

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

**In the Matter of the Accusation Against:**

**LESLIE REYES, Respondent**

**Pharmacy Technician Registration No. TCH 181466**

**Agency Case No. 7378**

**DECISION AND ORDER**

The attached Stipulated Surrender of License 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 February 12, 2025.

It is so ORDERED on January 13, 2025.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

By



Seung W. Oh, Pharm.D.  
Board President

1 ROB BONTA  
Attorney General of California  
2 MARICHELLE S. TAHIMIC  
Supervising Deputy Attorney General  
3 LAURO A. PAREDES  
Deputy Attorney General  
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*Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

Case No. 7378

13 **LESLIE REYES**  
14 **1006 Del Dios Road, #18**  
**Escondido, CA 92029**  
15 **Pharmacy Technician Registration No. TCH**  
16 **181466**

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

17 Respondent.

18  
19 In the interest of a prompt and speedy settlement of this matter, consistent with the public  
20 interest and the responsibility of the Board of Pharmacy of the Department of Consumer Affairs,  
21 the parties hereby agree to the following Stipulated Surrender and Disciplinary Order which will  
22 be submitted to the Board for approval and adoption as the final disposition of the Accusation.

23 **PARTIES**

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



1 **CULPABILITY**

2 8. Respondent admits the truth of each and every charge and allegation in Accusation  
3 No. 7378, agrees that cause exists for discipline and hereby surrenders her Pharmacy Technician  
4 Registration No. TCH 181466 for the Board's formal acceptance.

5 9. Respondent understands that by signing this stipulation she enables the Board to issue  
6 an order accepting the surrender of her Pharmacy Technician Registration without further  
7 process.

8 **CONTINGENCY**

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

18 11. The parties understand and agree that Portable Document Format (PDF) and facsimile  
19 copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures  
20 thereto, shall have the same force and effect as the originals.

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

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

1 **ORDER**

2 IT IS HEREBY ORDERED that Pharmacy Technician Registration No. TCH 181466,  
3 issued to Respondent Leslie Reyes, is surrendered and accepted by the Board.

4 1. The surrender of Respondent's Pharmacy Technician Registration and the acceptance  
5 of the surrendered license by the Board shall constitute the imposition of discipline against  
6 Respondent. This stipulation constitutes a record of the discipline and shall become a part of  
7 Respondent's license history with the Board.

8 2. Respondent shall lose all rights and privileges as a pharmacy technician in California  
9 as of the effective date of the Board's Decision and Order.

10 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was  
11 issued, her wall certificate on or before the effective date of the Decision and Order.

12 4. If she ever applies for licensure or petitions for reinstatement in the State of  
13 California, the Board shall treat it as a new application for licensure. Respondent must comply  
14 with all the laws, regulations and procedures for licensure in effect at the time the application or  
15 petition is filed, and all of the charges and allegations contained in Accusation No. 7378 shall be  
16 deemed to be true, correct and admitted by Respondent when the Board determines whether to  
17 grant or deny the application or petition.

18 5. Respondent shall pay the agency its costs of investigation and enforcement in the  
19 amount of \$2,518.75 prior to issuance of a new or reinstated license.

20 6. If Respondent should ever apply or reapply for a new license or certification, or  
21 petition for reinstatement of a license, by any other health care licensing agency in the State of  
22 California, all of the charges and allegations contained in Accusation, No. 7378 shall be deemed  
23 to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any  
24 other proceeding seeking to deny or restrict licensure.

25 **ACCEPTANCE**

26 I have carefully read the Stipulated Surrender of License and Order. I understand the  
27 stipulation and the effect it will have on my Pharmacy Technician Registration. I enter into this

28 ///

1 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to  
2 be bound by the Decision and Order of the Board of Pharmacy.

3  
4 DATED: \_\_\_\_\_  
5 LESLIE REYES  
6 Respondent

7 **ENDORSEMENT**

8 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
9 for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

10 DATED: \_\_\_\_\_ Respectfully submitted,  
11 ROB BONTA  
12 Attorney General of California  
13 MARICHELLE S. TAHIMIC  
14 Supervising Deputy Attorney General

15 LAURO A. PAREDES  
16 Deputy Attorney General  
17 Attorneys for Complainant

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19 Stipulated Surrender of License and Order.docx

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1 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to  
2 be bound by the Decision and Order of the Board of Pharmacy.

3  
4 DATED: \_\_\_\_\_  
5 LESLIE REYES  
6 Respondent

7 **ENDORSEMENT**

8 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
9 for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

10 DATED: December 5, 2024

Respectfully submitted,

11 ROB BONTA  
12 Attorney General of California  
13 MARICHELLE S. TAHIMIC  
14 Supervising Deputy Attorney General



15 LAURO A. PAREDES  
16 Deputy Attorney General  
17 Attorneys for Complainant

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19 Stipulated Surrender of License and Order.docx

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**Exhibit A**

**Accusation No. 7378**

1 ROB BONTA  
Attorney General of California  
2 MARICHELLE S. TAHIMIC  
Supervising Deputy Attorney General  
3 LAURO A. PAREDES  
Deputy Attorney General  
4 State Bar No. 254663  
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10 **BOARD OF PHARMACY**  
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12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. 7378

14 **LESLIE REYES**  
15 **1006 Del Dios Road, #18**  
**Escondido, CA 92029**

**ACCUSATION**

16 **Pharmacy Technician Registration No. TCH**  
17 **181466**

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 May 4, 2021, the Board issued Pharmacy Technician Registration  
23 Number TCH 181466 to Leslie Reyes (Respondent). The Pharmacy Technician Registration was  
24 in full force and effect at all times relevant to the charges brought herein and will expire on July  
25 31, 2024, unless renewed.

26 ///

27 ///

28 ///

1 **JURISDICTION**

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

5 4. Code section 4011 provides that the Board shall administer and enforce both the  
6 Pharmacy Law [Bus. & Prof. Code, § 4000 et seq.] and the Uniform Controlled Substance Act  
7 [Health & Safety Code, § 11000 et seq.].

8 5. Code section 4300, subdivision (a), states, “Every license issued may be suspended or  
9 revoked.”

10 6. Code section 4300.1 states:

11 The expiration, cancellation, forfeiture, or suspension of a board-issued license  
12 by operation of law or by order or decision of the board or a court of law, the placement  
13 of a license on a retired status, or the voluntary surrender of a license by a licensee shall  
14 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.

15 **STATUTORY PROVISIONS**

16 7. Code section 4301 states:

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

19 ...

20 (h) The administering to oneself, of any controlled substance, or the use of any  
21 dangerous drug or of alcoholic beverages to the extent or in a manner as to be dangerous  
22 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.

23 ...

24 **REGULATORY PROVISIONS**

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

26 (a) For the purpose of denial, suspension, or revocation of a personal or facility  
27 license pursuant to Section 141 or Division 1.5 (commencing with Section 475) of the  
28 Business and Professions Code, a crime, professional misconduct, or act shall be  
considered substantially related to the qualifications, functions or duties of the  
practice, profession, or occupation that may be performed under the license type

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

4 ...

#### 5 **COST RECOVERY**

6 9. Code section 125.3 provides, in pertinent part, that the Board may request the  
7 administrative law judge to direct a licentiate found to have committed a violation or violations of  
8 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
9 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being  
10 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
11 included in a stipulated settlement.

#### 12 **BACKGROUND**

13 10. On or about October 17, 2021, Escondido Police responded to a disturbance at a  
14 Halloween party. Police contacted witness MJ. MJ stated that Respondent was intoxicated at a  
15 party and arguing with multiple party guests. MJ escorted Respondent out of the party to de-  
16 escalate the situation. After stepping out of the party Respondent got into her vehicle, which was  
17 parked behind MJ's car, and drove it into MJ's car. Respondent then backed her vehicle up  
18 approximately 10 feet and again shifted her car into drive and slammed into MJ's vehicle with  
19 such force that MJ's vehicle was pushed into the garage causing damage to both MJ's vehicle and  
20 the garage. Respondent fled the scene. Police officers found Respondent seated in her parked  
21 vehicle not far from MJ's residence. The officers noted that Respondent appeared heavily  
22 intoxicated. She had an odor of an alcoholic beverage; her speech was slurred; her gait was  
23 unsteady; and her eyes were red, bloodshot and watery. Escondido Police arrested Respondent  
24 for vandalism.

25 11. As a result of her arrest for vandalism, Respondent was charged with violation of  
26 Penal Code section 594 subsection (a)(b)(1), vandalism in San Diego County Superior Court. As  
27 part of an agreement with the District Attorney's office, Respondent agreed to pay restitution and  
28 the charges against her were dropped.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct –Dangerous Use of Alcohol)**

3 12. Respondent is subject to disciplinary action under Code section 4301, subdivision (h),  
4 in that after consuming alcohol, Respondent rammed her vehicle into another person’s vehicle  
5 with such force that the victim’s vehicle collided with a garage, as set forth in paragraphs 10 and  
6 11 above.

7 **SECOND CAUSE FOR DISCIPLINE**

8 **(General Unprofessional Conduct)**

9 13. Respondent is subject to disciplinary action under Code section 4301 for  
10 unprofessional conduct, as set forth in paragraphs 10 and 11 above.

11 **PRAYER**

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

- 14 1. Revoking or suspending Pharmacy Technician Registration Number TCH 181466,  
15 issued to Leslie Reyes;
- 16 2. Ordering Leslie Reyes to pay the Board of Pharmacy the reasonable costs of the  
17 investigation and enforcement of this case, pursuant to Business and Professions Code section  
18 125.3; and,
- 19 3. Taking such other and further action as deemed necessary and proper.

20  
21  
22 DATED: September 25, 2023

23 **Sodergren,**  
24 **Anne@DCA**

Digitally signed by Sodergren,  
Anne@DCA  
Date: 2023.09.25 15:03:10  
-07'00'

25 ANNE SODERGREN  
26 Executive Officer  
27 Board of Pharmacy  
28 Department of Consumer Affairs  
State of California  
*Complainant*