



**California State Board of Pharmacy**  
 2720 Gateway Oaks Drive, Suite 100  
 Sacramento, CA 95833  
 Phone: (916) 518-3100 Fax: (916) 574-8614  
 www.pharmacy.ca.gov

Business, Consumer Services and Housing Agency  
 Department of Consumer Affairs  
 Gavin Newsom, Governor



**APPLICATION FOR VOLUNTARY SURRENDER OF PHARMACY TECHNICIAN LICENSE**

**PLEASE PRINT IN BLACK OR BLUE INK OR TYPE YOUR RESPONSES:**

Name of Licensee: Stephanie Baez	Case No.
Address of Record:  2666 E Tyler St Long Beach, CA 90810  	7876

Pursuant to the terms and conditions of my probation with the California State Board of Pharmacy (Board) in Case No. 7876, I hereby request to surrender my pharmacy technician license, License No. 168261. The Board or its designee shall have the discretion whether to grant the request for surrender or take any other action it deems appropriate and reasonable. Upon formal acceptance of the surrender of the license, I will no longer be subject to the terms and conditions of probation. I understand that this surrender constitutes a record of discipline and shall become a part of my license history with the Board.

Upon the acceptance of the surrender, I shall relinquish my pharmacy technician license to the Board within ten (10) days of notification by the Board that the surrender is accepted. I understand that I may not reapply for any license, permit, or registration from the board for three (3) years from the effective date of the surrender. I further understand that I shall meet all requirements applicable to the license sought as of the date the application for that license is submitted to the Board, including any outstanding costs.

PLEASE BE ADVISED THAT YOU ARE NOT RELIEVED OF THE REQUIREMENTS OF YOUR PROBATION UNLESS THE BOARD NOTIFIES YOU THAT YOUR REQUEST TO SURRENDER YOUR LICENSE HAS BEEN ACCEPTED.

  
\_\_\_\_\_  
Applicant's Signature

06-30-2025  
\_\_\_\_\_  
Date

Stephanie Baez  
\_\_\_\_\_  
Applicant's Printed Name

\_\_\_\_\_  
Applicant's License Number  
168261

\_\_\_\_\_  
Executive Officer's Approval

\_\_\_\_\_  
Date

All items on this application are mandatory in accordance with your probationary order and the Board's Disciplinary Guidelines as authorized by Title 16, California Code of Regulations section 1760. Failure to provide any of the requested information or providing unreadable information will result in the application being rejected as incomplete. The information provided on this form will be used to determine eligibility for surrender. The official responsible for information maintenance is the Executive Officer, telephone (916) 518-3100, 2720 Gateway Oaks Drive, Suite 100, Sacramento, CA 95833. The information you provide may also be disclosed in the following circumstances: (1) in response to a Public Records Act request; (2) to another government agency as required by state or federal law; or, (3) in response to a court or administrative order, a subpoena, or a search warrant. Each individual has the right to review the files or records maintained on them by our agency, unless the records are identified as confidential information and exempted by Section 1798.40 of the Civil Code.

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

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

**STEPHANIE BAEZ**

**Pharmacy Technician License No. TCH 168261**

**Respondent.**

**Agency Case No. 7876**

**OAH No. 2024100585**

**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 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

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Attorney General of California  
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8  
9 **BEFORE THE**  
**BOARD OF PHARMACY**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11  
12 In the Matter of the Accusation Against:  
13 **STEPHANIE BAEZ**  
2666 E. Tyler St.  
14 Long Beach, CA 90810  
15 **Pharmacy Technician License No. TCH**  
**168261**  
16 Respondent.

Case No. 7876  
OAH No. 2024100585  
**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY 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  
24 by Rob Bonta, Attorney General of the State of California, by Elyse M. Davidson, Deputy  
25 Attorney General.

26 2. Respondent Stephanie Baez (“Respondent”) is represented in this proceeding by  
27 attorney Carolyn Park, whose address is: 137 S. Prospect Avenue, Tustin, CA 92780,

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1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Pharmacy Technician License No. TCH 168261 issued to  
3 Respondent Stephanie Baez is revoked. However, the revocation is stayed and Respondent is  
4 placed on probation for five (5) years on the following terms and conditions:

5 **1. Obey All Laws**

6 Respondent shall obey all state and federal laws and regulations.

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

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

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

21 **2. Report to the Board**

22 Respondent shall report to the board quarterly, on a schedule as directed by the board or its  
23 designee. The report shall be made either in person or in writing, as directed. Among other  
24 requirements, respondent shall state in each report under penalty of perjury whether there has  
25 been compliance with all the terms and conditions of probation.

26 Failure to submit timely reports in a form as directed shall be considered a violation of  
27 probation. Any period(s) of delinquency in submission of reports as directed may be added to the  
28 total period of probation. Moreover, if the final probation report is not made as directed,

1 probation shall be automatically extended until such time as the final report is made and accepted  
2 by the board.

3 **3. Interview with the Board**

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

9 **4. Cooperate with Board Staff**

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

16 **5. Reporting of Employment and Notice to Employers**

17 During the period of probation, respondent shall notify all present and prospective  
18 employers of the decision in case number 7876 and the terms, conditions and restrictions imposed  
19 on respondent by the decision, as follows:

20 Within thirty (30) days of the effective date of this decision, and within ten (10) days of  
21 undertaking any new employment, respondent shall report to the board in writing the name,  
22 physical address, and mailing address of each of her employer(s), and the name(s) and telephone  
23 number(s) of all of her direct supervisor(s), as well as any pharmacist(s)-in-charge, designated  
24 representative(s)-in-charge, responsible manager, or other compliance supervisor(s) and the work  
25 schedule, if known. Respondent shall also include the reason(s) for leaving the prior employment.  
26 Respondent shall sign and return to the board a written consent authorizing the board or its  
27 designee to communicate with all of respondent's employer(s) and supervisor(s), and authorizing  
28 those employer(s) or supervisor(s) to communicate with the board or its designee, concerning

1 respondent's work status, performance, and monitoring. Failure to comply with the requirements  
2 or deadlines of this condition shall be considered a violation of probation.

3         Within thirty (30) days of the effective date of this decision, and within fifteen (15) days of  
4 respondent undertaking any new employment, respondent shall cause (a) her direct supervisor, (b)  
5 her pharmacist-in-charge, designated representative-in-charge, responsible manager, or other  
6 compliance supervisor, and (c) the owner or owner representative of her employer, to report to the  
7 board in writing acknowledging that the listed individual(s) has/have read the decision in case  
8 number 7876, and terms and conditions imposed thereby. If one person serves in more than one  
9 role described in (a), (b), or (c), the acknowledgment shall so state. It shall be the respondent's  
10 responsibility to ensure that these acknowledgment(s) are timely submitted to the board. In the  
11 event of a change in the person(s) serving the role(s) described in (a), (b), or (c) during the term  
12 of probation, respondent shall cause the person(s) taking over the role(s) to report to the board in  
13 writing within fifteen (15) days of the change acknowledging that he or she has read the decision  
14 in case number 7876, and the terms and conditions imposed thereby.

15         If respondent works for or is employed by or through an employment service, respondent  
16 must notify the person(s) described in (a), (b), and (c) above at every entity licensed by the board  
17 of the decision in case number 7876, and the terms and conditions imposed thereby in advance of  
18 respondent commencing work at such licensed entity. A record of this notification must be  
19 provided to the board upon request.

20         Furthermore, within thirty (30) days of the effective date of this decision, and within fifteen  
21 (15) days of respondent undertaking any new employment by or through an employment service,  
22 respondent shall cause the person(s) described in (a), (b), and (c) above at the employment service  
23 to report to the board in writing acknowledging that he or she has read the decision in case  
24 number, and the terms and conditions imposed thereby. It shall be respondent's responsibility to  
25 ensure that these acknowledgment(s) are timely submitted to the board.

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

1 "Employment" within the meaning of this provision includes any full-time, part-time,  
2 temporary, relief, or employment/management service position as a pharmacy technician, or any  
3 position for which a pharmacy technician is a requirement or criterion for employment, whether  
4 the respondent is an employee, independent contractor or volunteer.

5 **6. Notification of Change(s) in Name, Address(es), or Phone Number(s)**

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

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

10 **7. Reimbursement of Board Costs**

11 As a condition precedent to successful completion of probation, respondent shall pay to the  
12 board its costs of investigation and prosecution in the amount of \$2,000.00.

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

16 **8. Probation Monitoring Costs**

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

21 **9. Status of License**

22 Respondent shall, at all times while on probation, maintain an active, current Pharmacy  
23 Technician License with the board, including any period during which suspension or probation is  
24 tolled. Failure to maintain an active, current Pharmacy Technician License shall be considered a  
25 violation of probation.

26 If respondent's Pharmacy Technician License expires or is cancelled by operation of law or  
27 otherwise at any time during the period of probation, including any extensions thereof due to

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1 tolling or otherwise, upon renewal or reapplication respondent's license shall be subject to all  
2 terms and conditions of this probation not previously satisfied.

3 **10. License Surrender While on Probation/Suspension**

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

12 Upon acceptance of the surrender, respondent shall relinquish her pocket and/or wall  
13 license, including any indicia of licensure not previously provided to the board within ten (10)  
14 days of notification by the board that the surrender is accepted if not already provided.  
15 Respondent may not reapply for any license from the board for three (3) years from the effective  
16 date of the surrender. Respondent shall meet all requirements applicable to the license sought as  
17 of the date the application for that license is submitted to the board, including any outstanding  
18 costs.

19 **11. Certification Prior to Resuming Work**

20 Respondent shall be suspended, and shall not work as a pharmacy technician, until she has  
21 been certified as defined by Business and Professions Code section 4202, subdivision (a)(4), has  
22 submitted proof of certification to the board, and has been notified by the board or its designee  
23 that she may begin work. Failure to achieve certification within six (6) months of the effective  
24 date shall be considered a violation of probation.

25 During suspension, respondent shall not enter any pharmacy area or any portion of any  
26 other board licensed premises of a wholesaler, third-party logistics provider, veterinary food-  
27 animal drug retailer or any other distributor of drugs which is licensed by the board, or any

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1 manufacturer, or any area where dangerous drugs and/or dangerous devices or controlled  
2 substances are maintained.

3 Respondent shall not do any act involving drug selection, selection of stock, manufacturing,  
4 compounding or dispensing; nor shall respondent manage, administer, or assist any licensee of the  
5 board. Respondent shall not have access to or control the ordering, distributing, manufacturing or  
6 dispensing of dangerous drugs and/or dangerous devices or controlled substances.

7 During this suspension, respondent shall not engage in any activity that requires licensure  
8 as a pharmacy technician. Respondent shall not direct or control any aspect of the practice of  
9 pharmacy or of the manufacture, distribution, wholesaling, or retailing of dangerous drugs and/or  
10 dangerous devices, or controlled substances.

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

12 Respondent shall maintain an active, current certification as defined by Business and  
13 Professions Code section 4202, subdivision (a)(4), for the entire period of probation, and shall  
14 submit proof of re-certification or renewal of certification to the board within ten (10) days of  
15 receipt. Failure to maintain active, current certification or to timely submit proof of same shall be  
16 considered a violation of probation.

17 **12. Practice Requirement – Extension of Probation**

18 Except during periods of suspension, respondent shall, at all times while on probation, be  
19 employed as a pharmacy technician in California for a minimum of 80 hours per calendar month.  
20 Any month during which this minimum is not met shall extend the period of probation by one  
21 month. During any such period of insufficient employment, respondent must nonetheless comply  
22 with all terms and conditions of probation, unless respondent receives a waiver in writing from  
23 the board or its designee.

24 If respondent does not practice as a pharmacy technician in California for the minimum  
25 number of hours in any calendar month, for any reason (including vacation), respondent shall  
26 notify the board in writing within ten (10) days of the conclusion of that calendar month. This  
27 notification shall include at least: the date(s), location(s), and hours of last practice; the reason(s)  
28 for the interruption or reduction in practice; and the anticipated date(s) on which respondent will

1 resume practice at the required level. Respondent shall further notify the board in writing within  
2 ten (10) days following the next calendar month during which respondent practices as a pharmacy  
3 technician in California for the minimum of hours. Any failure to timely provide such  
4 notification(s) shall be considered a violation of probation.

5 It is a violation of probation for respondent's probation to be extended pursuant to the  
6 provisions of this condition for a total period, counting consecutive and non-consecutive months,  
7 exceeding thirty-six (36) months. The board or its designee may post a notice of the extended  
8 probation period on its website.

9 **13. Violation of Probation**

10 If respondent has not complied with any term or condition of probation, the board shall  
11 have continuing jurisdiction over respondent, and the board shall provide notice to respondent  
12 that probation shall automatically be extended, until all terms and conditions have been satisfied  
13 or the board has taken other action as deemed appropriate to treat the failure to comply as a  
14 violation of probation, to terminate probation, and to impose the penalty that was stayed. The  
15 board or its designee may post a notice of the extended probation period on its website.

16 If respondent violates probation in any respect, the board, after giving respondent notice  
17 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that  
18 was stayed. If a petition to revoke probation or an accusation is filed against respondent during  
19 probation, or the preparation of an accusation or petition to revoke probation is requested from  
20 the Office of the Attorney General, the board shall have continuing jurisdiction and the period of  
21 probation shall be automatically extended until the petition to revoke probation or accusation is  
22 heard and decided, and the charges and allegations in Accusation No. 7876 shall be deemed true  
23 and correct.

24 **14. Completion of Probation**

25 Upon written notice by the board or its designee indicating successful completion of  
26 probation, respondent's license will be fully restored.

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**15. Clinical Diagnostic Evaluation**

Within thirty (30) days of the effective date of this decision, and on a periodic basis thereafter if required by the board or its designee, respondent shall undergo, at her own expense, clinical diagnostic evaluation(s) by a practitioner selected or approved prior to the evaluation by the board or its designee. The approved evaluator shall be provided with a copy of the board's accusation and decision. Respondent shall sign a release authorizing the evaluator to furnish the board with a current diagnosis and a written report regarding the respondent's judgment and ability to function independently as a pharmacy technician with safety to the public. If the evaluator recommends restrictions or conditions on respondent's practice, including but not limited to other terms and conditions listed in these guidelines (e.g., required psychotherapy, inpatient treatment, prescription coordination and monitoring, restricted practice), the board or its designee may by written notice to respondent adopt any such restrictions or conditions as additional probation terms and conditions, violation of which shall be considered a violation of probation. Failure to comply with any requirement or deadline stated by this paragraph shall be considered a violation of probation.

If at any time the approved evaluator or therapist determines that respondent is unable to practice safely or independently, the licensed mental health practitioner shall notify the board immediately by telephone and follow up by written letter within three (3) working days. Upon notification from the board or its designee of this determination, respondent shall be automatically suspended and shall not resume practice until notified by the board or its designee that practice may resume.

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

**16. Psychotherapy**

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 and qualifications of a licensed mental health practitioner of respondent's choice. Within thirty (30) days of approval thereof, respondent shall submit documentation to the board demonstrating the commencement of psychotherapy with the

1 approved licensed mental health practitioner. Should respondent, for any reason, cease treatment  
2 with the approved licensed mental health practitioner, respondent shall notify the board  
3 immediately and, within thirty (30) days of ceasing treatment, submit the name of a replacement  
4 psychotherapist or licensed mental health practitioner of respondent's choice to the board for its  
5 prior approval. Within thirty (30) days of approval thereof, respondent shall submit  
6 documentation to the board demonstrating the commencement of psychotherapy with the  
7 approved replacement. Failure to comply with any requirement or deadline stated by this  
8 paragraph shall be considered a violation of probation.

9       Upon approval of the initial or any subsequent licensed mental health practitioner,  
10 respondent shall undergo and continue treatment with that therapist, at respondent's own expense,  
11 until the therapist recommends in writing to the board, and the board or its designee agrees by  
12 way of a written notification to respondent, that no further psychotherapy is necessary. Upon  
13 receipt of such recommendation from the treating therapist, and before determining whether to  
14 accept or reject said recommendation, the board or its designee may require respondent to  
15 undergo, at respondent's own expense, a mental health evaluation by a board-appointed or board-  
16 approved psychiatrist or psychologist. If the approved evaluator recommends that respondent  
17 continue psychotherapy, the board or its designee may require respondent to continue  
18 psychotherapy.

19       Psychotherapy shall be at least once a week unless otherwise approved by the board.  
20 Respondent shall provide the therapist with a copy of the board's accusation and decision no later  
21 than the first therapy session. Respondent shall take all necessary steps to ensure that the treating  
22 therapist submits written quarterly reports to the board concerning respondent's fitness to  
23 practice, progress in treatment, and such other information required by the board or its designee.

24       If at any time the treating therapist determines that respondent cannot practice safely or  
25 independently, the therapist shall notify the board immediately by telephone and follow up by  
26 written letter within three (3) working days. Upon notification from the board or its designee of  
27 this determination, respondent shall be automatically suspended and shall not resume practice  
28 until notified by the board that practice may be resumed.

1 During any suspension, respondent shall not enter any pharmacy area or any portion of the  
2 licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug  
3 retailer, or any other distributor of drugs which is licensed by the board, or any manufacturer, or  
4 any area where dangerous drugs and/or dangerous devices or controlled substances are  
5 maintained.

6 Respondent shall not practice pharmacy nor do any act involving drug selection, selection  
7 of stock, manufacturing, compounding, dispensing or patient consultation; nor shall respondent  
8 manage, administer, or be a consultant to any licensee of the board, or have access to or control  
9 the ordering, distributing, manufacturing or dispensing of dangerous drugs and/or dangerous  
10 devices or controlled substances. Respondent shall not resume practice until notified by the board.

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

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

17 **17. Drug and Alcohol Testing**

18 Respondent, at her own expense, shall participate in testing as directed by the board or its  
19 designee for the detection of alcohol, controlled substances, and dangerous drugs and/or  
20 dangerous devices. Testing protocols may include biological fluid testing (urine, blood),  
21 breathalyzer, hair follicle testing, or other testing protocols as directed by the board or its  
22 designee. All testing must be pursuant to an observed testing protocol, unless respondent is  
23 informed otherwise in writing by the board or its designee. Respondent may be required to  
24 participate in testing for the entire probation period and frequency of testing will be determined  
25 by the board or its designee.

26 By no later than thirty (30) days after the effective date of this decision, respondent shall  
27 have completed all of the following tasks: enrolled and registered with an approved drug and  
28 alcohol testing vendor; provided that vendor with any documentation, and any information

1 necessary for payment by respondent; commenced testing protocols, including all required  
2 contacts with the testing vendor to determine testing date(s); and begun testing. At all times,  
3 respondent shall fully cooperate with the testing vendor, and with the board or its designee, with  
4 regard to enrollment, registration, and payment for, and compliance with, testing. Any failure to  
5 cooperate timely shall be considered a violation of probation.

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

9 Prior to any vacation or other period of absence from the area where the approved testing  
10 vendor provides services, respondent shall seek and receive approval from the board or its  
11 designee to use an alternate testing vendor to ensure testing can occur. Upon approval, respondent  
12 shall enroll and register with the approved alternate drug testing vendor, provide to that alternate  
13 vendor any documentation required by the vendor, including any necessary payment by  
14 respondent. During the period of absence of the area, respondent shall commence testing  
15 protocols with the alternate vendor, including required daily contacts with the testing vendor to  
16 determine if testing is required, and required testing. Any failure to timely seek or receive  
17 approval from the board or its designee, or to timely enroll and register with, timely commence  
18 testing protocols with, or timely undergo testing with, the alternate testing vendor, shall be  
19 considered a violation of probation.

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

25 Any of the following shall be considered a violation of probation and shall result in  
26 respondent being immediately suspended from practice as a pharmacy technician until notified by  
27 the board in writing that she may resume practice: failure to timely complete all of the steps  
28 required for enrollment/registration with the drug testing vendor, including making arrangements

1 for payment; failure to timely commence drug testing protocols; failure to contact the drug testing  
2 vendor as required to determine testing date(s); failure to test as required; failure to timely supply  
3 documentation demonstrating that a detected substance was taken pursuant to a legitimate  
4 prescription issued as a necessary part of treatment; and/or detection through testing of alcohol, or  
5 of an illicit drug, or of a controlled substance or dangerous drug absent documentation that the  
6 detected substance was taken pursuant to a legitimate prescription and a necessary treatment. In  
7 the event of a suspension ordered after detection through testing of alcohol, an illicit drug, or of a  
8 controlled substance or dangerous drug absent documentation that the detected substance was  
9 taken pursuant to a legitimate prescription and a necessary treatment, the board or its designee  
10 shall inform respondent of the suspension and inform her to immediately leave work, and shall  
11 notify respondent's employer(s) and work site monitor(s) of the suspension.

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

21       During any such suspension, respondent shall not engage in any activity that requires the  
22 professional judgment of and/or licensure as a pharmacy technician. Respondent shall not direct  
23 or control any aspect of the practice of pharmacy, or of the manufacturing, distributing,  
24 wholesaling, or retailing of dangerous drugs and/or dangerous devices.

25       Failure to comply with any such suspension shall be considered a violation of probation.  
26 Failure to comply with any requirement or deadline stated by this term shall be considered a  
27 violation of probation.

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1                   **18. Notification of Departure**

2                   Prior to leaving the probationary geographic area designated by the board or its designee for  
3 a period greater than twenty-four (24) hours, respondent shall notify the board verbally and in  
4 writing of the dates of departure and return. Failure to comply with this provision shall be  
5 considered a violation of probation.

6                   **19. Abstain from Drugs and Alcohol**

7                   Respondent shall completely abstain from the possession or use of alcohol, controlled  
8 substances, illicit drugs, dangerous drugs and/or dangerous devices, or their associated  
9 paraphernalia, except when possessed or used pursuant to a legitimate prescription issued as a  
10 necessary part of treatment. Respondent shall ensure that she is not in the same physical location  
11 as individuals who are using illicit substances even if respondent is not personally ingesting the  
12 drugs. Any possession or use of alcohol, dangerous drugs and/or dangerous devices or controlled  
13 substances, or their associated paraphernalia for which a legitimate prescription has not been  
14 issued as a necessary part of treatment, or any physical proximity to persons using illicit  
15 substances, shall be considered a violation of probation.

16                   **20. Prescription Coordination and Monitoring of Prescription Use**

17                   Within thirty (30) days of the effective date of this decision, respondent shall submit to the  
18 board, for its prior approval, the name and qualifications of a single physician, nurse practitioner,  
19 physician assistant, or psychiatrist of respondent's choice, who shall be aware of the respondent's  
20 history with the use of controlled substances, and/or dangerous drugs and who will coordinate and  
21 monitor any prescriptions for respondent for dangerous drugs and/or dangerous devices,  
22 controlled substances or mood-altering drugs. The approved practitioner shall be provided with a  
23 copy of the board's Accusation and decision. A record of this notification must be provided to the  
24 board or its designee upon request. Respondent shall sign a release authorizing the practitioner to  
25 communicate with the board or its designee about respondent's treatment(s). The coordinating  
26 physician, nurse practitioner, physician assistant, or psychiatrist shall report to the board on a  
27 quarterly basis for the duration of probation regarding respondent's compliance with this  
28 condition. If any substances considered addictive have been prescribed, the report shall identify a

1 program for the time limited use of any such substances. The board or its designee may require  
2 that the single coordinating physician, nurse practitioner, physician assistant or psychiatrist be a  
3 specialist in addictive medicine, or consult a specialist in addictive medicine. Should respondent,  
4 for any reason, cease supervision by the approved practitioner, respondent shall notify the board  
5 or its designee immediately and, within thirty (30) days of ceasing supervision, submit the name  
6 of a replacement physician, nurse practitioner, physician assistant, or psychiatrist of respondent's  
7 choice to the board or its designee for its prior approval. Failure to timely submit the selected  
8 practitioner or replacement practitioner to the board or its designee for approval, or to ensure the  
9 required quarterly reporting thereby, shall be considered a violation of probation.

10 If at any time an approved practitioner determines that respondent is unable to practice  
11 safely or independently as a pharmacy technician, the practitioner shall notify the board or its  
12 designee immediately by telephone and follow up by written letter within three (3) working days.  
13 Upon notification from the board or its designee of this determination, respondent shall be  
14 automatically suspended and shall not resume practice as a pharmacy technician until notified by  
15 the board or its designee that practice may be resumed.

16 During any suspension, respondent shall not enter any pharmacy area or any portion of the  
17 licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug  
18 retailer, or any other distributor of drugs which is licensed by the board, or any manufacturer, or  
19 any area where dangerous drugs and/or dangerous devices or controlled substances are  
20 maintained. Respondent shall not practice pharmacy nor do any act involving drug selection,  
21 selection of stock, manufacturing, compounding, dispensing or patient consultation; nor shall  
22 respondent manage, administer, or be a consultant to any licensee of the board, or have access to  
23 or control the ordering, distributing, manufacturing or dispensing of dangerous drugs and/or  
24 dangerous devices and controlled substances. Respondent shall not resume practice until notified  
25 by the board.

26 During any suspension, respondent shall not engage in any activity that requires the  
27 professional judgment and/or licensure as a pharmacy technician. Respondent shall not direct or

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1 control any aspect of the practice of pharmacy or of the manufacturing, distributing, wholesaling,  
2 or retailing of dangerous drugs and/or dangerous devices or controlled substances.

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

5 **21. Attend Substance Abuse Recovery Relapse Prevention and Support Groups**

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

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

18 **22. No Ownership or Management of Licensed Premises**

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

26 Respondent shall not acquire any new ownership, legal or beneficial interest nor serve as a  
27 manager, administrator, member, officer, director, trustee, associate, or partner of any additional  
28 business, firm, partnership, or corporation licensed by the board. If respondent currently owns or

1 has any legal or beneficial interest in, or serves as a manager, administrator, member, officer,  
2 director, trustee, associate, or partner of any business, firm, partnership, or corporation currently  
3 or hereinafter licensed by the board, respondent may continue to serve in such capacity or hold  
4 that interest, but only to the extent of that position or interest as of the effective date of this  
5 decision. Violation of this restriction shall be considered a violation of probation.

6 **ACCEPTANCE**

7 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
8 discussed it with my attorney, Carolyn Park. I understand the stipulation and the effect it will  
9 have on my Pharmacy Technician License. I enter into this Stipulated Settlement and Disciplinary  
10 Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order  
11 of the Board of Pharmacy.

12  
13 DATED: \_\_\_\_\_

\_\_\_\_\_  
14 STEPHANIE BAEZ  
*Respondent*

15 I have read and fully discussed with Respondent Stephanie Baez the terms and conditions  
16 and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve  
17 its form and content.

18  
19 DATED: \_\_\_\_\_

\_\_\_\_\_  
20 CAROLYN PARK  
*Attorney for Respondent*

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23 ///

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25 ///

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1 has any legal or beneficial interest in, or serves as a manager, administrator, member, officer,  
2 director, trustee, associate, or partner of any business, firm, partnership, or corporation currently  
3 or hereinafter licensed by the board, respondent may continue to serve in such capacity or hold  
4 that interest, but only to the extent of that position or interest as of the effective date of this  
5 decision. Violation of this restriction shall be considered a violation of probation.

6 **ACCEPTANCE**

7 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
8 discussed it with my attorney, Carolyn Park. I understand the stipulation and the effect it will  
9 have on my Pharmacy Technician License. I enter into this Stipulated Settlement and Disciplinary  
10 Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order  
11 of the Board of Pharmacy.

12  
13 DATED: 02 / 20 / 2025



14 \_\_\_\_\_  
STEPHANIE BAEZ  
*Respondent*

15 I have read and fully discussed with Respondent Stephanie Baez the terms and conditions  
16 and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve  
17 its form and content.

18  
19 DATED: 02/20/2025



20 \_\_\_\_\_  
CAROLYN PARK  
*Attorney for 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  
ARMANDO ZAMBRANO  
Supervising Deputy Attorney General

ELYSE M. DAVIDSON  
Deputy Attorney General  
*Attorneys for Complainant*

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**ENDORSEMENT**

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

DATED: \_02/20/2025

Respectfully submitted,

ROB BONTA  
Attorney General of California  
ARMANDO ZAMBRANO  
Supervising Deputy Attorney General



ELYSE M. DAVIDSON  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 7876**

1 ROB BONTA  
Attorney General of California  
2 ARMANDO ZAMBRANO  
Supervising Deputy Attorney General  
3 ELYSE M. DAVIDSON  
Deputy Attorney General  
4 State Bar No. 285842  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6632  
6 Facsimile: (916) 731-2126  
E-mail: Elyse.Davidson@doj.ca.gov  
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

Case No. 7876

13 **STEPHANIE BAEZ**  
14 2666 E. Tyler St.  
Long Beach, CA 90810

**ACCUSATION**

15 **Pharmacy Technician License No. TCH**  
16 **168261**

17 Respondent.

18  
19 **PARTIES**

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

23 2. On or about August 28, 2018, the Board issued Pharmacy Technician License  
24 Number TCH 168261 to Stephanie Baez (“Respondent”). The Pharmacy Technician License was  
25 in full force and effect at all times relevant to the charges brought herein and will expire on  
26 September 30, 2025, unless renewed. Pursuant to an Interim Suspension Order issued on August  
27 21, 2024, the license is also currently suspended.

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

8 5. Section 4300 states, in pertinent part, that “[e]very license issued may be suspended  
9 or revoked.”

10 6. Section 4300.1 of the Code states:

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

16 **STATUTORY PROVISIONS**

17 7. Section 477 states, in part: “As used in this division: . . . (b) ‘License’ includes  
18 certificate, registration or other means to engage in a business or profession regulated by this  
19 code.”

20 8. Section 4301 of the Code states:

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

23 ...

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

26 ...

27 (j) The violation of any of the statutes of this state, of any other state, or of the United  
28 States regulating controlled substances and dangerous drugs.

...

(o) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of or conspiring to violate any provision or term of this chapter or of the applicable federal and state laws and regulations governing pharmacy, including regulations established by the board or by any other state or federal regulatory agency.

9. Section 4059 of the Code states:

(a) A person may not furnish any dangerous drug, except upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7. A person may not furnish any dangerous device, except upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7. . . .

10. Section 4060 of the Code states:

A person shall not possess any controlled substance, except that furnished to a person upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, nurse practitioner practicing pursuant to Section 2837.103 or 2837.104, or naturopathic doctor pursuant to Section 3640.7, or furnished pursuant to a drug order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse practitioner practicing pursuant to Section 2836.1, a physician assistant pursuant to Section 3502.1, a naturopathic doctor pursuant to Section 3640.5, or a pharmacist pursuant to Section 4052.1, 4052.2, or 4052.6. This section does not apply to the possession of any controlled substance by a manufacturer, wholesaler, third-party logistics provider, pharmacy, pharmacist, physician, podiatrist, dentist, optometrist, veterinarian, naturopathic doctor, certified nurse-midwife, nurse practitioner, or physician assistant, if in stock in containers correctly labeled with the name and address of the supplier or producer. . . .

11. Section 4307 of the Code states:

(a) Any person who has been denied a license or whose license has been revoked or is under suspension, or who has failed to renew his or her license while it was under suspension, or who has been a manager, administrator, owner, member, officer, director, associate, partner, or any other person with management or control of any partnership, corporation, trust, firm, or association whose application for a license has been denied or revoked, is under suspension or has been placed on probation, and while acting as the manager, administrator, owner, member, officer, director, associate, partner, or any other person with management or control had knowledge of or knowingly participated in any conduct for which the license was denied, revoked, suspended, or placed on probation, shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, partner, or in any other position with management or control of a licensee as follows:

(1) Where a probationary license is issued or where an existing license is placed on probation, this prohibition shall remain in effect for a period not to exceed five years.

(2) Where the license is denied or revoked, the prohibition shall continue until the license is issued or reinstated.

///

1 (b) “Manager, administrator, owner, member, officer, director, associate, partner, or  
2 any other person with management or control of a license” as used in this section and  
3 Section 4308, may refer to a pharmacist or to any other person who serves in such  
4 capacity in or for a licensee.

5 (c) The provisions of subdivision (a) may be alleged in any pleading filed pursuant  
6 to Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the  
7 Government Code. However, no order may be issued in that case except as to a person  
8 who is named in the caption, as to whom the pleading alleges the applicability of this  
9 section, and where the person has been given notice of the proceeding as required by  
10 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the  
11 Government Code. The authority to proceed as provided by this subdivision shall be  
12 in addition to the board’s authority to proceed under Section 4339 or any other  
13 provision of law.

14 12. Section 11170 of the Health and Safety Code states:

15 No person shall prescribe, administer, or furnish a controlled substance for himself.

16 13. Section 11171 of the Health and Safety Code states:

17 No person shall prescribe, administer, or furnish a controlled substance except under  
18 the conditions and in the manner provided by this division.

19 14. Section 11173 of the Health and Safety Code states:

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

24 (b) No person shall make a false statement in any prescription, order, report, or  
25 record, required by this division.

26 ...

27 15. Section 11350 of the Health and Safety Code states:

28 (a) Except as otherwise provided in this division, every person who possesses (1)  
any controlled substance specified in subdivision (b), (c), (e), or paragraph (1) of  
subdivision (f) of Section 11054, specified in paragraph (14), (15), or (20) of  
subdivision (d) of Section 11054, or specified in subdivision (b) or (c) of Section  
11055, or specified in subdivision (h) of Section 11056, or (2) any controlled  
substance classified in Schedule III, IV, or V which is a narcotic drug, unless upon  
the written prescription of a physician, dentist, podiatrist, or veterinarian licensed to  
practice in this state, shall be punished by imprisonment in a county jail for not more  
than one year, except that such person shall instead be punished pursuant to  
subdivision (h) of Section 1170 of the Penal Code if that person has one or more prior  
convictions for an offense specified in clause (iv) of subparagraph (C) of paragraph  
(2) of subdivision (e) of Section 667 of the Penal Code or for an offense requiring  
registration pursuant to subdivision (c) of Section 290 of the Penal Code.

///

1 **COST RECOVERY**

2 16. Section 125.3 provides that the Board may request the administrative law judge to  
3 direct a licentiate found to have committed a violation or violations of the licensing act to pay a  
4 sum not to exceed the reasonable costs of the investigation and enforcement of the case, with  
5 failure of the licentiate to comply subjecting the license to not being renewed or reinstated. If a  
6 case settles, recovery of investigation and enforcement costs may be included in a stipulated  
7 settlement.

8 **CONTROLLED SUBSTANCE / DANGEROUS DRUG**

9 17. Section 4021 of the Code states, in pertinent part:

10 “Controlled substances: means any substance listed in Chapter 2 (commencing with Section  
11 11053) of Division 10 of the Health and Safety Code.”

12 18. Section 4022 of the Code states:

13 ‘Dangerous drug’ or ‘dangerous device’ means any drug or device unsafe for self-use  
14 in humans or animals, and includes the following:

15 (a) Any drug that bears the legend: ‘Caution: federal law prohibits dispensing without  
16 prescription,’ ‘Rx only,’ or words of similar import.

17 (b) Any device that bears the statement: ‘Caution: federal law restricts this device to  
18 sale by or on the order of a \_\_\_\_\_,’ ‘Rx only,’ or words of similar import, the  
19 blank to be filled in with the designation of the practitioner licensed to use or order  
20 use of the device.

21 (c) Any other drug or device that by federal or state law can be lawfully dispensed  
22 only on prescription or furnished pursuant to Section 4006.

23 19. Zolpidem (brand name Ambien) is classified as a schedule IV controlled substance as  
24 designated in Health and Safety Code section 11057, subdivision (d)(32) and a dangerous drug as  
25 designated in Business and Professions Code section 4022. It is used to treat insomnia.

26 **FACTUAL ALLEGATIONS**

27 20. Beginning in 2018, through March 27, 2024, Respondent was employed as a  
28 registered pharmacy technician at Garfield Beach CVS, L.L.C., CVS/Pharmacy #17385 (“CVS  
Pharmacy”) located at 950 East 33rd Street, Signal Hill, California 90755.

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1           21. On or about December 23, 2023, a pharmacist at CVS Pharmacy conducted a routine  
2 cycle count and determined a discrepancy with the balance changes for Zolpidem Tartrate 10 mg  
3 tablets.

4           22. On or about January 31, 2024, CVS Pharmacy began an investigation. On or about  
5 March 8, 2024 and March 10, 2024, CVS Pharmacy conducted cycle counts of Zolpidem Tartrate  
6 10 mg and determined discrepancies on both days of -2 tablets and -1 tablet, respectively. The  
7 investigation revealed that Respondent was present on both days and was a suspect for the  
8 missing tablets.

9           23. On or about March 17, 2024, a District Asst Protection Leader conducted an  
10 interview with Respondent. During this interview, Respondent admitted that she started diverting  
11 drugs from CVS Pharmacy in March or April of 2023. She stated that she diverted approximately  
12 seventy-five (75) tablets of Zolpidem Tartrate 10 mg. Respondent admitted that she would go to  
13 the shelf, take the controlled substance by hand and conceal it in her personal bag when the  
14 Pharmacist would walk away from the area.

15           24. On or about March 17, 2024, a Signal Hill Police Department officer arrived at CVS  
16 Pharmacy due to a report of theft. The officer interviewed Respondent and other store staff.  
17 During the interview, Respondent admitted that she began by taking one tablet at a time and then  
18 increased the amount to four to five tablets at a time. Respondent stated that she took  
19 approximately seventy-five (75) tablets of Zolpidem Tartrate 10 mg. Respondent stated that the  
20 last time she stole from CVS Pharmacy was on March 16, 2024.

21           25. Respondent was terminated from CVS Pharmacy on March 27, 2024.

22           26. CVS Pharmacy conducted an audit from April 30, 2023 to March 17, 2024, and  
23 determined a total loss of 548 tablets of Zolpidem Tartrate 10 mg.

24           27. On or about April 10, 2024, CVS Pharmacy submitted Drug Enforcement Agency  
25 (“DEA”) Form 106, Report of Theft or Loss of Controlled Substances to the Board and reported  
26 and reported the following list of controlled substances, as lost or stolen:

27 ///

28 ///

<b>Drug</b>	<b>Quantity lost or stolen</b>
ZOLPIDEM TARTRATE 10 MG TABLET	426
ZOLPIDEM TARTRATE 10 MG TABLET	76
ZOLPIDEM TARTRATE 10 MG TABLET	46

28. On or about April 26, 2024, a Board inspector interviewed Respondent. During the interview, Respondent admitted to stealing from CVS Pharmacy and estimated that she took approximately seventy-five (75) tablets of Zolpidem Tartrate 10 mg.

**FIRST CAUSE FOR DISCIPLINE**

**(Unlawful Possession of a Controlled Substances and Dangerous Drugs  
Without a Prescription)**

29. Respondent is subject to disciplinary action under Code sections 4301, subdivisions (j) and (o), 4059, subdivision (a), and 4060 in conjunction with Health and Safety Code sections 11170 and 11171, in that Respondent unlawfully furnished controlled substances and dangerous drugs to herself when she diverted controlled substances and dangerous drugs without a prescription between April 30, 2023 through March 16, 2024. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 20 through 28, as though set forth fully herein.

**SECOND CAUSE FOR DISCIPLINE**

**(Unprofessional Conduct - Moral Turpitude, Dishonesty, Fraud, Deceit, or Corruption)**

30. Respondent is subject to disciplinary action under Code section 4301, subdivision (f), in that Respondent committed multiple acts involving moral turpitude, dishonesty, fraud, deceit, or corruption in that Respondent diverted controlled substances and dangerous drugs between April 30, 2023 through March 16, 2024. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 20 through 28, as though set forth fully herein.

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1 **THIRD CAUSE FOR DISCIPLINE**

2 **(Obtained Controlled Substances by Fraud, Deceit, Subterfuge, or**  
3 **Concealment of Material Fact)**

4 31. Respondent is subject to disciplinary action under Code section 4301, subdivisions (j)  
5 and (o), and Health and Safety Code section 11173, subdivision (a), in that Respondent obtained  
6 controlled substances by fraud, deceit, subterfuge, or concealment of material fact when she  
7 diverted controlled substances between April 30, 2023 through March 16, 2024. Complainant  
8 refers to, and by this reference incorporates, the allegations set forth above in paragraphs 20  
9 through 28, as though set forth fully herein.

10 **FOURTH CAUSE FOR DISCIPLINE**

11 **(Unprofessional Conduct - Violations of Controlled Substance Statutes)**

12 32. Respondent is subject to disciplinary action under Code section 4301, subdivision (j),  
13 in that Respondent violated statutes regulating controlled substances, including Health and Safety  
14 Code, section 11350, subdivision (a), possessing controlled substances when she diverted  
15 controlled substances between April 30, 2023 through March 16, 2024. Complainant refers to,  
16 and by this reference incorporates, the allegations set forth above in paragraphs 20 through 28, as  
17 though set forth fully herein.

18 **OTHER MATTERS**

19 33. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Technician  
20 License Number TCH 168261, issued to Stephanie Baez, then Stephanie Baez shall be prohibited  
21 from serving as a manager, administrator, owner, member, officer, director, associate, or partner  
22 of a licensee for five years or until Pharmacy Technician License Number TCH 168261 is  
23 reinstated if it is revoked.

24 **PRAYER**

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

27 1. Revoking or suspending Pharmacy Technician License Number TCH 168261, issued  
28 to Stephanie Baez;

1           2.     Prohibiting Stephanie Baez from serving as a manager, administrator, owner,  
2 member, officer, director, associate, or partner of a licensee for five years if Pharmacy Technician  
3 License Number TCH 168261 is placed on probation or until Pharmacy Technician License  
4 Number TCH 168261 is reinstated if Pharmacy Technician License Number TCH 168261 issued  
5 to Stephanie Baez is revoked;

6           3.     Ordering Stephanie Baez to pay the Board of Pharmacy the reasonable costs of the  
7 investigation and enforcement of this case, pursuant to Business and Professions Code section  
8 125.3; and, if placed on probation, the costs of probation monitoring; and,

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

10  
11  
12     DATED: 9/6/2024

Sodergren, Anne@DCA Digitally signed by  
Sodergren, Anne@DCA  
Date: 2024.09.06  
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ANNE SODERGREN  
Executive Officer  
Board of Pharmacy  
Department of Consumer Affairs  
State of California  
*Complainant*

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