting corporal injury resulting in a traumatic condition on FA, the mother of his child, in violation of Penal Code section 273.5, subdivision (a). By virtue of that plea, respondent admitted to committing an act involving moral turpitude. (*People v. Marlin* (2004) 124 Cal.App.4th 559, 573 [holding that a guilty or no contest plea amounts to “an admission of every element of the crime and is the equivalent of a conviction”].) Even though the act was a misdemeanor and not committed in the course of respondent’s duties as a pharmacy technician, it constitutes unprofessional conduct as defined in section 4301, subdivision (f).

5. Cause also exists to discipline respondent’s registration pursuant to section 4301, subdivision (l). As outlined in Factual Findings 4 and 5, respondent was convicted of two misdemeanors: willfully inflicting corporal injury resulting in a traumatic condition on FA, the mother of his child, in violation of Penal Code section 273.5, subdivision (a), and vandalism in violation of Penal Code section 594, subdivisions (a) & (b)(1). Pursuant to California Code of Regulations, title 16, section 1770, and based on Factual Findings 6 and 7, those convictions are substantially related to the qualifications, functions, and duties of a pharmacy technician, because they are indicative of poor judgment and a tendency to escalate, rather than diffuse, conflict and violence. Because pharmacy technicians are required to have an even temperament to deal with the public, these convictions evidence to a substantial degree respondent’s unfitness to perform the functions authorized by his registration in a manner consistent with the public health, safety, or welfare. Consequently,

respondent's substantially related convictions constitute unprofessional conduct as defined in section 4301, subdivision (I).

6. California Code of Regulations, title 16, section 1769, subdivision (c), sets forth criteria for evaluating the rehabilitation of a registrant who has been convicted of a crime. Based on all the Factual Findings, and specifically Factual Findings 16 through 18, revocation of respondent's registration is necessary to protect public health, safety, and welfare.

7. Pursuant to section 125.3, subdivision (a), the Board may recover reasonable costs of the investigation and enforcement of a case. As discussed in Factual Findings 19 through 21, complainant's requested enforcement costs of \$3,712.50 are reasonable. Consequently, respondent shall pay these costs in the event his registration is reinstated in the future.

ORDER

1. Pharmacy Technician Registration Number TCH 97205, issued to respondent Antwone M. Shields, is REVOKED.

2. Respondent shall relinquish his registration, including any indicia of registration issued by the Board, to the Board within 10 days of the effective date of this decision.

3. Respondent may not reapply or petition the Board for reinstatement of his revoked registration for three years from the effective date of this decision.

4. As a condition precedent to reinstatement of his revoked registration, respondent shall reimburse the Board for its costs of investigation and prosecution in

the amount of \$3,712.50. That amount shall be paid in full prior to the reinstatement of his registration unless otherwise ordered by the Board.

DATE: October 18, 2019

DocuSigned by:
Wim van Rooyen
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WIM VAN ROOYEN

Administrative Law Judge

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

11 In the Matter of the Accusation Against:

Case No. 6739

12 **ANTWONE M. SHIELDS**
13 **4451 Gateway Park Boulevard, Apt. 328**
14 **Sacramento, CA 95834**

A C C U S A T I O N

15 **Pharmacy Technician Registration No. TCH 97205**

16 Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Anne Sodergren (“Complainant”) brings this Accusation solely in her official
20 capacity as the Interim Executive Officer of the Board of Pharmacy (“Board”), Department of
21 Consumer Affairs.

22 2. On or about January 19, 2010, the Board of Pharmacy issued Pharmacy Technician
23 Registration Number TCH 97205 to Antwone M. Shields (“Respondent”). The Pharmacy
24 Technician Registration was in full force and effect at all times relevant to the charges brought
25 herein and will expire on January 31, 2020, unless renewed.

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1 **JURISDICTION**

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

5 4. Code section 4300 states in pertinent part:

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

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

10 (1) Suspending judgment.

11 (2) Placing him or her upon probation.

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

13 (4) Revoking his or her license.

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

16 5. Code section 4300.1 states:

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

23 **STATUTORY PROVISIONS**

24 6. Section 4301 of the Code states in pertinent part:

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

28 ...

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

20 ...

21 7. Code section 490 states, in pertinent part:

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

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

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

38 ...

COST RECOVERY

39 8. Code section 125.3 provides, in pertinent part, that the Board may request the
40 administrative law judge to direct a licentiate found to have committed a violation or violations of
41 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
42 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being

1 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
2 included in a stipulated settlement.

3 **FIRST CAUSE FOR DISCIPLINE**

4 (Criminal Conviction)

5 9. Respondent is subject to disciplinary action pursuant to Code sections 4301(l) and
6 490 on the grounds of unprofessional conduct, in that Respondent committed crimes substantially
7 related to the qualifications, functions, and duties of a registered pharmacy technician.
8 Specifically, on or about April 9, 2019, in a criminal proceeding entitled *People of the State of*
9 *California vs. Antwone Shields*, Superior Court of California, County of Yolo, Case No. CRF19-
10 74, Respondent was convicted by the court on his plea of nolo contendere of violating Penal Code
11 section 273.5(a) [Infliction of Corporal Injury on Parent of Defendant's Child], and Penal Code
12 section 594(a)(b)(1) [Vandalism], both misdemeanors. Respondent was sentenced to 36 months
13 of informal probation, ordered to serve 45 day in jail, pay \$2,500.00 in fees and fines, attend 52
14 weeks of domestic violence counseling, and perform 8 hours community service at a non-profit
15 organization.

16 10. The circumstances of the crime involving domestic violence are that on November
17 12, 2018, Respondent went to Victim's house to visit their 9 month old daughter. While having
18 consensual sexual relations with Victim, Respondent choked Victim to the point where she was
19 unable to breathe, bit her on her chest, and struck her multiple times on the back of her head.

20 11. The circumstances of the crime involving vandalism are on January 1, 2019,
21 Respondent went to Victim's house and tossed her electronic devices into a swimming pool.
22 Then Respondent re-entered her house by ripping off her window screen.

23 **SECOND CAUSE FOR DISCIPLINE**

24 (Acts Involving Moral Turpitude)

25 12. Respondent is subject to disciplinary action pursuant to Code section 4301(f) on the
26 grounds of unprofessional conduct, in that he committed acts involving moral turpitude, as more
27 particularly set forth above in paragraphs 9-11.

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PRAYER

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

1. Revoking or suspending Pharmacy Technician Registration Number TCH 97205, issued to Antwone M. Shields;

2. Ordering Antwone M. Shields to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,

3. Taking such other and further action as deemed necessary and proper.

DATED: July 25, 2019 _____



ANNE SODERGREN
Interim Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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