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NEVADA STATE BOARD OF PHARMACY

431 W Plumb Lane ~ Reno, NV 89509

PHARMACEUTICAL TECHNICIAN APPLICATION

Registration Fee: **\$40.00** - (non-refundable money order only, no cash)

OCT 23 2018

Complete Name (no abbreviations):

First: Tiffany Middle: Cherie Last: Hall, CPhT

Home Address: _____ Apt #: _____

City: Las Vegas State: NV Zip Code: 89117

Telephone: _____ Social Security Number: _____

Date of Birth: _____ Place of Birth: USA Sex: ☐ M or ☒ F

E-mail Address: _____

To qualify as a pharmaceutical technician you will need to meet one of the following criteria. Please check the appropriate box and include the required documentation.

☒ Copy of registration or on-line verification from state in which you are currently registered as a pharmaceutical technician.

☐ Copy of a certificate from an ASHP approved pharmacy technician school.

☐ Non ASHP approved school and PTCB or ICPT.

A licensee is not personally required to have a Nevada State Business License, however, if you have one, please provide the number: _____

1. Are you 18 years of age or older? Yes ☒ No ☐
 2. Are you a high school graduate or the equivalent? Yes ☒ No ☐

(IF YOU ANSWERED "NO" TO QUESTION 1 AND/OR 2, YOU CAN NOT SUBMIT THIS APPLICATION)

	Yes	No
Been diagnosed or treated for any mental illness, including alcohol or substance abuse, or Physical condition that would impair your ability to perform the essential functions of your license?.....	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Been charged, arrested or convicted of a felony or misdemeanor in <u>any</u> state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Been the subject of a board citation or an administrative action whether completed or pending in <u>any</u> state?.....	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Had your license subjected to any discipline for violation of pharmacy or drug laws in <u>any</u> state?.....	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you marked **YES** to any of the numbered questions (3-5) above, include the following information & provide an explanation & documentation:

Board Administrative Action:			State	Date:	Case #:
				/ /	
Criminal Action:	State	Date:	Case #:	County	Court
	NV, UT	12/24/2013, 01/29/2014, 03/01/2014, 03/22/2018	13CR020691C, 185400759	Carson, Wasatch	Carson City Justice and Municipal Court, Wasatch County Justice Court

In response to federally mandated requirements, the Nevada Legislature and Attorney General require that we include the following questions as part of all applications

- Are you the subject of a court order for the support of a child?..... Yes ☐ No ☒
 IF you marked **YES** to the question, above are you in compliance with the court order?..... Yes ☐ No ☐

I hereby certify that the information furnished on this document is true and correct. I agree to abide by all the statutes, rules and regulations governing pharmaceutical technicians and understand that a violation of any such statutes, rules and regulations may be grounds for suspension or revocation of this permit. I understand that Nevada law requires a licensed PT who, in their professional or occupational capacity, comes to know or has reasonable cause to believe, a child has been abused/neglected, to report the abuse/neglect to an agency which provides child welfare services or to a local law enforcement agency.

Tiffany C. Hall, CPhT
 Original Signature, no copies or stamps accepted

10/16/2018
 Date

Board Use Only: Date Processed: _____ Amount: _____

10/10/2018

S. Paul Edwards, Esq.
General Counsel
Nevada State Board of Pharmacy
431 W. Plumb Lane
Reno, Nevada 89509

Dear Mr. Edwards,

On March 22, 2018 at approximately 10:00 A.M., I was cited for a traffic violation in Heber City, Utah by a Utah Highway Patrol Officer. At approximately 11:00 A.M., Officer Call placed me under arrest for suspicion of driving under the influence of alcohol/drugs. I was detained in Wasatch County Jail in Heber City, Utah for the minimum 12 hour hold one is required to remain when one is arrested and charged for DUI in the State of Utah. The results of my forensic drug screen taken from the blood sample that I provided at the jail was used in my defense in court as evidence that I was not driving under the influence of alcohol/drugs. Prosecuting attorney McKay King could not provide evidence that I was driving impaired, and the case was dismissed by Judge Brook Sessions on September 19, 2018. I apologize to the Nevada State Board of Pharmacy for withholding this information when I applied for my Nevada Pharmacy Technician license on May 2, 2018.

Sincerely,

Tiffany C. Hall, CPhT

Tiffany C. Hall, CPhT

Case No: 185400759 Date: Sep 18, 2018

Due: \$200.00

Total Fine: \$200.00

Total Suspended: \$0

Total Surcharge: \$88.89

Total Fine Due: \$200.00

Defendant is to pay a fine of 200.00 which includes the surcharge. Interest may increase the final amount due.

Fine payments are to be made to The Court.

SENTENCE FINE PAYMENT NOTE

Posted bail offset fine. Refund balance to the person that posted bail.

End Of Order - Signature at the Top of the First Page

Shirley Hunting

From: David Wuest
Sent: Tuesday, October 30, 2018 1:47 PM
To: Tiffany C. Hall, CPhT
Cc: YenH Long; Paul Edwards; Shirley Hunting; Pharmacy Board; Kristopher Mangosing
Subject: Re: Full disclosure

Tiffany

Thank you for email.

I appreciate the issues you have experienced regarding abuse. As we discussed, we will provide you with the opportunity to explain your actions to the Board. You will receive written notice of your appearance at our next meeting in December.

Sincerely,

Dave

From: Tiffany C. Hall, CPhT
Sent: Tuesday, October 23, 2018 2:38:21 PM
To: David Wuest
Subject: Full disclosure

Dear Mr. Wuest,

I confess to lying under oath to the Nevada State Board of Pharmacy at my citation hearing on October 10, 2018. In addition to my Utah arrest history, I was subject to criminal action in Carson City, Nevada. I did not disclose this information because I was afraid of having my Nevada license suspended which would force me to have to move back to Utah where my abuser currently resides. I apologize for my dishonesty. I will do whatever is required to earn the Board's trust in me, and the privilege to work for the State of Nevada.

Sincerely,

...
Tiffany C. Hall, CPhT
Certified Pharmacy Technician
Walgreens Pharmacy

JUDGMENT AND ORDER OF THE COURT

CARSON CITY JUSTICE AND MUNICIPAL COURT

DEFENDANT: HALL, TIFFANY C

COURT CASE #: 13 CR 02069 1C

ORIGINATING CASE #: 13-7463

LANGUAGE SPOKEN: ENGLISH

STATUS: OPEN

PROSECUTING ATTORNEY: CARSON CITY DISTRICT ATTORNEY

DEFENSE ATTORNEY: WILLIAM MURPHY

CHARGE AND SENTENCE INFORMATION

CHARGES: 8.04.050 CS - RESIST PUBLIC OFFICER

PLEA: 04/16/2014 - GUILTY

DISPOSITION: 04/16/2014 - GUILTY

JAIL: SENTENCED TO 90 DAYS IN JAIL SUSPENDED FOR 1 YEAR

CHARGES: 199.280.3 - RESIST PUBLIC OFFICER

PLEA: NO PLEA

DISPOSITION: 12/26/2013 - NO CHARGES FILED

JAIL:

CHARGES: 10.20.010 CS - BASIC SPEEDING VIOLATION - 11-15 MILES PER HOUR OVER POSTED SPEED LIMIT

PLEA: NO PLEA

DISPOSITION: 12/26/2013 - NO CHARGES FILED

JAIL:

CHARGES: 10.25.060 CS - DRIVE WITH SUSPENDED OR REVOKED DRIVERS LICENSE

AMENDED TO: 10.25.050 CS DRIVE WITHOUT VALID DRIVERS LICENSE

PLEA: 04/16/2014 - GUILTY

DISPOSITION: 04/16/2014 - GUILTY

JAIL:

CHARGES: 10.25.040 CS - OPERATOR - PROOF OF INSURANCE REQUIRED

PLEA: 04/16/2014 - GUILTY

DISPOSITION: 04/16/2014 - GUILTY

JAIL:

CHARGES: 482.545.1 - OPERATE VEHICLE WITH EXPIRED REGISTRATION OR PLATES

PLEA: NO PLEA

DISPOSITION: 12/26/2013 - NO CHARGES FILED

JAIL:

CHARGES: 22.100 - CONTEMPT OF COURT

PLEA: NO PLEA

DISPOSITION: 04/16/2014 - DISMISSED

JAIL:

Exhibit 7

03/01/2014	03/05/2014	RELEASED OWN RECOGNIZANCE		
NEXT COURT HEARING INFORMATION NO FUTURE COURT DATE SCHEDULED AT THIS TIME				
ADDITIONAL CASE INFORMATION NO FURTHER INFORMATION				
JUDGE'S SIGNATURE: _____ JOHN TATRO, 4/16/2014				

DEFENDANT: HALL, TIFFANY C

Data Date: 4/16/2014

Print Date: 4/16/2014

COURT CASE #: 13 CR 02069 IC

FILE DATE: 12/24/2013

Page 3 of 3

3. On May 2, 2018, while her case was pending, Ms. Hall submitted to the Board a Pharmaceutical Technician Application. She did not disclose her arrest record on the application. She instead falsely marked “No” on question 3, which ask whether she had “[b]een charged, arrested or convicted of a felony or misdemeanor in any state?”

4. Ms. Hall signed the application certifying to the Board that the “information furnished on this document [the application] is true and complete.”

5. On or about August 8, 2018, Board Staff served a *Notice of Intended Action and Accusation* on Ms. Hall by certified United States mail, return receipt requested, using the address Ms. Hall most recently provided to the Board and which the Board had on file.

6. In September 2018, the Wasatch County Justice Court resolved the charges against Ms. Hall. She pled guilty to the speeding charge and the court, at the prosecution’s request, dismissed the other two charges.

7. Ms. Hall filed a belated *Answer to the Notice of Intended Action and Accusation* in the form of an email on or about October 2, 2018.

8. Additionally, based on evidence and testimony presented during the hearing, the Board finds that Board Staff satisfied the service requirements of NRS 639.242.

CONCLUSIONS OF LAW

Based on the forgoing findings of fact, the Board concludes as a matter of law:

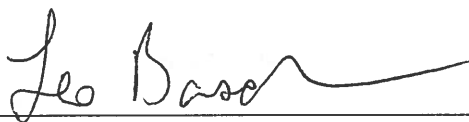
9. The Board has jurisdiction over this matter and Respondent Ms. Hall because at the time of the events alleged herein, Ms. Hall was a pharmaceutical technician registered by the Board.

10. NRS 639.281(a) states that “[a]ny person who secures or attempts to secure registration for himself or herself or any other person by making, or causing to be made, any false representation...is guilty of a misdemeanor.”

2018.10.16. ORDER.Hall

IT IS SO ORDERED.

Signed and effective this 18 day of October 2018.

A handwritten signature in cursive script, reading "Leo Basch", written in black ink. The signature is fluid and extends to the right with a long, sweeping tail.

Leo Basch, President
Nevada State Board of Pharmacy

FACTUAL ALLEGATIONS

IV.

Ms. Hall was arrested in Heber City, Utah on March 22, 2018, for driving under the influence of alcohol/drugs. Wasatch County Justice Court Case No. 185400759.

V.

Ms. Hall did not disclose her arrest record on the Pharmaceutical Technician application. She instead falsely marked “No” on question 3, which ask whether she had “*[b]een charged, arrested or convicted of a felony or misdemeanor in any state?*”

VI.

Ms. Hall then signed the application certifying to the Board that the “information furnished on this document [the application] is true and complete.”

FIRST CAUSE OF ACTION

VII.

“Any person who secures or attempts to secure registration for himself or herself or any other person by making, or causing to be made, any false representation...is guilty of a misdemeanor.” Nevada Revised Statute (NRS) 639.281(1). The statute goes on to state that: “Any certificate issued by the Board on information later found to be false or fraudulent must be automatically cancelled by the Board.” NRS 639.281(2).

By falsely marking “No” on question 3 on her application, which asks whether she had “*[b]een charged, arrested or convicted of a felony or misdemeanor in any state?*”, and by signing the application certifying that the information she provided was “true and correct”, Hall violated NRS 639.281(a) and engaged in unprofessional conduct, as defined in Nevada Administrative Code (NAC) 639.945(1)(h). Her actions are grounds for discipline pursuant to NRS 639.210(1), (4), (9), (10), (12), NRS 639.281(2) and NRS 639.255.

BEFORE THE NEVADA STATE BOARD OF PHARMACY

NEVADA STATE BOARD OF PHARMACY,)	CASE NO. 18-057-PT-S
)	
Petitioner,)	
v.)	
)	STATEMENT TO THE RESPONDENT
TIFFANY CHERIE HALL, PT)	NOTICE OF INTENDED ACTION
Certificate of Registration No. PT20933,)	AND ACCUSATION
)	RIGHT TO HEARING
Respondent.)	
	/	

TO THE RESPONDENT ABOVE-NAMED: PLEASE TAKE NOTICE THAT:

I.

Pursuant to the authority and jurisdiction conferred upon the Nevada State Board of Pharmacy (Board) by NRS 639.241 to NRS 639.2576, inclusive, and NRS chapter 233B, a Notice of Intended Action and Accusation has been filed with the Board by the Petitioner, Larry L. Pinson, Executive Secretary for the Board, alleging grounds for imposition of disciplinary action by the Board against you, as is more fully explained and set forth in the Notice of Intended Action and Accusation served herewith and hereby incorporated reference herein.

II.

You have the right to a hearing before the Board to answer the Notice of Intended Action and Accusation and present evidence and argument on all issues involved, either personally or through counsel. Should you desire a hearing, it is required that you complete two copies of the Answer and Notice of Defense documents served herewith and file said copies with the Board within twenty (20) days of receipt of this Statement and Notice, and of the Notice of Intended Action and Accusation served within.

III.

The Board has scheduled your hearing on this matter for Wednesday, October 10, 2018, at 9:00 a.m. or soon thereafter. The hearing will occur at the Hilton Garden Inn, 7830 S. Las Vegas Blvd., Las Vegas, Nevada.

BEFORE THE NEVADA STATE BOARD OF PHARMACY

NEVADA STATE BOARD OF PHARMACY,)	CASE NO. 18-057-PT-S
)	
Petitioner,)	
v.)	
)	
TIFFANY CHERIE HALL, PT)	ANSWER AND NOTICE
Certificate of Registration No. PT20933,)	OF DEFENSE
)	
Respondent.)	
	/	

Respondent above named, in answer to the Notice of Intended Action and Accusation filed in the above-entitled matter before the Nevada State Board of Pharmacy, declares:

1. That his objection to the Notice of Intended Action and Accusation as being incomplete or failing to state clearly the charges against him, is hereby interposed on the following grounds: (State specific objections or insert "none").

CERTIFICATE OF SERVICE

I certify that I am an employee of the Nevada State Board of Pharmacy, and that on this 24th day of October, 2018, I served a true and correct copy of the foregoing document by Certified U.S. Mail to the following:

Tiffany Cherie Hall

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Las Vegas, NV 89117


SHIRLEY HUNTING