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

In the Matter of the Accusation Against: JOANNE G. ZOROLA 821 Legacy Drive San Marcos, CA 92069 Pharmacy Technician Registration No. TCH 34227 Respondent.	Case No. 2965 OAH No. L2006120315

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on June 20, 2007.

It is so ORDERED May 21, 2007.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

By William Powers
WILLIAM POWERS
Board President

EDMUND G. BROWN JR., Attorney General
of the State of California
LINDA SCHNEIDER,
Supervising Deputy Attorney General
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Attorneys for Complainant

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

In the Matter of the Accusation Against: JOANNE G. ZOROLA 821 Legacy Drive San Marcos, CA 92069 Pharmacy Technician Registration No. TCH 34227 Respondent.	Case No. 2965 OAH No. L2006120315 **STIPULATED SURRENDER OF LICENSE AND ORDER**

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

PARTIES

1. Virginia Herold (Complainant) is the current Executive Officer of the Board of Pharmacy, Department of Consumer Affairs, and at all times has acted in her official capacity. Patricia F. Harris, former Executive Officer of the Board of Pharmacy, filed this action

in her official capacity as the Executive Officer of the Board of Pharmacy on June 30, 2006. Complainant is represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Ron Espinoza, Deputy Attorney General.

2. Joanne G. Zorola is representing herself in this proceeding and has chosen not to exercise her right to be represented by counsel.

3. On or about August 15, 2000, the Board of Pharmacy issued Pharmacy Technician Registration No. TCH 34227 to Joanne G. Zorola (Respondent). The Pharmacy Technician Registration was in full force and effect at all times relevant to the charges brought in Accusation No. 2965 and expired on August 31, 2006.

JURISDICTION

4. Accusation No. 2965 was filed before the Board of Pharmacy (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on August 15, 2006. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 2965 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 2965. Respondent also has carefully read, and fully understands the effects of this Stipulated Surrender of License and Order.

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

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

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 2965, agrees that cause exists for discipline and hereby surrenders her Pharmacy Technician Registration No. TCH 34227 for the Board's formal acceptance.

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

RESERVATION

10. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Board of Pharmacy or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

COST RECOVERY

11. The parties understand and agree that the costs of investigation and enforcement of this case are waived unless and until Respondent seeks reinstatement of her Pharmacy Technician Registration, or applies for a new registration or license with the Board. The costs waived total $7,351.50 and consist of $3,055 in investigation costs and $4,296.50 in enforcement costs.

CONTINGENCY

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

matter.

13. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

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

ORDER

IT IS HEREBY ORDERED that Pharmacy Technician Registration No. TCH 34227 issued to Respondent Joanne G. Zorola is surrendered and accepted by the Board of Pharmacy.

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

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

3. Respondent shall cause to be delivered to the Board her Pharmacy Technician Registration wall certificate and pocket license on or before the effective date of the Decision and Order.

4. Respondent understands and agrees that she may not apply for licensure or petition for reinstatement for any license from the Board for three (3) years from the effective date of the Decision and Order.

5. Respondent understands and agrees that if she ever applies for licensure or petitions for reinstatement in the State of California, the Board shall treat it as a new application for licensure. Respondent must comply with all the laws, regulations and procedures for licensure in effect at the time the application or petition is filed, and all of the charges and allegations contained in Accusation No. 2965 shall be deemed to be true, correct and admitted by

Respondent when the Board determines whether to grant or deny the application or petition.

6. Should Respondent ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation No. 2965 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

7. Respondent shall pay the Board its costs of investigation and enforcement of the case in the amount of $7,351.50 prior to issuance of a new or reinstated license as to Respondent.

ACCEPTANCE

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

DATED: 03-30-07.

JOANNE G. ZOROLA
Respondent

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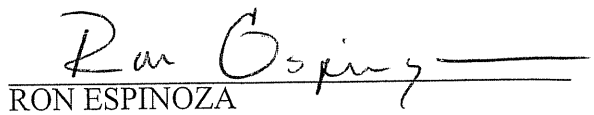
ENDORSEMENT

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

DATED: 4-2-07

EDMUND G. BROWN JR., Attorney General
of the State of California



RON ESPINOZA
Deputy Attorney General

Attorneys for Complainant

DOJ Matter ID: SD2006800099
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Exhibit A

Accusation No. 2965

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Attorneys for Complainant

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

In the Matter of the Accusation Against: JOANNE G. ZOROLA 191 E. Fallbrook St. #H Fallbrook, CA 92028 Pharmacy Technician No. TCH 34227 Respondent.	Case No. 2965 OAH No. **A C C U S A T I O N**

Complainant alleges:

PARTIES

1. Patricia F. Harris (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.

2. On or about August 15, 2000, the Board of Pharmacy issued Pharmacy Technician Registration Number TCH 34227 to Joanne G. Zorola (Respondent). The Pharmacy Technician Registration was in full force and effect at all times relevant to the charges brought herein and will expire on August 31, 2006, unless renewed.

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JURISDICTION

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

A. Section 4301 of the Code states:

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

". . . .

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

". . . .

"(j) The violation of any of the statutes of this state or of the United 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.

". . . ."

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

C. Section 4021 of the Code defines "controlled substance" as any substance listed in Chapter 2 (commencing with Section 11053) of Division 10 of the Health and Safety

Code.

D. Section 4022 of the Code defines "dangerous drugs" as any drug that is unsafe for self-medication and which by federal or state law can be lawfully dispensed only on prescription.

E. Section 4059 of the Code states, in relevant part:

"(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.

". . . ."

F. Section 4060 of the Code states:

"No person shall possess any controlled substance, except that furnished to a person upon the prescription of a physician, dentist, podiatrist, or veterinarian, or furnished pursuant to a drug order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse practitioner pursuant to Section 2836.1, or a physician assistant pursuant to Section 3502.1. This section shall not apply to the possession of any controlled substance by a manufacturer, wholesaler, pharmacy, physician, podiatrist, dentist, veterinarian, certified nurse-midwife, nurse practitioner, or physician assistant, when in stock in containers correctly labeled with the name and address of the supplier or producer.

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

G. Health and Safety Code section 11377 states, in relevant part:

"(a) Except as authorized by law and as otherwise provided in subdivision (b) or Section 11375, or in Article 7 (commencing with Section 4211) of Chapter 9 of Division 2 of the Business and Professions Code, every person who possesses any controlled substance which is (1) classified in Schedule III, IV, or V, and which is not a narcotic drug, (2) specified in subdivision (d) of Section 11054, except paragraphs (13), (14), (15), and (20) of subdivision (d),

(3) specified in paragraph (11) of subdivision (c) of Section 11056, (4) specified in paragraph (2) or (3) of subdivision (f) of Section 11054, or (5) specified in subdivision (d), (e), or (f) of Section 11055, unless upon the prescription of a physician, dentist, podiatrist, or veterinarian, licensed to practice in this state, shall be punished by imprisonment in a county jail for a period of not more than one year or in the state prison.

". . . ."

H. Health and Safety Code section 11350 states, in relevant part:

"(a) Except as otherwise provided in this division, every person who possesses (1) any controlled substance specified in subdivision (b) or (c), 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 the state prison.

". . . ."

I. Health and Safety Code section 11170 states:

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

DRUGS

4. The following are all dangerous drugs, pursuant to Business and Professions Code section 4022, unless otherwise indicated, and are also controlled substances if so identified:

A. Vicodin HP, a brand name for hydrocodone 10 mg with acetaminophen 660 mg, is a Schedule III controlled substance under Health and Safety Code section 11056, subdivision (e)(4).

B. Vicodin ES, a brand name for hydrocodone 7.5 mg with acetaminophen 750 mg, is a Schedule III controlled substance under Health and Safety Code section 11056, subdivision (e)(4).

C. Lortab, a brand name for hydrocodone 7.5 mg with acetaminophen 500 mg, is a Schedule III controlled substance under Health and Safety Code section 11056, subdivision (e)(4).

D. Vicodin, a brand name for hydrocodone 5 mg with acetaminophen 500 mg, is a Schedule III controlled substance under Health and Safety Code section 11056, subdivision (e)(4).

E. Tylenol with Codeine, a brand name for acetaminophen with codeine 60mg, is a Schedule III controlled substance under Health and Safety Code section 11056, subdivision (e)(2).

F. Xanax, a brand name for alprazolam, is a Schedule IV controlled substance under Health and Safety Code section 11057, subdivision (d)(1).

G. Valium, a brand name for diazepam, is a Schedule IV controlled substance under Health and Safety Code section 11057, subdivision (d)(9).

H. Ativan, a brand name for lorazepam, is a Schedule IV controlled substance under Health and Safety Code section 11057, subdivision (d)(16).

I. Restoril, a brand name for temazepam, is a Schedule IV controlled substance under Health and Safety Code section 11057, subdivision (d)(29).

J. Ambien, a brand name for zolpidem, is a Schedule IV controlled substance under Health and Safety Code section 11057, subdivision (d)(32).

K. Tenuate, a brand name for diethylpropion, is a Schedule IV controlled substance under Health and Safety Code section 11057, subdivision (f)(1).

L. Lonox, a brand name for diphenxylate with atropine, is a Schedule V controlled substance under Health and Safety Code section 11058, subdivision (c)(4).

M. Fioricet, a brand name for butalbital, acetaminophen and caffeine, is a dangerous drug under Business & Professions Code section 4022.

N. Imitrex, a brand name for sumatriptan, is a dangerous drug under Business & Professions Code section 4022.

O. Soma, a brand name for carisoprodol, is a dangerous drug under Business

& Professions Code section 4022.

P. Flexeril, a brand name for cyclobenzaprine, is a dangerous drug under Business & Professions Code section 4022.

Q. Effexor XR, a brand name for venlafaxine, is a dangerous drug under Business & Professions Code section 4022.

R. Remeron, a brand name for mirtazapine, is a dangerous drug under Business & Professions Code section 4022.

S. Vistaril, a brand name for hydroxyzine, is a dangerous drug under Business & Professions Code section 4022.

T. Donnatal, a brand name for atropine, phenobarbital, hyoscyamine and scopolamine, is a dangerous drug under Business & Professions Code section 4022.

U. Phenergan, a brand name for promethazine, is a dangerous drug under Business & Professions Code section 4022.

V. Allegra, a brand name for fexofenadine, is a dangerous drug under Business & Professions Code section 4022.

W. Zyrtec D, a brand name for cetirizine and pseudoephedrine, is a dangerous drug under Business & Professions Code section 4022.

X. Deltasone, a brand name for prednisone, is a dangerous drug under Business & Professions Code section 4022.

Y. Pyridium, a brand name for phenazopyridine, is a dangerous drug under Business & Professions Code section 4022.

Z. Cipro, a brand name for ciprofloxacin, is a dangerous drug under Business & Professions Code section 4022.

AA. Gas X, a brand name for simethicone, is an over-the-counter medication and is not a dangerous drug under Business and Professions Code section 4022.

BB. Chlor-Trimeton, a brand name for cholorpheniramine, is an over-the-counter medication and is not a dangerous drug under Business and Professions Code section 4022.

CC. Cheratussin AC, a brand name for guaifenesin and codeine, is a Schedule V controlled substance under Health and Safety Code section 11058, subdivision (c)(1).

FACTS AND CIRCUMSTANCES

5. On or about June 8, 2005, Respondent was working as a pharmacy technician for Rite Aid. On or about said date, Respondent was interviewed at work by a Rite Aid Loss Prevention Manager for possible involvement in stealing money from the store. During the interview, Respondent admitted that she had stolen approximately $1,000.00 in cash from store registers by marking down prescriptions and pocketing the amount of the markdown. Respondent also admitted that she had stolen approximately $100.00 in store merchandise. Respondent further admitted that she had stolen approximately $266.00 in dangerous and/or controlled drugs from the store and for which she had no legitimate prescription, including promethazine, cheratussin, hydrocodone, cyclobenzaprine, and acetaminophen/codeine.

6. Following her admissions, Respondent was placed on suspension from Rite Aid pending further investigation. Before leaving the store, Respondent agreed to empty the contents of her purse. Among the contents were two Rite Aid "gas relief" bottles. Respondent agreed to inspection of the bottles and approximately 67 tablets/capsules of controlled substances, 40 tablets/capsules of dangerous drugs, 23 tablets of over-the-counter drugs, and 5 unidentified tablets were found in the two bottles (see paragraph 4, subsection A-BB above, for the specific drugs found).

7. On July 19, 2005, a police report regarding the incident was filed with the Escondido Police Department.

FIRST CAUSE FOR DISCIPLINE

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

8. Respondent is subject to disciplinary action under Business and Professions Code section 4301, subdivision (f), for acts involving moral turpitude, dishonesty, fraud, deceit or corruption. The circumstances are as follows:

a. On or about June 8, 2005, Respondent admitted that while working as a pharmacy technician for Rite Aid she stole approximately $1,000.00 in cash from her employer

as more particularly alleged in paragraph 5 above and incorporated herein by reference.

b. On or about June 8, 2005, Respondent admitted that while working as a pharmacy technician for Rite Aid she stole approximately $100.00 in store merchandise from her employer as more particularly alleged in paragraph 5 above and incorporated herein by reference.

c. On or about June 8, 2005, Respondent admitted that while working as a pharmacy technician for Rite Aid she stole approximately $266.00 in dangerous and/or controlled drugs from her employer, including promethazine, cheratussin, hydrocodone, cyclobenzaprine, and acetaminophen/codeine, as more particularly alleged in paragraph 5 above and incorporated herein by reference.

SECOND CAUSE FOR DISCIPLINE

(Unprofessional Conduct- Unlawful Possession of Controlled Substance)

9. Respondent is subject to disciplinary action under Business and Professions Code section 4301, subdivision (o), in conjunction with Section 4060, for the unlawful possession of a controlled substance without a prescription. The circumstances are as follows:

a. On or about June 8, 2005, Respondent admitted that while working as a pharmacy technician for Rite Aid she stole and possessed controlled substances from her employer and for which she did not have a prescription, including cheratussin, hydrocodone, and acetaminophen/codeine, as more particularly alleged in paragraph 5 above and incorporated herein by reference.

b. On or about June 8, 2005, Respondent unlawfully possessed without a prescription approximately 67 tablets/capsules of controlled substances, including Vicodin HP, Vicodin ES, Vicodin, Lortab, Tylenol with Codeine, Xanax, Valium, Ativan, Restoril, Ambien, Tenuate, and Lonox, as more particularly alleged in paragraph 6 above and incorporated herein by reference.

THIRD CAUSE FOR DISCIPLINE

(Unprofessional Conduct- Furnishing Dangerous Drugs Without Prescription)

10. Respondent is subject to disciplinary action under Business and

Professions Code section 4301, subdivision (o), in conjunction with Section 4059, for the unlawful furnishing of dangerous drugs without a prescription. The circumstances are as follows:

a. On or about June 8, 2005, Respondent admitted that while working as a pharmacy technician for Rite Aid she stole and furnished herself with dangerous drugs from her employer and for which she did not have a prescription, including promethazine, cheratussin, hydrocodone, cyclobenzaprine, and acetaminophen/codeine, as more particularly alleged in paragraph 5 above and incorporated herein by reference.

b. On or about June 8, 2005, Respondent unlawfully furnished herself without a prescription approximately 40 tablets/capsules of dangerous drugs, including Fioricet, Imitrex, Soma, Flexeril, Effexor XR, Remeron, Vistaril, Donnatal, Phenergan, Allegra, Zyrtec D, Deltasone, Pyridium, and Cipro, as more particularly alleged in paragraph 6 above and incorporated herein by reference.

FOURTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct- Violation of Statute Regulating Controlled Substances)

11. Respondent is subject to disciplinary action under Business and Professions Code section 4301, subdivision (j), in conjunction with Health and Safety Code section 11350, subdivision (a), for the unlawful possession of a controlled substance without a prescription. The circumstances are as follows:

a. On or about June 8, 2005, Respondent admitted that while working as a pharmacy technician for Rite Aid she stole and possessed controlled substances from her employer and for which she did not have a prescription, including cheratussin, hydrocodone, and acetaminophen/codeine, as more particularly alleged in paragraph 5 above and incorporated herein by reference.

b. On or about June 8, 2005, Respondent unlawfully possessed without a prescription Vicodin HP, Vicodin ES, Vicodin, Lortab, and Tylenol with Codeine, as more particularly alleged in paragraph 6 above and incorporated herein by reference.

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FIFTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct- Violation of Statute Regulating Controlled Substances)

12. Respondent is subject to disciplinary action under Business and Professions Code section 4301, subdivision (j), in conjunction with Health and Safety Code section 11377, subdivision (a), for the unlawful possession of a non-narcotic controlled substance without a prescription. The circumstances are as follows:

a. On or about June 8, 2005, Respondent unlawfully possessed without a prescription Xanax, Valium, Ativan, Restoril, Ambien, Tenuate, and Lonox, as more particularly alleged in paragraph 6 above and incorporated herein by reference.

SIXTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct- Violation of Statute Regulating Controlled Substances)

13. Respondent is subject to disciplinary action under Business and Professions Code section 4301, subdivision (j), in conjunction with Health and Safety Code section 11170 for the unlawful furnishing to oneself a controlled substance. The circumstances are as follows:

a. On or about June 8, 2005, Respondent admitted that while working as a pharmacy technician for Rite Aid she stole and furnished herself with controlled substances from her employer, including cheratussin, hydrocodone, and acetaminophen/codeine, as more particularly alleged in paragraph 5 above and incorporated herein by reference.

b. On or about June 8, 2005, Respondent unlawfully furnished herself with approximately 67 tablets/capsules of controlled substances, including Vicodin HP, Vicodin ES, Vicodin, Lortab, Tylenol with Codeine, Xanax, Valium, Ativan, Restoril, Ambien, Tenuate, and Lonox, as more particularly alleged in paragraph 6 above and incorporated herein by reference.

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. Revoking or suspending Pharmacy Technician Number TCH 34227, issued to Joanne G. Zorola;

2. Ordering Joanne G. Zorola to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and

3. Taking such other and further action as deemed necessary and proper.

DATED: 6/30/06

P. F. Harris

PATRICIA F. HARRIS
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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DECLARATION OF SERVICE BY CERTIFIED MAIL AND FIRST CLASS MAIL
(Separate Mailings)

Case Name: **In the Matter of the Accusation Against: Joanne G. Zorola**

Case No.: **2965**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On July 19, 2006, I served the attached **Statement to Respondent, Accusation, Request for Discovery, Discovery Statutes, Notice of Defense (2) copies**, by placing a true copy thereof enclosed in a sealed envelope as certified mail with postage thereon fully prepaid and return receipt requested, and another true copy of the **Statement to Respondent, Accusation, Request for Discovery, Discovery Statutes, Notice of Defense (2) copies**, was enclosed in a second sealed envelope as first class mail with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 110 West A Street, Suite 1100, P.O. Box 85266, San Diego, CA 92186-5266, addressed as follows:

Joanne G. Zorola
191 E. Fallbrook St. #H
Fallbrook, CA 92028

Certified Article Number
7160 3901 9849 3221 2025
SENDERS RECORD

Respondent In Pro Per

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on July 19, 2006, at San Diego, California.

Rosita Donovan
Declarant

Signature

cc: Kim deLong, Enforcement Analyst, Board of Pharmacy

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