

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

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

**RAYANNE HELEN HEIMFORTH,  
Pharmacy Technician License No. TCH 172212,**

**Respondent.**

**Agency Case No. 7852**

**DECISION AND ORDER**

The attached Stipulated Surrender of License and 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 June 4, 2025.

It is so ORDERED on May 5, 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 THOMAS L. RINALDI  
Supervising Deputy Attorney General  
3 LESLIE A. WALDEN  
Deputy Attorney General  
4 State Bar No. 196882  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6293  
6 Facsimile: (916) 731-2126  
E-mail: Leslie.Walden@doj.ca.gov  
7 *Attorneys for Complainant*

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 **RAYANNE HELEN HEIMFORTH**  
14 **1419 W. 222nd St**  
**Torrance, CA 90501**

15 **Pharmacy Technician License No. TCH**  
**172212**

16 Respondent.

Case No. 7852

OAH No.

**STIPULATED SURRENDER OF**  
**LICENSE AND ORDER**

17  
18  
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
20 entitled proceedings that the following matters are true:

21 **PARTIES**

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

26 2. Rayanne Helen Heimforth (Respondent) is represented in this proceeding by attorney  
27 Suzanne M. Crouts, Esq., whose address is: 2447 Pacific Coast Hwy, 2nd Floor, Hermosa Beach,  
28 CA 90254.





1 to the Board within ten (10) days of the effective date of this decision. The surrender of  
2 Respondent's license and the acceptance of the surrendered license by the Board shall constitute  
3 the imposition of discipline against Respondent. This decision constitutes a record of discipline  
4 and shall become a part of respondent's license history with the Board. Respondent understands  
5 and agrees that for the purposes of Business and Professions Code section 4307, this surrender  
6 shall be treated as if the license had been revoked.

7 2. Respondent may only seek a new or reinstated license from the Board by way of a  
8 petition for reinstatement. Respondent shall petition for reinstatement of a revoked license.

9 3. Respondent may not petition for any license, permit, or registration from the Board  
10 for three (3) years from the effective date of this decision. Respondent stipulates that should they  
11 apply for any license from the Board on or after the effective date of this decision, all allegations  
12 set forth in the Accusation shall be deemed to be true, correct and admitted by Respondent when  
13 the Board determines whether to grant or deny the petition.

14 4. Respondent is required to report this surrender as disciplinary action.

15 5. Respondent shall pay the agency its costs of investigation and enforcement in the  
16 amount of \$16,578.00 prior to petitioning the Board. No such petition shall be considered until  
17 full payment is made.

18 **ACCEPTANCE**

19 I have carefully read the above Stipulated Surrender of License and Order and have fully  
20 discussed it with my attorney Suzanne M. Crouts, Esq.. I understand the stipulation and the effect  
21 it will have on my Pharmacy Technician License. I enter into this Stipulated Surrender of  
22 License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
23 Decision and Order of the Board of Pharmacy.

24  
25 DATED: \_\_\_\_\_

26 RAYANNE HELEN HEIMFORTH  
27 *Respondent*



1 I have read and fully discussed with Respondent Rayanne Helen Heimforth the terms and  
2 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
3 approve its form and content.

4  
5 DATED: \_\_\_\_\_ SUZANNE M. CROUTS, ESQ.  
6 *Attorney for Respondent*

7  
8  
9 **ENDORSEMENT**

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

12  
13 DATED: \_\_\_\_\_ Respectfully submitted,  
14 ROB BONTA  
15 Attorney General of California  
16 THOMAS L. RINALDI  
17 Supervising Deputy Attorney General

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
LESLIE A. WALDEN  
Deputy Attorney General  
*Attorneys for Complainant*

LA2024604868  
67332516.docx



**Exhibit A**

**Accusation No. 7852**

1 ROB BONTA  
Attorney General of California  
2 THOMAS L. RINALDI  
Supervising Deputy Attorney General  
3 LESLIE A. WALDEN  
Deputy Attorney General  
4 State Bar No. 196882  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6293  
6 Facsimile: (916) 731-2126  
E-mail: Leslie.Walden@doj.ca.gov  
7 *Attorneys for Complainant*

8 **BEFORE THE**  
9 **BOARD OF PHARMACY**

10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Interim Suspension Order  
Against:

13 **RAYANNE HELEN HEIMFORTH**  
14 **1419 W. 222nd St**  
**Torrance, CA 90501**

15 **Pharmacy Technician License No. TCH**  
16 **172212**

17 Respondent.

Case No. 7852

OAH No. 2024060943

**ACCUSATION**

18  
19 **PARTIES**

20  
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 April 25, 2019, Board of Pharmacy issued Pharmacy Technician License  
24 Number TCH 172212 to Rayanne Helen Heimforth (Respondent). The Pharmacy Technician  
25 License was in full force and effect at all times relevant to the charges brought herein and will  
26 expire on April 30, 2025, unless renewed. On or about August 2, 2024, Respondent's license was  
27 suspended pursuant to a Stipulation for Interim Suspension Order.  
28

1 **JURISDICTION**

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

5 4. Section 4300.1 of the Code states:

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

11 **STATUTORY PROVISIONS**

12 5. Section 4301 of the Code states:

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

16 ...

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

20 6. Section 4060 of the Code states:

21 No person shall possess any controlled substance, except that furnished to a person upon  
22 the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor  
23 pursuant to Section 3640.7, or furnished pursuant to a drug order issued by a certified  
24 nurse-midwife pursuant to Section 2746.51, a nurse practitioner pursuant to Section 2836.1, or a  
25 physician assistant pursuant to Section 3502.1, or naturopathic doctor pursuant to Section 3640.5,  
26 or a pharmacist pursuant to either subparagraph (D) of paragraph (4) of, or clause (iv) of  
27 subparagraph (A) of paragraph (5) of, subdivision (a) of Section 4052. This section shall not  
28 apply to the possession of any controlled substance by a manufacturer, wholesaler, pharmacy,

1 pharmacist, physician, podiatrist, dentist, optometrist, veterinarian, naturopathic doctor, certified  
2 nurse-midwife, nurse practitioner, or physician assistant, when in stock in containers correctly  
3 labeled with the name and address of the supplier or producer.

4 Nothing in this section authorizes a certified nurse-midwife, a nurse practitioner, a  
5 physician assistant, or a naturopathic doctor, to order his or her own stock of dangerous drugs and  
6 devices.

7 7. Section 11173 of the Health and Safety Code states:

8 (a) No person shall obtain or attempt to obtain controlled substances, or procure or attempt  
9 to procure the administration of or prescription for controlled substances, (1) by fraud, deceit,  
10 misrepresentation, or subterfuge; or (2) by the concealment of a material fact.

11 ....

#### 12 **COST RECOVERY**

13 8. Section 125.3 of the Code states, in pertinent part, that the Board may request the  
14 administrative law judge to direct a licentiate found to have committed a violation or violations of  
15 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
16 enforcement of the case.

#### 17 **DEFINITIONS**

18 9. Acetaminophen/codeine 300 mg/60 mg, generic for Tylenol with Codeine #4, is a  
19 Schedule III Controlled Substance pursuant to Health and Safety Code section 11056, subdivision  
20 (e)(2) and is a Dangerous Drug pursuant to Code section 4022. It is used to treat pain.

21 10. Alprazolam, generic for Xanax, is a Schedule IV Controlled Substance pursuant to  
22 Health and Safety Code section 11057, subdivision (d)(1) and is a Dangerous Drug pursuant to  
23 Code section 4022. It is used to treat anxiety.

#### 24 **FACTUAL ALLEGATIONS**

25 11. On or about April 5, 2024, the Board received a notification of termination of the  
26 Respondent from CVS Pharmacy #1176 located at 25829 Narbonne Avenue, Lomita CA 90717  
27 (CVS) alleging that Respondent diverted controlled substances from CVS. Along with this  
28 notification, the Board received DEA Form 106, Report of Theft or Loss of Controlled

1 Substances documenting Respondent's theft of 932 tablets of controlled substances as follows:

	<b>Controlled Substance</b>	<b>Total Quantity Stolen</b>
2		
3	i. ALPRAZOLAM 1 MG TABLET	306
4	ii. ALPRAZOLAM 2 MG TABLET	479
5	iii. ACETAMINOPHEN WITH CODEINE 300/60 MG	147

6 12. In the DEA Form 106, Respondent admitted to stealing approximately eight hundred  
7 (800) tablets of controlled substances for her own personal use or sale while employed as a  
8 pharmacy technician at CVS. While the DEA Form 106 states that Respondent admitted to  
9 stealing eight hundred (800) tablets of controlled substances, the pharmacy attributed all further  
10 uncovered losses to Respondent in light of her admissions.

11 **FIRST CAUSE FOR DISCIPLINE**

12 (Unprofessional Conduct – Dishonesty, Fraud or Deceit)

13 13. Respondent is subject to disciplinary action under Code section 4301 subdivision (f)  
14 in that Respondent engaged in unprofessional conduct when she diverted controlled substances  
15 through acts of dishonesty, fraud, or deceit. The circumstances surrounded this violation are set  
16 forth above in paragraphs 11 and 12, and are incorporated herein as though set forth in full.

17 **SECOND CAUSE FOR DISCIPLINE**

18 (Unprofessional Conduct -Possession of Controlled Substances Without Prescription)

19 14. Respondent is subject to disciplinary action under Code section 4060 as it relates to  
20 section 4301 in that Respondent engaged in unprofessional conduct when she possessed  
21 controlled substances without a valid prescription. The circumstances surrounded this violation  
22 are set forth above in paragraphs 11 and 12, and are incorporated herein as thought set forth in  
23 full.

24 **THIRD CAUSE FOR DISCIPLINE**

25 (Unprofessional Conduct - Possession of Controlled Substance by Fraud or Deceit)

26 15. Respondent is subject to disciplinary action under Health and Safety Code section  
27 11173 in that she obtained controlled substances without a prescription by fraud, deceit or  
28

1 misrepresentation. The circumstances surrounded this violation are set forth above in paragraphs  
2 11 and 12, and are incorporated herein as thought set forth in full.

3 **OTHER MATTERS**

4 16. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Technician  
5 License Number TCH 172212 to Rayanne Helen Heimforth, Rayanne Helen Heimforth shall be  
6 prohibited from serving as a manager, administrator, owner, member, officer, director, associate,  
7 or partner of a licensee for five years if Pharmacy Technician License Number TCH 172212 is  
8 placed on probation or until Pharmacy Technician License Number TCH 172212 is reinstated if it  
9 is revoked.

10 **PRAYER**

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

13 1. Revoking or suspending Pharmacy Technician License Number TCH 172212, issued  
14 to Rayanne Helen Heimforth;

15 2. Prohibiting Rayanne Helen Heimforth from serving as a manager, administrator, owner,  
16 member, officer, director, associate, or partner of a licensee for five years if Pharmacy Technician  
17 License Number TCH 172212 is placed on probation or until Pharmacy Technician License  
18 Number TCH 172212 is reinstated if Pharmacy Technician License Number TCH 172212 issued  
19 to Rayanne Helen Heimforth is revoked;

20 3. Ordering Rayanne Helen Heimforth to pay the Board of Pharmacy the reasonable  
21 costs of the investigation and enforcement of this case, pursuant to Business and Professions  
22 Code section 125.3 and if placed on probation, the costs of probation monitoring; and

23 4. Taking such other and further action as deemed necessary and proper.

24 DATED: 11/15/2024

Sodergren,  
Anne@DCA  
Digitally signed by Sodergren,  
Anne@DCA  
Date: 2024.11.15 13:25:54 -08'00'

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

25  
26  
27  
28 LA2024602475  
67154702.docx