

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

In the Matter of the Accusation Against:

ARIADNA VILLALOBOS

Pharmacy Technician Registration No. TCH 73046

Agency Case No. 7593

OAH No. 2024010691

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 August 7, 2024.

It is so ORDERED on July 8, 2024.

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 NANCY A. KAISER
Supervising Deputy Attorney General
3 LANGSTON M. EDWARDS
Deputy Attorney General
4 State Bar No. 237926
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6371
6 Facsimile: (916) 731-2126
Attorneys for Complainant
7

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

12 In the Matter of the Accusation Against:

13 **ARIADNA VILLALOBOS**
14 **673 S. Keenan Ave**
15 **Los Angeles, CA 90022**

16 **Pharmacy Technician Registration No. TCH**
17 **73046**

18 Respondent.

19 Case No. 7593

20 OAH No. 2024010691

21 **STIPULATED SURRENDER OF**
22 **LICENSE AND ORDER**

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

25 **PARTIES**

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

2. Ariadna Villalobos (Respondent) is represented in this proceeding by attorney Negin
Yamini, Esq., whose address is: 5757 Wilshire Blvd. #340, Los Angeles, CA 90036-3686.

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ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney Negin Yamini, Esq. I understand the stipulation and the effect it will have on my Pharmacy Technician Registration. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: _____
ARIADNA VILLALOBOS
Respondent

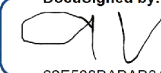
I have read and fully discussed with Respondent Ariadna Villalobos the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: _____
NEGIN YAMINI, ESQ.
Attorney for Respondent

ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney Negin Yamini, Esq. I understand the stipulation and the effect it will have on my Pharmacy Technician Registration. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: 5/31/2024

DocuSigned by:

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ARIADNA VILLALOBOS
Respondent

I have read and fully discussed with Respondent Ariadna Villalobos the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: 5/29/2024

DocuSigned by:



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NEGIN YAMINI, ESQ.
Attorney for Respondent

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ENDORSEMENT

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

DATED: _____

Respectfully submitted,
ROB BONTA
Attorney General of California
NANCY A. KAISER
Supervising Deputy Attorney General

LANGSTON M. EDWARDS
Deputy Attorney General
Attorneys for Complainant

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ENDORSEMENT

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

DATED: ___ June 7, 2024 _____

Respectfully submitted,

ROB BONTA
Attorney General of California
NANCY A. KAISER
Supervising Deputy Attorney General

Langston M. Edwards

LANGSTON M. EDWARDS
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 7593

1 ROB BONTA
Attorney General of California
2 NANCY A. KAISER
Supervising Deputy Attorney General
3 LANGSTON M. EDWARDS
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11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 7593

13 **ARIADNA VILLALOBOS**
14 **673 S. Keenan Ave**
Los Angeles, CA 90022

ACCUSATION

15 **Pharmacy Technician Registration No. TCH**
16 **73046**

17 Respondent.

18
19
20 **PARTIES**

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

23 2. On or about November 9, 2006, the Board of Pharmacy issued Pharmacy Technician
24 Registration Number TCH 73046 to Ariadna Villalobos (Respondent). The Pharmacy Technician
25 Registration was in full force and effect at all times relevant to the charges brought herein and
26 will expire on October 31, 2024, unless renewed.

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JURISDICTION

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

4. Section 118, subdivision (b), of the Code provides that the suspension/expiration/surrender/cancellation of a license shall not deprive the Board/Registrar/Director of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

5. Section 4300 of the Code states:

(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.

6. Section 4300.1 of the Code states:

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

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1 **STATUTORY PROVISIONS**

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

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

5 (a) Procurement of a license by fraud or misrepresentation.

6 8. Penal Code section 115 subdivision (a) states:

7 Every person who knowingly procures or offers any false or forged instrument
8 to be filed, registered, or recorded in any public office within this state, which
instrument, if genuine, might be filed, registered, or recorded under any law of this
9 state or of the United States, is guilty of a felony.

10 **COST RECOVERY**

11 9. Section 125.3 provides that the Board may request the administrative law judge to
12 direct a licentiate found to have committed a violation or violations of the licensing act to pay a
13 sum not to exceed the reasonable costs of the investigation and enforcement of the case.
14

15 **FACTUAL ALLEGATIONS**

16 10. On April 28, 2023, the Board requested that the Division of Investigation (DOI)
17 obtain information from the Department of Homeland Security or the United States Social
18 Security Administration (SSA) or an equivalent government agency regarding concerns that
19 Respondent fraudulently obtained Pharmacy Technician Registration Number TCH 73046 using
20 an invalid social security registration.
21

22 11. On May 5, 2023, the Board requested verification from SSA regarding social security
23 registration number “***-**-3455” which Respondent represented as her own when obtaining a
24 pharmacy technician registration.

25 12. On May 16, 2023, SSA reported that the social security registration was “NOT A
26 MATCH” for Respondent.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 (Procurement of License By Fraud)

3 13. Respondent is subject to disciplinary action under Code section 4301, subdivision (a)
4 in conjunction with Penal Code section 115, subdivision (a) in that she engaged in unprofessional
5 conduct by procuring or obtaining a pharmacy technician license by fraud or misrepresentation.
6 Complainant incorporates paragraphs 10 – 12, above, by reference.

7
8 **PRAYER**

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

11 1. Revoking or suspending Pharmacy Technician Registration Number TCH 73046,
12 issued to Ariadna Villalobos;

13 2. Ordering Ariadna Villalobos to pay the Board of Pharmacy the reasonable costs of
14 the investigation and enforcement of this case, pursuant to Business and Professions Code section
15 125.3; and,

16 3. Taking such other and further action as deemed necessary and proper.
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19 DATED: 12/4/2023

Sodergren,
Anne@DCA Digitally signed by
Sodergren, Anne@DCA
Date: 2023.12.04 13:38:14
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ANNE SODERGREN
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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