

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

In the Matter of the Accusation Against:

CHRISTY LYNN ALEXANDER-PEREZ, Respondent

Pharmacist License No. RPH 53901

Agency Case No. 7348

OAH No. 202209414

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective at 5:00 p.m. on January 4, 2023.

It is so ORDERED on December 5, 2022.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By

A handwritten signature in black ink, appearing to read "Seung W. Oh", is written over a light gray rectangular background.

Seung W. Oh, Pharm.D.
Board President

1 ROB BONTA
Attorney General of California
2 DAVID E. BRICE
Supervising Deputy Attorney General
3 PATRICIA WEBBER HEIM
Deputy Attorney General
4 State Bar No. 230889
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 210-7519
Facsimile: (916) 327-8643
7 E-mail: Patricia.Heim@doj.ca.gov
Attorneys for Complainant
8

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10 **BEFORE THE**
BOARD OF PHARMACY
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA
12

13 In the Matter of the Accusation Against:

14 **CHRISTY LYNN ALEXANDER-PEREZ**
15 **974 Park Terrance Drive**
Galt, CA 95632

16 **Pharmacist License No. RPH 53901**

17 Respondent.
18

Case No. 7348

OAH No. 2022090414

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

19
20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
21 entitled proceedings that the following matters are true:

22 **PARTIES**

23 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy
24 (Board). She brought this action solely in her official capacity and is represented in this matter by
25 Rob Bonta, Attorney General of the State of California, by Patricia Webber Heim, Deputy
26 Attorney General.

27 2. Christy Lynn Alexander-Perez (Respondent) is representing herself in this proceeding
28 and has chosen not to exercise her right to be represented by counsel.

3. On or about September 5, 2002, the Board issued Pharmacist License No. RPH 53901 to Respondent. The Pharmacist License was in full force and effect at all times relevant to the charges brought in Accusation No. 7348, and will expire on June 30, 2024, unless renewed. The Pharmacist License was suspended until further order of the Board on September 29, 2022, pursuant to a stipulation and interim suspension order under Business and Professions Code section 494.

JURISDICTION

4. Accusation No. 7348 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on September 15, 2022. Respondent timely filed her Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 7348 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, and understands the charges and allegations in Accusation No. 7348. Respondent has also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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1 **CULPABILITY**

2 9. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. 7348.

4 10. Respondent agrees that her Pharmacist License is subject to discipline and she agrees
5 to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

6 **CONTINGENCY**

7 11. This stipulation shall be subject to approval by the Board. Respondent understands
8 and agrees that counsel for Complainant and the staff of the Board may communicate directly
9 with the Board regarding this stipulation and settlement, without notice to or participation by
10 Respondent. By signing the stipulation, Respondent understands and agrees that she may not
11 withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers
12 and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the
13 Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this
14 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not
15 be disqualified from further action by having considered this matter.

16 12. The parties understand and agree that Portable Document Format (PDF) and facsimile
17 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
18 signatures thereto, shall have the same force and effect as the originals.

19 13. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
20 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
21 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
22 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
23 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
24 writing executed by an authorized representative of each of the parties.

25 14. In consideration of the foregoing admissions and stipulations, the parties agree that
26 the Board may, without further notice or formal proceeding, issue and enter the following
27 Disciplinary Order:

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DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Pharmacist License No. RPH 53901 issued to Respondent Christy Lynn Alexander-Perez is revoked. However, the revocation is stayed and Respondent is placed on probation for five (5) years on the following terms and conditions:

1. Suspension

As part of probation, Respondent is suspended from practice as a Registered Pharmacist until deemed safe to practice by the Pharmacy Recovery Program, beginning the effective date of this decision.

During suspension, Respondent shall not enter any pharmacy area or any portion of the licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug retailer, or any other distributor of drugs that is licensed by the Board, or any manufacturer, or any area where dangerous drugs and/or dangerous devices or controlled substances are maintained.

Respondent shall not practice pharmacy nor do any act involving drug selection, selection of stock, manufacturing, compounding, dispensing or patient consultation; nor shall Respondent manage, administer, or be a consultant to any licensee of the Board, or have access to or control the ordering, distributing, manufacturing or dispensing of dangerous drugs and/or dangerous devices or controlled substances.

During this suspension, Respondent shall not engage in any activity that requires the professional judgment of and/or licensure as a Registered Pharmacist. Respondent shall not direct or control any aspect of the practice of pharmacy or of the manufacturing, distributing, wholesaling, or retailing of dangerous drugs and/or dangerous devices or controlled substances.

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

During the period of suspension, Respondent shall not leave California for any period exceeding ten (10) days, regardless of purpose (including vacation). Any such absence in excess of ten (10) days during the period of suspension shall be considered a violation of probation, and shall toll the suspension, i.e., the suspension shall be extended by one day for each day over ten (10) days Respondent is absent from California. During any such period of tolling of suspension,

Respondent must nonetheless comply with all terms and conditions of probation, unless Respondent is notified otherwise in writing by the Board or its designee.

Respondent shall notify the Board or its designee in writing within ten (10) days of any departure from California, for any period, and shall further notify the Board or its designee in writing within ten (10) days of return. Failure to timely provide such notification(s) shall be considered a violation of probation. Upon such departure and return, Respondent shall not resume practice until notified by the Board or its designee that the period of suspension has been satisfactorily completed.

2. Obey All Laws

Respondent shall obey all state and federal laws and regulations.

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

- an arrest or issuance of a criminal complaint for violation of any provision of the Pharmacy Law, state and federal food and drug laws, or state and federal controlled substances laws
- a plea of guilty, or nolo contendere, no contest, or similar, in any state or federal criminal proceeding to any criminal complaint, information or indictment
- a conviction of any crime
- the filing of a disciplinary pleading, issuance of a citation, or initiation of another administrative action filed by any state or federal agency which involves Respondent's license or which is related to the practice of pharmacy or the manufacturing, obtaining, handling, distributing, billing, or charging for any drug, device or controlled substance.

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

3. Report to the Board

Respondent shall report to the Board quarterly, on a schedule as directed by the Board or its designee. The report shall be made either in person or in writing, as directed. Among other requirements, Respondent shall state in each report under penalty of perjury whether there has

1 been compliance with all the terms and conditions of probation.

2 Failure to submit timely reports in a form as directed shall be considered a violation of
3 probation. Any period(s) of delinquency in submission of reports as directed may be added to the
4 total period of probation. Moreover, if the final probation report is not made as directed,
5 probation shall be automatically extended until such time as the final report is made and accepted
6 by the Board.

7 **4. Interview with the Board**

8 Upon receipt of reasonable prior notice, Respondent shall appear in person for interviews
9 with the Board or its designee, at such intervals and locations as are determined by the Board or
10 its designee. Failure to appear for any scheduled interview without prior notification to Board
11 staff, or failure to appear for two (2) or more scheduled interviews with the Board or its designee
12 during the period of probation, shall be considered a violation of probation.

13 **5. Cooperate with Board Staff**

14 Respondent shall timely cooperate with the Board's inspection program and with the
15 Board's monitoring and investigation of Respondent's compliance with the terms and conditions
16 of her probation, including but not limited to: timely responses to requests for information by
17 Board staff; timely compliance with directives from Board staff regarding requirements of any
18 term or condition of probation; and timely completion of documentation pertaining to a term or
19 condition of probation. Failure to timely cooperate shall be considered a violation of probation.

20 **6. Continuing Education**

21 Respondent shall provide evidence of efforts to maintain skill and knowledge as a
22 pharmacist as directed by the Board or its designee.

23 **7. Reporting of Employment and Notice to Employers**

24 During the period of probation, Respondent shall notify all present and prospective
25 employers of the decision in case number 7348 and the terms, conditions and restrictions imposed
26 on Respondent by the decision, as follows:

27 Within thirty (30) days of the effective date of this decision, and within ten (10) days of
28 undertaking any new employment, Respondent shall report to the Board in writing the name,

1 physical address, and mailing address of each of her employer(s), and the name(s) and telephone
2 number(s) of all of her direct supervisor(s), as well as any pharmacist(s)-in- charge, designated
3 representative(s)-in-charge, responsible manager, or other compliance supervisor(s) and the work
4 schedule, if known. Respondent shall also include the reason(s) for leaving the prior
5 employment. Respondent shall sign and return to the Board a written consent authorizing the
6 Board or its designee to communicate with all of Respondent's employer(s) and supervisor(s),
7 and authorizing those employer(s) or supervisor(s) to communicate with the Board or its
8 designee, concerning Respondent's work status, performance, and monitoring. Failure to comply
9 with the requirements or deadlines of this condition shall be considered a violation of probation.

10 Within thirty (30) days of the effective date of this decision, and within fifteen (15) days of
11 Respondent undertaking any new employment, Respondent shall cause (a) her direct supervisor,
12 (b) her pharmacist-in-charge, designated representative-in-charge, responsible manager, or other
13 compliance supervisor, and (c) the owner or owner representative of her employer, to report to the
14 Board in writing acknowledging that the listed individual(s) have read the decision in case
15 number 7348, and terms and conditions imposed thereby. If one person serves in more than one
16 role described in (a), (b), or (c), the acknowledgment shall so state. It shall be the Respondent's
17 responsibility to ensure that these acknowledgment(s) are timely submitted to the Board. In the
18 event of a change in the person(s) serving the role(s) described in (a), (b), or (c) during the term
19 of probation, Respondent shall cause the person(s) taking over the role(s) to report to the Board in
20 writing within fifteen (15) days of the change acknowledging that he or she has read the decision
21 in case number 7348, and the terms and conditions imposed thereby.

22 If Respondent works for or is employed by or through an employment service, Respondent
23 must notify the person(s) described in (a), (b), and (c) above at every entity licensed by the Board
24 of the decision in case number 7348, and the terms and conditions imposed thereby in advance of
25 Respondent commencing work at such licensed entity. A record of this notification must be
26 provided to the Board upon request.

27 Furthermore, within thirty (30) days of the effective date of this decision, and within fifteen
28 (15) days of Respondent undertaking any new employment by or through an employment service,

Respondent shall cause the person(s) described in (a), (b), and (c) above at the employment service to report to the Board in writing acknowledging that he or she has read the decision in case number, and the terms and conditions imposed thereby. It shall be Respondent's responsibility to ensure that these acknowledgment(s) are timely submitted to the Board.

Failure to timely notify present or prospective employer(s) or failure to cause the identified person(s) with that/those employer(s) to submit timely written acknowledgments to the Board shall be considered a violation of probation.

"Employment" within the meaning of this provision includes any full-time, part-time, temporary, relief, or employment/management service position as a Registered Pharmacist., or any position for which a Registered Pharmacist is a requirement or criterion for employment, whether the Respondent is an employee, independent contractor or volunteer.

8. Notification of Change(s) in Name, Address(es), or Phone Number(s)

Respondent shall further notify the Board in writing within ten (10) days of any change in name, residence address, mailing address, e-mail address or phone number.

Failure to timely notify the Board of any change in employer, name, address, or phone number shall be considered a violation of probation.

9. Restrictions on Supervision and Oversight of Licensed Facilities

During the period of probation, Respondent shall not supervise any intern pharmacist, be the pharmacist-in-charge, designated representative-in-charge, responsible manager or other compliance supervisor of any entity licensed by the Board, nor serve as a consultant. Assumption of any such unauthorized supervision responsibilities shall be considered a violation of probation.

10. Reimbursement of Board Costs

As a condition precedent to successful completion of probation, Respondent shall pay to the Board its costs of investigation and prosecution in the amount of \$11,465.00. Respondent shall make said payments as follows:

There shall be no deviation from this schedule absent prior written approval by the Board or its designee. Failure to pay costs by the deadline(s) as directed shall be considered a violation of probation.

Respondent shall be permitted to pay these costs in a payment plan approved by the Board or its designee, so long as full payment is completed no later than one (1) year prior to the end date of probation.

11. Probation Monitoring Costs

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

12. Status of License

Respondent shall, at all times while on probation, maintain an active, current Pharmacist License with the Board, including any period during which suspension or probation is tolled. Failure to maintain an active, current Pharmacist License shall be considered a violation of probation.

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

13. License Surrender While on Probation/Suspension

Following the effective date of this decision, should Respondent cease practice due to retirement or health, or be otherwise unable to satisfy the terms and conditions of probation, Respondent may relinquish her license, including any indicia of licensure issued by the Board, along with a request to surrender the license. The Board or its designee shall have the discretion whether to accept the surrender or take any other action it deems appropriate and reasonable. Upon formal acceptance of the surrender of the license, Respondent will no longer be subject to the terms and conditions of probation. This surrender constitutes a record of discipline and shall become a part of the Respondent's license history with the Board.

Upon acceptance of the surrender, Respondent shall relinquish her pocket and/or wall license, including any indicia of licensure not previously provided to the Board within ten (10)

1 days of notification by the Board that the surrender is accepted if not already provided.

2 Respondent may not reapply for any license from the Board for three (3) years from the effective
3 date of the surrender. Respondent shall meet all requirements applicable to the license sought as
4 of the date the application for that license is submitted to the Board, including any outstanding
5 costs.

6 **14. Practice Requirement – Extension of Probation**

7 Except during periods of suspension, Respondent shall, at all times while on probation, be
8 employed as a Registered Pharmacist in California for a minimum of 80 hours per calendar
9 month. Any month during which this minimum is not met shall extend the period of probation by
10 one month. During any such period of insufficient employment, Respondent must nonetheless
11 comply with all terms and conditions of probation, unless Respondent receives a waiver in
12 writing from the Board or its designee.

13 If Respondent does not practice as a Registered Pharmacist in California for the minimum
14 number of hours in any calendar month, for any reason (including vacation), Respondent shall
15 notify the Board in writing within ten (10) days of the conclusion of that calendar month. This
16 notification shall include at least: the date(s), location(s), and hours of last practice; the reason(s)
17 for the interruption or reduction in practice; and the anticipated date(s) on which Respondent will
18 resume practice at the required level. Respondent shall further notify the Board in writing within
19 ten (10) days following the next calendar month during which Respondent practices as a
20 Registered Pharmacist in California for the minimum of hours. Any failure to timely provide
21 such notification(s) shall be considered a violation of probation.

22 It is a violation of probation for Respondent's probation to be extended pursuant to the
23 provisions of this condition for a total period, counting consecutive and non-consecutive months,
24 exceeding thirty-six (36) months. The Board or its designee may post a notice of the extended
25 probation period on its website.

26 **15. Violation of Probation**

27 If Respondent has not complied with any term or condition of probation, the Board shall
28 have continuing jurisdiction over Respondent, and the Board shall provide notice to Respondent

1 that probation shall automatically be extended, until all terms and conditions have been satisfied
2 or the Board has taken other action as deemed appropriate to treat the failure to comply as a
3 violation of probation, to terminate probation, and to impose the penalty that was stayed. The
4 Board or its designee may post a notice of the extended probation period on its website.

5 If Respondent violates probation in any respect, the Board, after giving Respondent notice
6 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that
7 was stayed. If a petition to revoke probation or an accusation is filed against Respondent during
8 probation, or the preparation of an accusation or petition to revoke probation is requested from
9 the Office of the Attorney General, the Board shall have continuing jurisdiction and the period of
10 probation shall be automatically extended until the petition to revoke probation or accusation is
11 heard and decided.

12 **16. Completion of Probation**

13 Upon written notice by the Board or its designee indicating successful completion of
14 probation, Respondent's license will be fully restored.

15 **17. Pharmacists Recovery Program (PRP)**

16 By no later than ten (10) days after the effective date of this decision, Respondent shall
17 have completed all of the following: contacted the Pharmacists Recovery Program (PRP) for
18 evaluation; enrolled in the PRP; completed, signed, and returned the treatment contract as well as
19 any addendums required or suggested by the PRP; successfully completed registration for any
20 drug or alcohol testing mandated by the treatment contract and/or by enrollment in the PRP; and
21 begun compliance with the drug or alcohol testing protocol(s). Respondent shall successfully
22 participate in the PRP and complete the treatment contract and any addendums required or
23 suggested by the PRP. The costs for PRP participation shall be borne by the Respondent.

24 If Respondent is currently enrolled in the PRP, said participation is now mandatory and as
25 of the effective date of this decision is no longer considered a self-referral under Business and
26 Professions Code section 4362 (a)(2). Respondent shall successfully participate in and complete
27 his or her current contract and any subsequent addendums with the PRP.

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Respondent shall pay administrative fees as invoiced by the PRP or its designee. Fees not timely paid to the PRP shall constitute a violation of probation. The Board will collect unpaid administrative fees as part of the annual probation monitoring costs if not submitted to the PRP.

Any of the following shall result in the automatic suspension of practice by Respondent and shall be considered a violation of probation:

Failure to contact, complete enrollment, and execute and return the treatment contract with the PRP, including any addendum(s), within ten (10) days of the effective date of the decision as directed by the PRP;

Failure to complete registration for any drug or alcohol testing mandated by the treatment contract and/or by the PRP, and begin compliance with the testing protocol(s), within ten (10) days of the effective date of the decision as directed by the PRP;

Failure to comply with testing protocols regarding daily check-in and/or failure to complete a mandated test as directed by the PRP;

Any report from the PRP of material non-compliance with the terms and conditions of the treatment contract and/or any addendum(s); or

Termination by the PRP for non-compliance, failure to derive benefit, or as a public risk.

Respondent may not resume the practice of pharmacy until notified by the Board in writing.

Probation shall be automatically extended until Respondent successfully completes the PRP. The Board will provide notice of any such suspension or extension of probation.

During any suspension, Respondent shall not enter any pharmacy area or any portion of the licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug retailer, or any other distributor of drugs which is licensed by the Board, or any manufacturer, or any area where dangerous drugs and/or dangerous devices or controlled substances are maintained. Respondent shall not practice as a Registered Pharmacist nor do any act involving drug selection, selection of stock, manufacturing, compounding, dispensing or patient consultation; nor shall Respondent manage, administer, or be a consultant to any licensee of the Board, or have access to or control the ordering, distributing, manufacturing or dispensing of dangerous drugs and/or dangerous devices or controlled substances.

1 During any suspension, Respondent shall not engage in any activity that requires the
2 professional judgment of and/or licensure as a Registered Pharmacist. Respondent shall not
3 direct or control any aspect of the practice of pharmacy, or of the manufacturing, distributing,
4 wholesaling, or retailing of dangerous drugs and/or dangerous devices or controlled substances.

5 Failure to comply with any requirement or deadline stated by this term shall be considered a
6 violation of probation.

7 **18. Drug and Alcohol Testing**

8 Respondent, at her own expense, shall participate in testing as directed by the Board or its
9 designee for the detection of alcohol, controlled substances, and dangerous drugs and/or
10 dangerous devices. Testing protocols may include biological fluid testing (urine, blood),
11 breathalyzer, hair follicle testing, or other testing protocols as directed by the Board or its
12 designee. All testing must be pursuant to an observed testing protocol, unless Respondent is
13 informed otherwise in writing by the Board or its designee. Respondent may be required to
14 participate in testing for the entire probation period and frequency of testing will be determined
15 by the Board or its designee.

16 By no later than thirty (30) days after the effective date of this decision, Respondent shall
17 have completed all of the following tasks: enrolled and registered with an approved drug and
18 alcohol testing vendor; provided that vendor with any documentation, and any information
19 necessary for payment by Respondent; commenced testing protocols, including all required
20 contacts with the testing vendor to determine testing date(s); and begun testing. At all times,
21 Respondent shall fully cooperate with the testing vendor, and with the Board or its designee, with
22 regard to enrollment, registration, and payment for, and compliance with, testing. Any failure to
23 cooperate timely shall be considered a violation of probation.

24 Respondent may be required to test on any day, including weekends and holidays.
25 Respondent is required to make daily contact with the testing vendor to determine if a test is
26 required, and if a test is required must submit to testing on the same day.

27 Prior to any vacation or other period of absence from the area where the approved testing
28 vendor provides services, Respondent shall seek and receive approval from the Board or its

1 designee to use an alternate testing vendor to ensure testing can occur. Upon approval,
2 Respondent shall enroll and register with the approved alternate drug testing vendor, provide to
3 that alternate vendor any documentation required by the vendor, including any necessary payment
4 by Respondent. During the period of absence of the area, Respondent shall commence testing
5 protocols with the alternate vendor, including required daily contacts with the testing vendor to
6 determine if testing is required, and required testing. Any failure to timely seek or receive
7 approval from the Board or its designee, or to timely enroll and register with, timely commence
8 testing protocols with, or timely undergo testing with, the alternate testing vendor, shall be
9 considered a violation of probation.

10 Upon detection of an illicit drug, controlled substance or dangerous drug, the Board or its
11 designee may require Respondent to timely provide documentation from a licensed practitioner
12 authorized to prescribe the detected substance demonstrating that the substance was administered
13 or ingested pursuant to a legitimate prescription issued as a necessary part of treatment. All such
14 documentation shall be provided by Respondent within ten (10) days of being requested.

15 Any of the following shall be considered a violation of probation and shall result in
16 Respondent being immediately suspended from practice as a Registered Pharmacist until notified
17 by the Board in writing that she may resume practice: failure to timely complete all of the steps
18 required for enrollment/registration with the drug testing vendor, including making arrangements
19 for payment; failure to timely commence drug testing protocols; failure to contact the drug testing
20 vendor as required to determine testing date(s); failure to test as required; failure to timely supply
21 documentation demonstrating that a detected substance was taken pursuant to a legitimate
22 prescription issued as a necessary part of treatment; and/or detection through testing of alcohol, or
23 of an illicit drug, or of a controlled substance or dangerous drug absent documentation that the
24 detected substance was taken pursuant to a legitimate prescription and a necessary treatment. In
25 the event of a suspension ordered after detection through testing of alcohol, an illicit drug, or of a
26 controlled substance or dangerous drug absent documentation that the detected substance was
27 taken pursuant to a legitimate prescription and a necessary treatment, the Board or its designee
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1 shall inform Respondent of the suspension and inform her to immediately leave work, and shall
2 notify Respondent's employer(s) and work site monitor(s) of the suspension.

3 During any such suspension, Respondent shall not enter any pharmacy area or any portion
4 of the licensed premises of a wholesaler, third-party-logistics provider, veterinary food-animal
5 drug retailer, or any other distributor of drugs which is licensed by the Board, or any
6 manufacturer, or any area where dangerous drugs and/or dangerous devices or controlled
7 substances are maintained. Respondent shall not practice pharmacy nor do any act involving drug
8 selection, selection of stock, manufacturing, compounding, dispensing or patient consultation; nor
9 shall Respondent manage, administer, or be a consultant to any licensee of the Board, or have
10 access to or control the ordering, distributing, manufacturing or dispensing of dangerous drugs
11 and/or dangerous devices and controlled substances.

12 During any such suspension, Respondent shall not engage in any activity that requires the
13 professional judgment of and/or licensure as a Registered Pharmacist. Respondent shall not
14 direct or control any aspect of the practice of pharmacy, or of the manufacturing, distributing,
15 wholesaling, or retailing of dangerous drugs and/or dangerous devices.

16 Failure to comply with any such suspension shall be considered a violation of probation.
17 Failure to comply with any requirement or deadline stated by this term shall be considered a
18 violation of probation.

19 **19. Notification of Departure**

20 Prior to leaving the probationary geographic area designated by the Board or its designee
21 for a period greater than twenty-four (24) hours, Respondent shall notify the Board verbally and
22 in writing of the dates of departure and return. Failure to comply with this provision shall be
23 considered a violation of probation.

24 **20. Abstain from Drugs and Alcohol**

25 Respondent shall completely abstain from the possession or use of alcohol, controlled
26 substances, illicit drugs, dangerous drugs and/or dangerous devices, or their associated
27 paraphernalia, except when possessed or used pursuant to a legitimate prescription issued as a
28 necessary part of treatment. Respondent shall ensure that she is not in the same physical location

1 as individuals who are using illicit substances even if Respondent is not personally ingesting the
2 drugs. Any possession or use of alcohol, dangerous drugs and/or dangerous devices or controlled
3 substances, or their associated paraphernalia for which a legitimate prescription has not been
4 issued as a necessary part of treatment, or any physical proximity to persons using illicit
5 substances, shall be considered a violation of probation.

6 **21. Prescription Coordination and Monitoring of Prescription Use**

7 Within thirty (30) days of the effective date of this decision, Respondent shall submit to the
8 Board, for its prior approval, the name and qualifications of a single physician, nurse practitioner,
9 physician assistant, or psychiatrist of Respondent's choice, who shall be aware of the
10 Respondent's history with the use of alcohol, illicit drugs, controlled substances, and/or dangerous
11 drugs, and who will coordinate and monitor any prescriptions for Respondent for dangerous drugs
12 and/or dangerous devices, controlled substances or mood-altering drugs. The approved
13 practitioner shall be provided with a copy of the Board's Interim Suspension Order and decision.
14 A record of this notification must be provided to the Board or its designee upon request.
15 Respondent shall sign a release authorizing the practitioner to communicate with the Board or its
16 designee about Respondent's treatment(s). The coordinating physician, nurse practitioner,
17 physician assistant, or psychiatrist shall report to the Board on a quarterly basis for the duration of
18 probation regarding Respondent's compliance with this condition. If any substances considered
19 addictive have been prescribed, the report shall identify a program for the time limited use of any
20 such substances. The Board or its designee may require that the single coordinating physician,
21 nurse practitioner, physician assistant or psychiatrist be a specialist in addictive medicine, or
22 consult a specialist in addictive medicine. Should Respondent, for any reason, cease supervision
23 by the approved practitioner, Respondent shall notify the Board or its designee immediately and,
24 within thirty (30) days of ceasing supervision, submit the name of a replacement physician, nurse
25 practitioner, physician assistant, or psychiatrist of Respondent's choice to the Board or its
26 designee for its prior approval. Failure to timely submit the selected practitioner or replacement
27 practitioner to the Board or its designee for approval, or to ensure the required quarterly reporting
28 thereby, shall be considered a violation of probation.

1 If at any time an approved practitioner determines that Respondent is unable to practice
2 safely or independently as a Registered Pharmacist, the practitioner shall notify the Board or its
3 designee immediately by telephone and follow up by written letter within three (3) working days.
4 Upon notification from the Board or its designee of this determination, Respondent shall be
5 automatically suspended and shall not resume practice as a Registered Pharmacist until notified
6 by the Board or its designee that practice may be resumed.

7 During any suspension, Respondent shall not enter any pharmacy area or any portion of the
8 licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug
9 retailer, or any other distributor of drugs which is licensed by the Board, or any manufacturer, or
10 any area where dangerous drugs and/or dangerous devices or controlled substances are
11 maintained. Respondent shall not practice pharmacy nor do any act involving drug selection,
12 selection of stock, manufacturing, compounding, dispensing or patient consultation; nor shall
13 Respondent manage, administer, or be a consultant to any licensee of the Board, or have access to
14 or control the ordering, distributing, manufacturing or dispensing of dangerous drugs and/or
15 dangerous devices and controlled substances. Respondent shall not resume practice until notified
16 by the Board.

17 During any suspension, Respondent shall not engage in any activity that requires the
18 professional judgment and/or licensure as a Registered Pharmacist. Respondent shall not direct
19 or control any aspect of the practice of pharmacy or of the manufacturing, distributing,
20 wholesaling, or retailing of dangerous drugs and/or dangerous devices or controlled substances.

21 Failure to comply with any requirement or deadline stated by this term shall be considered a
22 violation of probation.

23 **22. Facilitated Group Recovery and/or Support Meetings**

24 Within thirty (30) days of the effective date of this decision, Respondent shall begin regular
25 attendance at a group recovery and/or support meeting that is run by a trained facilitator approved
26 in advance by the Board or its designee. The required frequency of group meeting attendance
27 shall be determined by the Board or its designee. Respondent shall continue regular attendance as
28 directed at an approved facilitated group meeting until the Board or its designee advises the

Respondent in writing that she may cease regular attendance. Respondent shall provide signed and dated documentation of attendance as required with each quarterly report. Failure to attend as required or to submit documentation of attendance shall be considered a violation of probation.

If Respondent is required to participate in the Pharmacist Recovery Program (PRP), compliance with this term can be demonstrated through that program. Where Respondent is enrolled in the PRP, participation as required in a facilitated group meeting approved by the PRP shall be sufficient for satisfaction of this requirement. Any deviation from participation requirements for the PRP-approved group shall be considered a violation of probation.

23. Attend Substance Abuse Recovery Relapse Prevention and Support Groups

Within thirty (30) days of the effective date of this decision, Respondent shall begin regular attendance at a recognized and established substance abuse recovery support group in California (e.g., Alcoholics Anonymous, Narcotics Anonymous, etc.) which has been approved by the Board or its designee. Respondent must attend the number of group meetings per week or month directed by the Board or its designee, which shall typically be at least one per week. Respondent shall continue regular attendance and submit signed and dated documentation confirming attendance with each quarterly report for the duration of probation. Failure to attend or submit documentation thereof shall be considered a violation of probation.

Where Respondent is enrolled in the PRP, participation as required in a recovery group meeting approved by the PRP shall be sufficient for satisfaction of this requirement. Any deviation from participation requirements for the PRP-approved group shall be considered a violation of probation.

24. Work Site Monitor

Within ten (10) days of the effective date of this decision, Respondent shall identify a work site monitor, for prior approval by the Board or its designee, who shall be responsible for supervising Respondent during working hours. Respondent shall be responsible for ensuring that the work site monitor reports in writing to the Board monthly or on another schedule as directed by the Board or its designee. Should the designated work site monitor suspect at any time during

1 the probationary period that Respondent has abused alcohol or drugs, he or she shall notify the
2 Board immediately.

3 In the event of suspected abuse, the monitor shall make at least oral notification within one
4 (1) business day of the occurrence, and shall be followed by written notification within two (2)
5 business days of the occurrence. If, for any reason, including change of employment, Respondent
6 is no longer able to be monitored by the approved work site monitor, within ten (10) days
7 Respondent shall designate a new work site monitor for approval by the Board or its designee.
8 Failure to timely identify an acceptable initial or replacement work site monitor, or to ensure
9 monthly reports are submitted to the Board by the monitor, shall be considered a violation of
10 probation.

11 Within thirty (30) days of being approved by the Board or its designee, the work site
12 monitor shall sign an affirmation that he or she has reviewed the terms and conditions of
13 Respondent's disciplinary order and agrees to monitor Respondent. The work site monitor shall
14 at least:

- 15 1) Have regular face-to-face contact with Respondent in the work environment, at least
16 once per week or with greater frequency if required by the Board or its designee;
- 17 2) Interview other staff in the office regarding Respondent's behavior, if applicable; and
- 18 3) Review Respondent's work attendance.

19 The written reports submitted to the Board or its designee by the work site monitor shall
20 include at least the following information: Respondent's name and license number; the monitor's
21 name, license number (if applicable) and work site location; the date(s) the monitor had face-to-
22 face contact with Respondent; the staff interviewed, if applicable; an attendance report; notes on
23 any changes in Respondent's behavior or personal habits; notes on any indicators that may lead to
24 substance abuse; and the work site monitor's signature.

25 Respondent shall complete the required consent forms and sign an agreement with the work
26 site monitor and the Board to allow the Board to communicate with the work site monitor.

27 It is a condition of Respondent's enrollment in the Pharmacists Recovery Program (PRP)
28 that she is required to have a work site monitor approved by the PRP who shall be responsible for

1 supervising Respondent during working hours. Respondent shall be responsible for ensuring that
2 the work site monitor reports in writing to the PRP monthly or on another schedule as directed by
3 the PRP. Should the designated work site monitor suspect at any time during the probationary
4 period that Respondent has abused alcohol or drugs, he or she shall notify the PRP immediately.
5 The initial notification shall be made orally within one (1) business day of the occurrence, which
6 shall be followed by written notification within two (2) business days of the occurrence. If, for
7 any reason, including change of employment, Respondent is not longer able to be monitored by
8 the approved work site monitor, within ten (10) days of commencing new employment for prior
9 approval by the PRP. Failure to identify an acceptable initial or replacement work site monitor, or
10 to ensure monthly reports are submitted to the PRP by the work site monitor, shall be considered
11 a violation of probation.

12 Within thirty (30) days of being approved by the PRP, the work site monitor shall sign an
13 affirmation that he or she has reviewed the terms and conditions of Respondent's disciplinary
14 order and agrees to monitor Respondent. The work site monitor shall at least:

- 15 1) Have regular face-to-face contact with Respondent in the work environment, at least
16 once per week or with greater frequency if required by the Board or its designee;
- 17 2) Interview other staff in the office regarding Respondent's behavior, if applicable; and
- 18 3) Review Respondent's work attendance.

19 The written reports submitted to the PRP by the work site monitor shall include at least the
20 following information: Respondent's name and license number; the monitor's name, license
21 number (if applicable) and work site location; the date(s) the monitor had face-to-face contact
22 with Respondent; the staff interviewed, if applicable; an attendance report; notes on any changes
23 in Respondent's behavior or personal habits; notes on any indicators that may lead to substance
24 abuse; and the work site monitor's signature.

25 Respondent shall complete the required consent forms and sign an agreement with the work
26 site monitor and the Board to allow the Board to communicate with the work site monitor.

25. Supervised Practice

Within thirty (30) days of the effective date of this decision, Respondent shall submit to the Board or its designee, for prior approval, the name of a Registered Pharmacist by and not on probation with the Board, to serve as Respondent's practice supervisor. As part of the documentation submitted, Respondent shall cause the proposed practice supervisor to report to the Board in writing acknowledging that he or she has read the decision in case number 7348, and is familiar with the terms and conditions imposed thereby, including the level of supervision required by the Board or its designee. This level will be determined by the Board or its designee, will be communicated to the Respondent on or before the effective date of this decision and shall be one of the following:

Continuous – At least 75% of a work week

Substantial - At least 50% of a work week

Partial - At least 25% of a work week

Daily Review - Supervisor's review of probationer's daily activities within 24 hours

Respondent may practice only under the required level of supervision by an approved practice supervisor. If, for any reason, including change of employment, Respondent is no longer supervised at the required level by an approved practice supervisor, within ten (10) days of this change in supervision Respondent shall submit to the Board or its designee, for prior approval, the name of a Registered Pharmacist by and not on probation with the Board, to serve as Respondent's replacement practice supervisor. As part of the documentation submitted, Respondent shall cause the proposed replacement practice supervisor to report to the Board in writing acknowledging that he or she has read the decision in case number 7348, and is familiar with the terms and conditions imposed thereby, including the level of supervision required.

Any of the following shall result in the automatic suspension of practice by a Respondent and shall be considered a violation of probation:

Failure to nominate an initial practice supervisor, and to have that practice supervisor report to the Board in writing acknowledging the decision, terms and conditions, and supervision level, within thirty (30) days;

1 Failure to nominate a replacement practice supervisor, and to have that practice supervisor
2 report to the Board in writing acknowledging the decision, terms and conditions, and supervision
3 level, within ten (10) days;

4 Practicing in the absence of an approved practice supervisor beyond the initial or
5 replacement nomination period; or

6 Any failure to adhere to the required level of supervision.

7 Respondent shall not resume practice until notified in writing by the Board or its designee.

8 During any suspension, Respondent shall not enter any pharmacy area or any portion of the
9 licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug
10 retailer or any other distributor of drugs which is licensed by the Board, or any manufacturer, or
11 any area where dangerous drugs and/or dangerous devices or controlled substances are
12 maintained. Respondent shall not practice pharmacy nor do any act involving drug selection,
13 selection of stock, manufacturing, compounding, dispensing or patient consultation; nor shall
14 Respondent manage, administer, or be a consultant to any licensee of the Board, or have access to
15 or control the ordering, distributing, manufacturing or dispensing of dangerous drugs and/or
16 dangerous devices or controlled substances.

17 During any suspension, Respondent shall not engage in any activity that requires the
18 professional judgment and/or licensure as a Registered Pharmacist. Respondent shall not direct
19 or control any aspect of the practice of pharmacy or of the manufacture, distribution, wholesaling,
20 or retailing of dangerous drugs and/or dangerous devices or controlled substances.

21 Failure to comply with any suspension shall be considered a violation of probation.

22 Any of the following shall be considered a violation of probation: failure to timely
23 nominate either an initial or a replacement practice supervisor; failure to cause the practice
24 supervisor to timely report to the Board in writing acknowledging the decision, terms and
25 conditions, and supervision level; practicing in the absence of an approved practice supervisor
26 after lapse of the nomination period; and/or failure to adhere to the level of supervision required
27 by the Board or its designee. If any of these obligations or prohibitions is not met, Respondent
28

1 shall be prohibited from practice as a Registered Pharmacist and may not resume such practice
2 until notified by the Board or its designee in writing.

3 **26. No Ownership or Management of Licensed Premises**

4 Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager,
5 administrator, member, officer, director, trustee, associate, or partner of any business, firm,
6 partnership, or corporation currently or hereinafter licensed by the Board. Respondent shall sell
7 or transfer any legal or beneficial interest in any entity licensed by the Board within ninety (90)
8 days following the effective date of this decision and shall immediately thereafter provide written
9 proof thereof to the Board. Failure to timely divest any legal or beneficial interest(s) or provide
10 documentation thereof shall be considered a violation of probation.

11 **ACCEPTANCE**

12 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
13 stipulation and the effect it will have on my Pharmacist License. I enter into this Stipulated
14 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
15 bound by the Decision and Order of the Board of Pharmacy.

16
17 DATED: _____

18 CHRISTY LYNN ALEXANDER-PEREZ
19 *Respondent*
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1 shall be prohibited from practice as a Registered Pharmacist and may not resume such practice
2 until notified by the Board or its designee in writing.

3 **26. No Ownership or Management of Licensed Premises**

4 Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager,
5 administrator, member, officer, director, trustee, associate, or partner of any business, firm,
6 partnership, or corporation currently or hereinafter licensed by the Board. Respondent shall sell
7 or transfer any legal or beneficial interest in any entity licensed by the Board within ninety (90)
8 days following the effective date of this decision and shall immediately thereafter provide written
9 proof thereof to the Board. Failure to timely divest any legal or beneficial interest(s) or provide
10 documentation thereof shall be considered a violation of probation.

11 **ACCEPTANCE**

12 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
13 stipulation and the effect it will have on my Pharmacist License. I enter into this Stipulated
14 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
15 bound by the Decision and Order of the Board of Pharmacy.

16
17 DATED:

10-12-22



CHRISTY LYNN ALEXANDER-PEREZ
Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Pharmacy.

DATED: _____

Respectfully submitted,

ROB BONTA
Attorney General of California
DAVID E. BRICE
Supervising Deputy Attorney General

PATRICIA WEBBER HEIM
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 7348

1 ROB BONTA
Attorney General of California
2 DAVID E. BRICE
Supervising Deputy Attorney General
3 PATRICIA WEBBER HEIM
Deputy Attorney General
4 State Bar No. 230889
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 210-7519
Facsimile: (916) 327-8643
7 E-mail: Patricia.Heim@doj.ca.gov
Attorneys for Complainant
8

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

13 In the Matter of the Accusation Against:

Case No. 7348

14 **CHRISTY LYNN ALEXANDER-PEREZ**
15 **974 Park Terrance Drive**
Galt, CA 95632

ACCUSATION

16 **Pharmacist License No. RPH 53901**

17 Respondent.
18

19 **PARTIES**

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

22 2. On or about September 5, 2002, the Board issued Pharmacist License Number RPH
23 53901 to Christy Lynn Alexander-Perez (Respondent). The Pharmacist License was in full force
24 and effect at all times relevant to the charges brought herein and will expire on June 30, 2024,
25 unless 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 (Code) unless otherwise indicated.

4. Business and Professions Code section 4300 states, in pertinent part:

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

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

(1) Suspending judgment.

(2) Placing him or her upon probation.

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

(4) Revoking his or her license.

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

5. Code section 4300.1 states, in pertinent part:

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.

STATUTORY PROVISIONS

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

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

....

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

....

1 daughter's graduation, had been unsure where she was going, and had been weaving back and
2 forth, going faster than she should have been. Respondent denied drinking alcohol, but admitted
3 that she had taken Prozac and Busipirone earlier in the morning. Respondent showed signs of
4 intoxication, and was unable to satisfactorily complete a series of field sobriety tests. Respondent
5 agreed to preliminary alcohol screening, the results of which were .219 percent and .202 percent
6 blood alcohol content (BAC). She later agreed to submit to a portable evidential breath-alcohol
7 test, the results of which showed a BAC of 0.23 and 0.21 percent. Respondent was arrested for a
8 violation of Vehicle Code section 23152, subdivisions (a), (driving under the influence), and (b)
9 (driving with a BAC of 0.08 percent or higher).

10 12. On or about June 16, 2022, a California Highway Patrol Officer (Officer) received a
11 dispatch regarding a reckless vehicle driving northbound on Interstate 5 (I-5), north of County
12 Road 102 near Woodland, California. The vehicle was traveling in excess of 100 miles per hour
13 and using all lanes of traffic. The vehicle was later reported to be located stopped at an address
14 on County Road 99, with two vehicles preventing it from leaving until law enforcement arrived.
15 The officer identified the driver of the vehicle as Respondent, who showed signs of intoxication.
16 Respondent told the officer she believed she was in Elk Grove, and admitted she had consumed
17 alcohol. Respondent failed a series of Field Sobriety tests, and her preliminary alcohol screening
18 results were 0.239 and 0.223 percent. Respondent was arrested for a violation of Vehicle Code
19 section 23152, subdivisions (a) (driving under the influence), and (b) (driving with a BAC of 0.08
20 percent or higher). Following her arrest, Respondent agreed to perform a breath test, the results
21 of which were 0.21 and 0.21 percent. While at the jail, Respondent told officers that her license
22 had been suspended on May 14, 2022, for a prior DUI arrest.

23 13. Following the two arrests, Board Inspector Flores interviewed Respondent, who
24 admitted to and confirmed her two DUI arrests. She also admitted to a third incident that had
25 occurred on June 28, 2022. She said she had consumed one pint of vodka, drove off the road, and
26 hit a fence. Respondent also stated that she was still struggling with addiction and had been
27 participating in an out-patient treatment program since August 2021. Her employer placed her on
28 a leave of absence as of July 11, 2022.

1 **CAUSE FOR DISCIPLINE**

2 **(Use of Alcohol in a Dangerous Manner)**

3 14. Respondent is subject to disciplinary action under Code section 4301, subdivision (h),
4 on the grounds of unprofessional conduct, in that on multiple occasions, Respondent used
5 dangerous drugs and alcoholic beverages to an extent or in a manner as to be dangerous or
6 injurious to oneself, to any other person or to the public, as more particularly set forth above in
7 paragraphs 11, 12, and 13, and incorporated herein by reference.

8 **DISCIPLINE CONSIDERATIONS**

9 15. To determine the degree of discipline, if any, to be imposed on Respondent,
10 Complainant alleges that effective February 26, 2009, Respondent's Original Pharmacist License
11 Number RPH 53901 was revoked, with revocation immediately stayed, subject to probation for
12 five years with terms and conditions that included, but was not limited to, participation in the
13 Pharmacists Recovery Program (RPP), random drug screening, abstention from drugs and alcohol
14 use, a community services program, and supervised practice. The basis for the previous
15 discipline was that between December 2006, and February 2007, while on duty as a pharmacist,
16 Respondent stole for personal use over 800 pills that were dangerous drugs pursuant to Code
17 section 4022, or Schedule II, III, and IV drugs, pursuant to Health and Safety Code section 11057,
18 subdivision (d), unlawfully self-administered those controlled substances and/or dangerous drugs
19 for which she did not have a prescription, and worked as a pharmacist while under the influence
20 of those drugs.

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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 Pharmacist License Number RPH 53901, issued to Christy Lynn Alexander-Perez;
2. Ordering Christy Lynn Alexander-Perez 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: 9/9/2022

Signature on File

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

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