

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

In the Matter of the Statement of Issues Against:

SANDRA LETICIA CONTRERAS SALAZAR, Respondent

Agency Case No. 7764

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 December 12, 2024.

It is so ORDERED on November 12, 2024.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By

A handwritten signature in black ink, appearing to read "Seung W. Oh". The signature is fluid and cursive, with the first name "Seung" and last name "Oh" clearly distinguishable.

Seung W. Oh, Pharm.D.
Board President

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

12 In the Matter of the Statement of Issues Against:
13 **SANDRA LETICIA CONTRERAS SALAZAR**
14
15 **Pharmacy Technician License Applicant**
16 **Respondent.**

Case No. 7764

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

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

20 **PARTIES**

21 1. Anne Sodergren (Complainant, Executive Officer of the Board of Pharmacy (Board),
22 brought this action solely in her official capacity and is represented in this matter by Rob Bonta,
23 Attorney General of the State of California, by Marie C. Bryant, Deputy Attorney General.

24 2. Respondent Sandra Leticia Contreras Salazar (Respondent) is representing herself in
25 this proceeding and has chosen not to exercise her right to be represented by counsel.

26 3. On or about June 26, 2023, Respondent filed an application with the Board to obtain a
27 Pharmacy Technician License. The Board denied the application on or about February 13, 2024.
28

1 **JURISDICTION**

2 4. Statement of Issues No. 7764 was filed before the Board and is currently pending
3 against Respondent. The Statement of Issues and all other statutorily required documents were
4 properly served on Respondent on March 29, 2024.

5 5. A copy of Statement of Issues No. 7764 is attached as exhibit A and incorporated
6 herein by reference.

7 **ADVISEMENT AND WAIVERS**

8 6. Respondent has carefully read and understands the charges and allegations in
9 Statement of Issues No. 7764. Respondent has also carefully read and understands the effects of
10 this Stipulated Settlement and Disciplinary Order.

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

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

20 **CULPABILITY**

21 9. Respondent admits the truth of each and every charge and allegation in Statement of
22 Issues No. 7764.

23 10. Respondent agrees that her Pharmacy Technician License is subject to denial and she
24 agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

25 **CONTINGENCY**

26 11. This stipulation shall be subject to approval by the Board of Pharmacy. Respondent
27 understands and agrees that counsel for Complainant and the staff of the Board of Pharmacy may
28 communicate directly with the Board regarding this stipulation and settlement, without notice to

1 or participation by Respondent. By signing the stipulation, Respondent understands and agrees
2 that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the
3 Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and
4 Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for
5 this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall
6 not be disqualified from further action by having considered this matter.

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

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

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

19 **DISCIPLINARY ORDER**

20 IT IS HEREBY ORDERED that the application submitted by Respondent Sandra Leticia
21 Contreras Salazar is granted. Upon satisfaction of all license criteria, a Pharmacy Technician
22 License shall be issued to Respondent and immediately revoked. The revocation is stayed and
23 Respondent is placed on probation four (4) years upon the following terms and conditions:

24 **1. Obey All Laws**

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

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

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

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

2. Report to the Board

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

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

3. Interview with the Board

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

1 **4. Cooperate with Board Staff**

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

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

9 During the period of probation, Respondent shall notify all present and prospective
10 employers of the decision in case number 7764 and the terms, conditions and restrictions imposed
11 on Respondent by the decision, as follows:

12 Within thirty (30) days of the effective date of this decision, and within ten (10) days of
13 undertaking any new employment, Respondent shall report to the Board in writing the name,
14 physical address, and mailing address of each of her employer(s), and the name(s) and telephone
15 number(s) of all of her direct supervisor(s), as well as any pharmacist(s)-in- charge, designated
16 representative(s)-in-charge, responsible manager, or other compliance supervisor(s) and the work
17 schedule, if known. Respondent shall also include the reason(s) for leaving the prior
18 employment. Respondent shall sign and return to the Board a written consent authorizing the
19 Board or its designee to communicate with all of Respondent's employer(s) and supervisor(s),
20 and authorizing those employer(s) or supervisor(s) to communicate with the Board or its
21 designee, concerning Respondent's work status, performance, and monitoring. Failure to comply
22 with the requirements or deadlines of this condition shall be considered a violation of probation.

23 Within thirty (30) days of the effective date of this decision, and within fifteen (15) days of
24 Respondent undertaking any new employment, Respondent shall cause (a) her direct supervisor,
25 (b) her pharmacist-in-charge, designated representative-in-charge, responsible manager, or other
26 compliance supervisor, and (c) the owner or owner representative of her employer, to report to the
27 Board in writing acknowledging that the listed individual(s) has/have read the decision in case
28 number 7764, and terms and conditions imposed thereby. If one person serves in more than one

1 role described in (a), (b), or (c), the acknowledgment shall so state. It shall be the Respondent's
2 responsibility to ensure that these acknowledgment(s) are timely submitted to the Board. In the
3 event of a change in the person(s) serving the role(s) described in (a), (b), or (c) during the term
4 of probation, Respondent shall cause the person(s) taking over the role(s) to report to the Board in
5 writing within fifteen (15) days of the change acknowledging that he or she has read the decision
6 in case number 7764, and the terms and conditions imposed thereby.

7 If Respondent works for or is employed by or through an employment service, Respondent
8 must notify the person(s) described in (a), (b), and (c) above at every entity licensed by the Board
9 of the decision in case number 7764, and the terms and conditions imposed thereby in advance of
10 Respondent commencing work at such licensed entity. A record of this notification must be
11 provided to the Board upon request.

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

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

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

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

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

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

3 **7. Probation Monitoring Costs**

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

8 **8. Status of License**

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

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

17 **9. License Surrender While on Probation/Suspension**

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

26 Upon acceptance of the surrender, Respondent shall relinquish her pocket and/or wall
27 license, including any indicia of licensure not previously provided to the Board within ten (10)
28 days of notification by the Board that the surrender is accepted if not already provided.

Respondent may not reapply for any license from the Board for three (3) years from the effective date of the surrender. Respondent 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.

10. Certification Prior to Resuming Work

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

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

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

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

11. Practice Requirement – Extension of Probation

Except during periods of suspension, Respondent shall, at all times while on probation, be employed as a Pharmacy Technician in California for a minimum of 80 hours per calendar month. Any month during which this minimum is not met shall extend the period of probation by one

1 month. During any such period of insufficient employment, Respondent must nonetheless
2 comply with all terms and conditions of probation, unless Respondent receives a waiver in
3 writing from the Board or its designee.

4 If Respondent does not practice as a Pharmacy Technician in California for the minimum
5 number of hours in any calendar month, for any reason (including vacation), Respondent shall
6 notify the Board in writing within ten (10) days of the conclusion of that calendar month. This
7 notification shall include at least: the date(s), location(s), and hours of last practice; the reason(s)
8 for the interruption or reduction in practice; and the anticipated date(s) on which Respondent will
9 resume practice at the required level. Respondent shall further notify the Board in writing within
10 ten (10) days following the next calendar month during which Respondent practices as a
11 Pharmacy Technician in California for the minimum of hours. Any failure to timely provide such
12 notification(s) shall be considered a violation of probation.

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

17 12. Violation of Probation

18 If Respondent has not complied with any term or condition of probation, the Board shall
19 have continuing jurisdiction over Respondent, and the Board shall provide notice to Respondent
20 that probation shall automatically be extended, until all terms and conditions have been satisfied
21 or the Board has taken other action as deemed appropriate to treat the failure to comply as a
22 violation of probation, to terminate probation, and to impose the penalty that was stayed. The
23 Board or its designee may post a notice of the extended probation period on its website.

24 If Respondent violates probation in any respect, the Board, after giving Respondent notice
25 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that
26 was stayed. If a petition to revoke probation or an accusation is filed against Respondent during
27 probation, or the preparation of an accusation or petition to revoke probation is requested from
28 the Office of the Attorney General, the Board shall have continuing jurisdiction and the period of

1 probation shall be automatically extended until the petition to revoke probation or accusation is
2 heard and decided.

3 **13. Completion of Probation**

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

6 **14. Drug and Alcohol Testing**

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

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

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

26 Prior to any vacation or other period of absence from the area where the approved testing
27 vendor provides services, Respondent shall seek and receive approval from the Board or its
28 designee to use an alternate testing vendor to ensure testing can occur. Upon approval,

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

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

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

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

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

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

17 **15. Notification of Departure**

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

22 **16. Abstain from Drugs and Alcohol**

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

1 substances, or their associated paraphernalia for which a legitimate prescription has not been
2 issued as a necessary part of treatment, or any physical proximity to persons using illicit
3 substances, shall be considered a violation of probation.

4 **17. Prescription Coordination and Monitoring of Prescription Use**

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

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

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

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

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

23 **18. Attend Substance Abuse Recovery Relapse Prevention and Support Groups**

24 Within thirty (30) days of the effective date of this decision, Respondent shall begin regular
25 attendance at a recognized and established substance abuse recovery support group in California
26 (e.g., Alcoholics Anonymous, Narcotics Anonymous, etc.) which has been approved by the Board
27 or its designee. Respondent must attend the number of group meetings per week or month
28 directed by the Board or its designee, which shall typically be at least one per week. Respondent

1 shall continue regular attendance and submit signed and dated documentation confirming
2 attendance with each quarterly report for the duration of probation. Failure to attend or submit
3 documentation thereof shall be considered a violation of probation.

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

8 **19. No Ownership or Management of Licensed Premises**

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

16
17 **ACCEPTANCE**

18 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
19 stipulation and the effect it will have on my Pharmacy Technician License. I enter into this
20 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
21 to be bound by the Decision and Order of the Board of Pharmacy.

22
23 DATED: _____

24 SANDRA LETICIA CONTRERAS SALAZAR
25 *Respondent*
26
27
28

1 shall continue regular attendance and submit signed and dated documentation confirming
2 attendance with each quarterly report for the duration of probation. Failure to attend or submit
3 documentation thereof shall be considered a violation of probation.

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5 meeting approved by the PRP shall be sufficient for satisfaction of this requirement. Any
6 deviation from participation requirements for the PRP-approved group shall be considered a
7 violation of probation.

8 **19. No Ownership or Management of Licensed Premises**

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

16
17 **ACCEPTANCE**

18 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
19 stipulation and the effect it will have on my Pharmacy Technician License. I enter into this
20 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
21 to be bound by the Decision and Order of the Board of Pharmacy.

22
23 DATED: 9/24/24

Sandra Contreras Salazar
SANDRA LETICIA CONTRERAS SALAZAR
Respondent

ENDORSEMENT

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

DATED: 9/26/2024

Respectfully submitted,

ROB BONTA
Attorney General of California
JOSHUA A. ROOM
Supervising Deputy Attorney General

Marie C. Bryant

MARIE C. BRYANT
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Statement of Issues No. 7764

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

12 In the Matter of the Statement of Issues Against:
13 **SANDRA LETICIA CONTRERAS SALAZAR**
14
15 **Pharmacy Technician License Applicant**
16 Respondent.

Case No. 7764

STATEMENT OF ISSUES

17
18 **PARTIES**

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

21 2. On or about June 26, 2023, the Board of Pharmacy, Department of Consumer Affairs
22 (Board) received an application for registration as a Pharmacy Technician from Sandra Leticia
23 Contreras Salazar (Respondent). On or about June 22, 2023, Respondent certified under penalty
24 of perjury to the truthfulness of all statements, answers, and representations in the application.
25 The Board denied the application on or about February 13, 2024.

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1 **JURISDICTION**

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

4 4. Section 118, subdivision (a) of the Code states:

5 The withdrawal of an application for a license after it has been filed with a
6 board in the department shall not, unless the board has consented in writing to such
7 withdrawal, deprive the board of its authority to institute or continue a proceeding
8 against the applicant for the denial of the license upon any ground provided by law or
9 to enter an order denying the license upon any such ground.

10 **STATUTORY PROVISIONS**

11 5. Section 480 of the Code states:

12 (a) Notwithstanding any other provision of this code, a board may deny a
13 license regulated by this code on the grounds that the applicant has been convicted of
14 a crime or has been subject to formal discipline only if either of the following
15 conditions are met:

16 (1) The applicant has been convicted of a crime within the preceding seven
17 years from the date of application that is substantially related to the qualifications,
18 functions, or duties of the business or profession for which the application is made,
19 regardless of whether the applicant was incarcerated for that crime, or the applicant
20 has been convicted of a crime that is substantially related to the qualifications,
21 functions, or duties of the business or profession for which the application is made
22 and for which the applicant is presently incarcerated or for which the applicant was
23 released from incarceration within the preceding seven years . . .

24 ...

25 **REGULATORY PROVISIONS**

26 6. California Code of Regulations, title 16, section 1812 provides:

27 (a) For purposes of denial, suspension, or revocation of a license pursuant to
28 Section 141, Division 1.5 (commencing with Section 475), or Section 4982, Section
4989.54, Section 4992.3, or Section 4999.90 of the Code, a crime, professional
misconduct, or act shall be considered to be substantially related to the qualifications,
functions or duties of a person holding a license under Chapters 13, 13.5, 14, and 16
of Division 2 of the Code if to a substantial degree it evidences present or potential
unfitness of a person holding a license to perform the functions authorized by the
license in a manner consistent with the public health, safety or welfare. For purposes
of this section, "license" shall mean license or registration.

(b) In making the substantial relationship determination required under
subsection (a) for a crime, the board shall consider all of the following criteria:

(1) The nature and gravity of the offense.

1 (2) The number of years that have elapsed since the date of the offense.

2 (3) The nature and duties of a marriage and family therapist, educational
3 psychologist, clinical social worker, or professional clinical counselor.

4 (c) For purposes of subsection (a), a substantially related crime, professional
5 misconduct, or act shall include, but is not limited to, the following:

6 (1) Any violation of Article 6, Chapter 1, Division 2 (commencing with section
7 650) of the Code.

8 (2) Any violation of the provisions of Chapter 13 (commencing with section
9 4980), Chapter 13.5 (commencing with section 4989.10), Chapter 13.7 (commencing
10 with section 4990), Chapter 14 (commencing with section 4991), or Chapter 16
11 (commencing with section 4999.10) of Division 2 of the Code.

12 **CAUSE FOR DENIAL OF APPLICATION**

13 **(Conviction of Substantially Related Crime)**

14 7. Respondent's application is subject to denial under section 480, subdivision (a), in
15 that Respondent was convicted of a crime substantially related to the duties, functions, and/or
16 qualifications of pharmacy technician within the seven years prior to the date of her application
17 for licensure by the Board. On or about July 19, 2022, in a criminal matter titled *The People of*
18 *the State of California v. Sandra Leticiacontr Salazar*, Alameda County Superior Court Case No.
19 21-CR-010885, Respondent pled no contest to and was convicted of a misdemeanor violation of
20 Vehicle Code section 23103/23103.5 (Alcohol-Involved Reckless Driving). Imposition of
21 sentence was suspended and Respondent was placed on probation for one year with terms and
22 conditions that included one day in county jail, a three-month DUI course, and fines and fees.
23 The circumstances underlying the conviction are that on or about April 7, 2021, at approximately
24 12:41 a.m., Respondent was stopped by the California Highway Patrol for speeding. While in
25 contact with Respondent, the officer noticed an open case of beer on the floorboard behind the
26 driver's seat and an open beer spilled on the floorboard of the front passenger seat. She was
27 displaying signs and symptoms of intoxication, and had the odor of an alcoholic beverage on her
28 breath and person, but denied drinking alcohol. Respondent failed to perform field sobriety tests
satisfactorily. At approximately 2:36 a.m., samples of Respondent's blood were obtained for a
chemical blood test. The results showed she had a blood alcohol concentration (BAC) of 0.18%.

PRAYER

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

1. Denying the application of Sandra Leticia Contreras Salazar for a Pharmacy Technician License; and
2. Taking such other and further action as is deemed necessary and proper.

DATED: 3/24/2024

Sodergren,
Anne@DCA

Digitally signed by
Sodergren, Anne@DCA
Date: 2024.03.24 17:09:44
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ANNE SODERGREN
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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