

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

In the Matter of the Statement of Issues Against:

DONALD RAY WYATT, III, Respondent

Pharmacist Applicant

Agency Case No. 7762

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 January 16, 2025.

It is so ORDERED on December 17, 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 a large initial "S" and "O".

Seung W. Oh, Pharm.D.
Board President

1 ROB BONTA
Attorney General of California
2 KAREN R. DENVIR
Supervising Deputy Attorney General
3 MEGAN M. BRIGHT
Deputy Attorney General
4 State Bar No. 347794
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 210-7893
Facsimile: (916) 327-8643
7 E-mail: Megan.Bright@doj.ca.gov
Attorneys for Complainant

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

11
12 In the Matter of the Statement of Issues
Against:

13 **DONALD RAY WYATT, III**

14
15 **Registered Pharmacist License Applicant**

16 Respondent.

Case No. 7762

**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 by
24 Rob Bonta, Attorney General of the State of California, by Megan M. Bright, Deputy Attorney
25 General.

26 2. Respondent Donald Ray Wyatt, III (Respondent) is representing himself in this
27 proceeding and has chosen not to exercise his right to be represented by counsel.

28 ///

1 3. On or about September 15, 2023, Respondent filed an application dated September
2 11, 2023, with the Board to obtain a Registered Pharmacist License. The Board denied the
3 application on January 23, 2024.

4 **JURISDICTION**

5 4. Statement of Issues No. 7762 was filed before the Board and is currently pending
6 against Respondent. The Statement of Issues and all other statutorily required documents were
7 properly served on Respondent on August 23, 2024.

8 5. A copy of Statement of Issues No. 7762 is attached as exhibit A and incorporated
9 herein by reference.

10 **ADVISEMENT AND WAIVERS**

11 6. Respondent has carefully read and understands the charges and allegations in
12 Statement of Issues No. 7762. Respondent has also carefully read and understands the effects of
13 this Stipulated Settlement and Disciplinary Order.

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

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

23 **CULPABILITY**

24 9. Respondent admits the truth of each and every charge and allegation in Statement of
25 Issues No. 7762.

26 10. Respondent agrees that his application for a Registered Pharmacist License is subject
27 to denial and to be bound by the Board's probationary terms as set forth in the Disciplinary Order
28 below.

1 **CONTINGENCY**

2 11. This stipulation shall be subject to approval by the Board of Pharmacy. Respondent
3 understands and agrees that counsel for Complainant and the staff of the Board of Pharmacy may
4 communicate directly with the Board regarding this stipulation and settlement, without notice to
5 or participation by Respondent. By signing the stipulation, Respondent understands and agrees
6 that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the
7 Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and
8 Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for
9 this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall
10 not be disqualified from further action by having considered this matter.

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

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

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

23 **DISCIPLINARY ORDER**

24 IT IS HEREBY ORDERED upon satisfaction of all statutory and regulatory requirements
25 for issuance of Pharmacist License, a Pharmacist License shall be issued to Respondent and
26 immediately revoked; the order of revocation is stayed and Respondent is placed on probation for
27 five (5) years upon the following terms and conditions:

28 ///

1 **1. Precedent to Licensure**

2 As a condition precedent to issuance of his license, Respondent shall reimburse the board
3 for its costs of investigation and prosecution in the amount of \$10,413.00, from prior case entitled
4 *In the Matter of the Accusation Against: Donald Ray Wyatt III*, Case Number 5064. Said amount
5 shall be paid in full prior to the issuance of his license.

6 **2. Obey All Laws**

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

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

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

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

22 **3. Report to the Board**

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

27 Failure to submit timely reports in a form as directed shall be considered a violation of
28 probation. Any period(s) of delinquency in submission of reports as directed may be added to the

1 total period of probation. Moreover, if the final probation report is not made as directed,
2 probation shall be automatically extended until such time as the final report is made and accepted
3 by the board.

4 **4. Interview with the Board**

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

10 **5. Cooperate with Board Staff**

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

17 **6. Continuing Education**

18 Respondent shall provide evidence of efforts to maintain skill and knowledge as a
19 pharmacist as directed by the board or its designee.

20 **7. Reporting of Employment and Notice to Employers**

21 During the period of probation, respondent shall notify all present and prospective
22 employers of the decision in case number 7762 and the terms, conditions and restrictions imposed
23 on respondent by the decision, as follows:

24 Within thirty (30) days of the effective date of this decision, and within ten (10) days of
25 undertaking any new employment, respondent shall report to the board in writing the name,
26 physical address, and mailing address of each of his employer(s), and the name(s) and telephone
27 number(s) of all of his direct supervisor(s), as well as any pharmacist(s)-in-charge, designated
28 representative(s)-in-charge, responsible manager, or other compliance supervisor(s) and the work

1 schedule, if known. Respondent shall also include the reason(s) for leaving the prior
2 employment. Respondent shall sign and return to the board a written consent authorizing the
3 board or its designee to communicate with all of respondent's employer(s) and supervisor(s), and
4 authorizing those employer(s) or supervisor(s) to communicate with the board or its designee,
5 concerning respondent's work status, performance, and monitoring. Failure to comply with the
6 requirements or deadlines of this condition shall be considered a violation of probation.

7 Within thirty (30) days of the effective date of this decision, and within fifteen (15) days of
8 respondent undertaking any new employment, respondent shall cause (a) his direct supervisor, (b)
9 his pharmacist-in-charge, designated representative-in-charge, responsible manager, or other
10 compliance supervisor, and (c) the owner or owner representative of his employer, to report to the
11 board in writing acknowledging that the listed individual(s) has/have read the decision in case
12 number 7762, and terms and conditions imposed thereby. If one person serves in more than one
13 role described in (a), (b), or (c), the acknowledgment shall so state. It shall be the respondent's
14 responsibility to ensure that these acknowledgment(s) are timely submitted to the board. In the
15 event of a change in the person(s) serving the role(s) described in (a), (b), or (c) during the term
16 of probation, respondent shall cause the person(s) taking over the role(s) to report to the board in
17 writing within fifteen (15) days of the change acknowledging that he or she has read the decision
18 in case number 7762, and the terms and conditions imposed thereby.

19 If respondent works for or is employed by or through an employment service, respondent
20 must notify the person(s) described in (a), (b), and (c) above at every entity licensed by the board
21 of the decision in case number 7762, and the terms and conditions imposed thereby in advance of
22 respondent commencing work at such licensed entity. A record of this notification must be
23 provided to the board upon request.

24 Furthermore, within thirty (30) days of the effective date of this decision, and within fifteen
25 (15) days of respondent undertaking any new employment by or through an employment service,
26 respondent shall cause the person(s) described in (a), (b), and (c) above at the employment service
27 to report to the board in writing acknowledging that he or she has read the decision in case

28 ///

number, and the terms and conditions imposed thereby. It shall be respondent's responsibility to ensure that these acknowledgment(s) are timely submitted to the board.

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

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

8. Notification of Change(s) in Name, Address(es), or Phone Number(s)

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

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

9. Restrictions on Supervision and Oversight of Licensed Facilities

During the period of probation, respondent shall not supervise any intern pharmacist, be the pharmacist-in-charge, designated representative-in-charge, responsible manager or other compliance supervisor of any entity licensed by the board, nor serve as a consultant. Assumption of any such unauthorized supervision responsibilities shall be considered a violation of probation.

During the period of probation, respondent shall not supervise any ancillary personnel, including, but not limited to, pharmacy technicians, designated representatives, designated representative-3PL in any entity licensed by the board. Assumption of any such unauthorized ancillary personnel supervision responsibilities shall be considered a violation of probation.

10. Probation Monitoring Costs

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

1 **11. Status of License**

2 Respondent shall, at all times while on probation, maintain an active, current Registered
3 Pharmacist License with the board, including any period during which suspension or probation is
4 tolled. Failure to maintain an active, current Registered Pharmacist License shall be considered a
5 violation of probation.

6 If respondent's Registered Pharmacist License expires or is cancelled by operation of law or
7 otherwise at any time during the period of probation, including any extensions thereof due to
8 tolling or otherwise, upon renewal or reapplication respondent's license shall be subject to all
9 terms and conditions of this probation not previously satisfied.

10 **12. License Surrender While on Probation**

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

19 Upon acceptance of the surrender, respondent shall relinquish his pocket and/or wall
20 license, including any indicia of licensure not previously provided to the board within ten (10)
21 days of notification by the board that the surrender is accepted if not already provided.
22 Respondent may not reapply for any license from the board for three (3) years from the effective
23 date of the surrender. Respondent shall meet all requirements applicable to the license sought as
24 of the date the application for that license is submitted to the board, including any outstanding
25 costs.

26 **13. Practice Requirement – Extension of Probation**

27 Except during periods of suspension, respondent shall, at all times while on probation, be
28 employed as a pharmacist in California for a minimum of 100 hours per calendar month. Any

1 month during which this minimum is not met shall extend the period of probation by one month.
2 During any such period of insufficient employment, respondent must nonetheless comply with all
3 terms and conditions of probation, unless respondent receives a waiver in writing from the board
4 or its designee.

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

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

18 **14. Violation of Probation**

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

25 If respondent violates probation in any respect, the board, after giving respondent notice
26 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that
27 was stayed. If a petition to revoke probation or an accusation is filed against respondent during
28 probation, or the preparation of an accusation or petition to revoke probation is requested from

1 the Office of the Attorney General, the board shall have continuing jurisdiction and the period of
2 probation shall be automatically extended until the petition to revoke probation or accusation is
3 heard and decided.

4 **15. Completion of Probation**

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

7 **16. Pharmacists Recovery Program (PRP)**

8 By no later than ten (10) days after the effective date of this decision, respondent shall have
9 completed all of the following: contacted the Pharmacists Recovery Program (PRP) for
10 evaluation; enrolled in the PRP; completed, signed, and returned the treatment contract as well as
11 any addendums required or suggested by the PRP; successfully completed registration for any
12 drug or alcohol testing mandated by the treatment contract and/or by enrollment in the PRP; and
13 begun compliance with the drug or alcohol testing protocol(s). Respondent shall successfully
14 participate in the PRP and complete the treatment contract and any addendums required or
15 suggested by the PRP. The costs for PRP participation shall be borne by the respondent.

16 If respondent is currently enrolled in the PRP, said participation is now mandatory and as of
17 the effective date of this decision is no longer considered a self-referral under Business and
18 Professions Code section 4362 (a)(2). Respondent shall successfully participate in and complete
19 his or her current contract and any subsequent addendums with the PRP.

20 Respondent shall pay administrative fees as invoiced by the PRP or its designee. Fees not
21 timely paid to the PRP shall constitute a violation of probation. The board will collect unpaid
22 administrative fees as part of the annual probation monitoring costs if not submitted to the PRP.

23 Any of the following shall result in the automatic suspension of practice by respondent and
24 shall be considered a violation of probation:

25 Failure to contact, complete enrollment, and execute and return the treatment contract with
26 the PRP, including any addendum(s), within ten (10) days of the effective date of the decision as
27 directed by the PRP;

28 ///

1 Failure to complete registration for any drug or alcohol testing mandated by the treatment
2 contract and/or by the PRP, and begin compliance with the testing protocol(s), within ten (10)
3 days of the effective date of the decision as directed by the PRP;

4 Failure to comply with testing protocols regarding daily check-in and/or failure to complete
5 a mandated test as directed by the PRP;

6 Any report from the PRP of material non-compliance with the terms and conditions of the
7 treatment contract and/or any addendum(s); or

8 Termination by the PRP for non-compliance, failure to derive benefit, or as a public risk.

9 Respondent may not resume the practice of pharmacy until notified by the board in writing.

10 Probation shall be automatically extended until respondent successfully completes the PRP.
11 The board will provide notice of any such suspension or extension of probation.

12 During any suspension, respondent shall not enter any pharmacy area or any portion of the
13 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 as a pharmacist nor do any act involving drug
17 selection, selection of stock, manufacturing, compounding, dispensing or patient consultation; nor
18 shall respondent manage, administer, or be a consultant to any licensee of the board, or have
19 access to or control the ordering, distributing, manufacturing or dispensing of dangerous drugs
20 and/or dangerous devices or controlled substances.

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

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

27 ///

28 ///

1 **17. Drug and Alcohol Testing**

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

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

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

21 Prior to any vacation or other period of absence from the area where the approved testing
22 vendor provides services, respondent shall seek and receive approval from the board or its
23 designee to use an alternate testing vendor to ensure testing can occur. Upon approval,
24 respondent shall enroll and register with the approved alternate drug testing vendor, provide to
25 that alternate vendor any documentation required by the vendor, including any necessary payment
26 by respondent. During the period of absence of the area, respondent shall commence testing
27 protocols with the alternate vendor, including required daily contacts with the testing vendor to
28 determine if testing is required, and required testing. Any failure to timely seek or receive

1 approval from the board or its designee, or to timely enroll and register with, timely commence
2 testing protocols with, or timely undergo testing with, the alternate testing vendor, shall be
3 considered a violation of probation.

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

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

24 During any such suspension, respondent shall not enter any pharmacy area or any portion of
25 the licensed premises of a wholesaler, third-party-logistics provider, veterinary food-animal drug
26 retailer, or any other distributor of drugs which is licensed by the board, or any manufacturer, or
27 any area where dangerous drugs and/or dangerous devices or controlled substances are
28 maintained. Respondent shall not practice pharmacy nor do any act involving drug selection,

1 selection of stock, manufacturing, compounding, dispensing or patient consultation; nor shall
2 respondent manage, administer, or be a consultant to any licensee of the board, or have access to
3 or control the ordering, distributing, manufacturing or dispensing of dangerous drugs and/or
4 dangerous devices and controlled substances.

5 During any such suspension, respondent shall not engage in any activity that requires the
6 professional judgment of and/or licensure as a pharmacist. Respondent shall not direct or control
7 any aspect of the practice of pharmacy, or of the manufacturing, distributing, wholesaling, or
8 retailing of dangerous drugs and/or dangerous devices.

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

12 18. Notification of Departure

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

17 19. Abstain from Drugs and Alcohol

18 Respondent shall completely abstain from the possession or use of alcohol, controlled
19 substances, illicit drugs, dangerous drugs and/or dangerous devices, or their associated
20 paraphernalia, except when possessed or used pursuant to a legitimate prescription issued as a
21 necessary part of treatment. Respondent shall ensure that he is not in the same physical location
22 as individuals who are using illicit substances even if respondent is not personally ingesting the
23 drugs. Any possession or use of alcohol, dangerous drugs and/or dangerous devices or controlled
24 substances, or their associated paraphernalia for which a legitimate prescription has not been
25 issued as a necessary part of treatment, or any physical proximity to persons using illicit
26 substances, shall be considered a violation of probation.

27 ///

28 ///

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

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

23 If at any time an approved practitioner determines that respondent is unable to practice
24 safely or independently as a pharmacist, the practitioner shall notify the board or its designee
25 immediately by telephone and follow up by written letter within three (3) working days. Upon
26 notification from the board or its designee of this determination, respondent shall be
27 automatically suspended and shall not resume practice as a pharmacist until notified by the board
28 or its designee 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. Respondent shall not practice pharmacy nor do any act involving drug selection,
6 selection of stock, manufacturing, compounding, dispensing or patient consultation; nor shall
7 respondent manage, administer, or be a consultant to any licensee of the board, or have access to
8 or control the ordering, distributing, manufacturing or dispensing of dangerous drugs and/or
9 dangerous devices and controlled substances. Respondent shall not resume practice until notified
10 by the board.

11 During any suspension, respondent shall not engage in any activity that requires the
12 professional judgment and/or licensure as a pharmacist. Respondent shall not direct or control
13 any aspect of the practice of pharmacy or of the manufacturing, distributing, wholesaling, or
14 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 **21. Facilitated Group Recovery and/or Support Meetings**

18 Within thirty (30) days of the effective date of this decision, respondent shall begin regular
19 attendance at a group recovery and/or support meeting that is run by a trained facilitator approved
20 in advance by the board or its designee. The required frequency of group meeting attendance
21 shall be determined by the board or its designee. Respondent shall continue regular attendance as
22 directed at an approved facilitated group meeting until the board or its designee advises the
23 respondent in writing that he may cease regular attendance. Respondent shall provide signed and
24 dated documentation of attendance as required with each quarterly report. Failure to attend as
25 required or to submit documentation of attendance shall be considered a violation of probation.

26 If respondent is required to participate in the PRP, compliance with this term can be
27 demonstrated through that program. Where respondent is enrolled in the PRP, participation as
28 required in a facilitated group meeting approved by the PRP shall be sufficient for satisfaction of

1 this requirement. Any deviation from participation requirements for the PRP-approved group
2 shall be considered a violation of probation.

3 **22. Attend Substance Abuse Recovery Relapse Prevention and Support Groups**

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

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

16 **23. Ethics Course**

17 Within sixty (60) calendar days of the effective date of this decision, respondent shall enroll
18 in a course in ethics, at respondent's expense, approved in advance by the board or its designee
19 that complies with Title 16 California Code of Regulations section 1773.5. Respondent shall
20 provide proof of enrollment upon request. Within five (5) days of completion, respondent shall
21 submit a copy of the certificate of completion to the board or its designee. Failure to timely enroll
22 in an approved ethics course, to initiate the course during the first year of probation, to
23 successfully complete it before the end of the second year of probation, or to timely submit proof
24 of completion to the board or its designee, shall be considered a violation of probation.

25 **24. No Ownership or Management of Licensed Premises**

26 Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager,
27 administrator, member, officer, director, trustee, associate, or partner of any business, firm,
28 partnership, or corporation currently or hereinafter licensed by the board. Respondent shall sell

1 or transfer any legal or beneficial interest in any entity licensed by the board within ninety (90)
2 days following the effective date of this decision and shall immediately thereafter provide written
3 proof thereof to the board. Failure to timely divest any legal or beneficial interest(s) or provide
4 documentation thereof shall be considered a violation of probation.

5 **ACCEPTANCE**

6 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
7 stipulation and the effect it will have on my Registered Pharmacist License. I enter into this
8 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
9 to be bound by the Decision and Order of the Board of Pharmacy, .

10
11 DATED: _____

12 DONALD RAY WYATT, III
13 *Respondent*

14 **ENDORSEMENT**

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

17
18 DATED: _____

Respectfully submitted,

19 ROB BONTA
Attorney General of California
20 KAREN R. DENVIR
Supervising Deputy Attorney General

21
22 MEGAN M. BRIGHT
23 Deputy Attorney General
24 *Attorneys for Complainant*

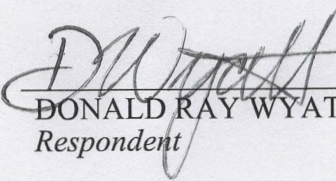
25
26 SA2024300880
27 38503001.docx
28

1 or transfer any legal or beneficial interest in any entity licensed by the board within ninety (90)
2 days following the effective date of this decision and shall immediately thereafter provide written
3 proof thereof to the board. Failure to timely divest any legal or beneficial interest(s) or provide
4 documentation thereof shall be considered a violation of probation.

5 **ACCEPTANCE**

6 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
7 stipulation and the effect it will have on my Registered Pharmacist License. I enter into this
8 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
9 to be bound by the Decision and Order of the Board of Pharmacy, .

10
11 DATED: 11-3-2024


DONALD RAY WYATT, III
Respondent

13
14 **ENDORSEMENT**

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

17 DATED: _____

Respectfully submitted,

18
19 ROB BONTA
Attorney General of California
20 KAREN R. DENVIR
Supervising Deputy Attorney General

21
22 MEGAN M. BRIGHT
23 Deputy Attorney General
Attorneys for Complainant
24
25

26 SA2024300880
27 38503001.docx
28

1 or transfer any legal or beneficial interest in any entity licensed by the board within ninety (90)
2 days following the effective date of this decision and shall immediately thereafter provide written
3 proof thereof to the board. Failure to timely divest any legal or beneficial interest(s) or provide
4 documentation thereof shall be considered a violation of probation.

5 **ACCEPTANCE**

6 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
7 stipulation and the effect it will have on my Registered Pharmacist License. I enter into this
8 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
9 to be bound by the Decision and Order of the Board of Pharmacy, .

10
11 DATED: _____

12 DONALD RAY WYATT, III
13 *Respondent*

14 **ENDORSEMENT**

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

17 DATED: 11/4/2024

18 Respectfully submitted,

19 ROB BONTA
20 Attorney General of California
21 KAREN R. DENVIR
22 ~~Supervising~~ Deputy Attorney General

23 *Megan Bright*

24 MEGAN M. BRIGHT
25 Deputy Attorney General
26 *Attorneys for Complainant*

27 SA2024300880
28 38503001.docx

Exhibit A

Statement of Issues No. 7762

1 ROB BONTA
Attorney General of California
2 KAREN R. DENVIR
Supervising Deputy Attorney General
3 MEGAN M. BRIGHT
Deputy Attorney General
4 State Bar No. 347794
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 210-7893
Facsimile: (916) 327-8643
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 Statement of Issues
Against:

Case No. 7762

13 **DONALD RAY WYATT, III**

STATEMENT OF ISSUES

14 **Pharmacist Examination for Licensure**
15 **Applicant**

16 Respondent.

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 (Board).

22 2. On or about September 15, 2023, the Board received an application for Pharmacist
23 Examination for Licensure from Donald Ray Wyatt, III (Respondent). On or about September
24 11, 2023, Donald Ray Wyatt III certified under penalty of perjury to the truthfulness of all
25 statements, answers, and representations in the application. The Board denied the application on
26 January 23, 2024.

27 ///

28 ///

1 **Prior Licensure**

2 3. On or about November 5, 2012, the Board issued Pharmacist License Number RPH
3 68413 to Respondent. The Pharmacist License was surrendered as part of a disciplinary
4 proceeding resulting in a Stipulation and Order in Board Case No. 5064, which became effective
5 September 8, 2015. The allegations in Accusation No. 5064 were admitted as true as part of the
6 Stipulation and Order.

7 **JURISDICTION**

8 4. This Statement of Issues is brought before the Board of Pharmacy (Board),
9 Department of Consumer Affairs, under the authority of the following laws. All section
10 references are to the Business and Professions Code (Code) unless otherwise indicated.

11 5. Section 4300 of the Code states, in part:

12 (c) The board may refuse a license to any applicant guilty of unprofessional
13 conduct.

14 ...

15 (e) The proceedings under this article shall be conducted in accordance with
16 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the
17 Government Code, and the board shall have all the powers granted therein. The
 action shall be final, except that the propriety of the action is subject to review by the
 superior court pursuant to Section 1094.5 of the Code of Civil Procedure.

18 6. Code section 4300.1 states:

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

24 7. Section 4307 states in pertinent part:

25 “(a) Any person who has been denied a license or whose license has been
26 revoked or is under suspension, or who has failed to renew his or her license while it
27 was under suspension, or who has been a manager, administrator, owner, member,
28 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,

1 director, associate, partner, or any other person with management or control had
2 knowledge of or knowingly participated in any conduct for which the license was
3 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:

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

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

8 **STATUTORY PROVISIONS**

9 8. Section 4301 of the Code states:

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

12 ...

13 (f) The commission of any act involving moral turpitude, dishonesty, fraud,
14 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.

15 ...

16 (h) The administering to oneself, of any controlled substance, or the use of any
17 dangerous drug or of alcoholic beverages to the extent or in a manner as to be
dangerous or injurious to oneself, to a person holding a license under this chapter, or
18 to any other person or to the public, or to the extent that the use impairs the ability of
the person to conduct with safety to the public the practice authorized by the license.

19 ...

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

22 ...

23 (o) Violating or attempting to violate, directly or indirectly, or assisting in or
24 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
25 regulatory agency.

26 ...

27 9. Health and Safety Code section 11350 states, in pertinent part, that no person shall
28 possess any controlled substance classified in Schedule III, IV, or V which is a narcotic drug,

1 unless upon the written prescription of a physician, dentist, podiatrist, or veterinarian licensed to
2 practice in this state.

3 10. Health and Safety Code section 11170 states, “[n]o person shall prescribe, administer,
4 or furnish a controlled substance for himself.”

5 11. Health and Safety Code section 11173 states, in pertinent part:

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

10 ...

11 (c) No person shall, for the purpose of obtaining controlled substances, falsely
12 assume the title of, or represent himself to be, a manufacturer, wholesaler,
13 pharmacist, physician, dentist, veterinarian, registered nurse, physician's assistant, or
14 other authorized person.

15 **DRUGS**

16 12. *Norco* is a narcotic combination of Acetaminophen and Hydrocodone and is a
17 Schedule II controlled substance pursuant to Health and Safety Code section 11055, subdivision
18 (b)(1)(I)(i), and is a dangerous drug pursuant to Code section 4022.

19 13. *Lorazepam*, also known as Ativan, is a Schedule IV controlled substance as defined
20 by Health and Safety Code section 11057, subdivision (d)(16), and is a dangerous drug pursuant
21 to Code section 4022.

22 14. *Clonazepam*, also known as Klonopin, is a Schedule IV controlled substance as
23 designated by Health and Safety Code section 11057, subdivision (d)(7), and is a dangerous drug
24 pursuant to Code section 4022.

25 **FIRST CAUSE FOR DENIAL OF APPLICATION**

26 **(Dishonest Acts)**

27 15. Respondent's application is subject to denial for unprofessional conduct pursuant to
28 Code section 4301, subdivision (f), in that he acted with moral turpitude, dishonesty, fraud, deceit
or corruption, when he created fictitious prescriptions for Hydrocodone and Acetaminophen, and
when he stole Hydrocodone and Acetaminophen, Lorazepam, and Clonazepam, as follows:

1 a. On or about August 15, 2008, while working as a Pharmacist Intern (Intern
2 License Number INT 21448) at Target Store #T-2096 located on Claribel Road in Riverbank,
3 California, Respondent created a fictitious prescription for Hydrocodone and Acetaminophen
4 10/325 mg. On or about September 25, 2008, October 9, 2008, November 13, 2008, November
5 18, 2008, January 2, 2009, and January 9, 2009, Respondent obtained approximately 1,440
6 dosage units of Hydrocodone and Acetaminophen 10/325 mg. through his forged prescription at
7 Target Store #T-313, located on Pacific Avenue in Stockton, California.

8 b. On or about November 19, 2012 and November 26, 2012, Respondent created
9 two fraudulent prescriptions for Hydrocodone and Acetaminophen 10/325 mg. and Ibuprofen 800
10 mg. by misrepresenting himself as a physician to phone in the prescriptions to Walgreens #11705
11 located on Floyd Avenue in Modesto, California. Respondent subsequently obtained sixty tablets
12 of Hydrocodone and Acetaminophen 10/325 mg. on November 19, 2012, sixty tablets of
13 Hydrocodone and Acetaminophen 10/325 mg. November 23, 2012, and thirty tablets of Ibuprofen
14 800 mg. on November 19, 2012, through the forged prescriptions from Walgreens #11705.
15 Respondent admitted that the prescriptions in November 2012 were fraudulent.

16 c. On or between December 2, 2012 and February 23, 2013, while working as a relief
17 pharmacist, Respondent stole Hydrocodone and Acetaminophen 10/325 mg, and/or Lorazepam,
18 and/or Clonazepam from six Target pharmacies he worked at. Respondent admitted that the
19 medications he stole and illegally possessed were used for self-medication.

20 **SECOND CAUSE FOR DENIAL OF APPLICATION**

21 **(Use of Dangerous Drug)**

22 16. Respondent's application is subject to denial for unprofessional conduct pursuant to
23 Code section 4301, subdivision (h), in that Respondent used a dangerous drug to the extent or in a
24 manner as to be dangerous or injurious to oneself, to a person holding a license under this chapter,
25 or to any other person or to the public. The circumstances are as follows:

26 a. On or about July 17, 2013, in the matter of *People v. Donald Ray Wyatt III*
27 (Super. Ct. Stanislaus Co. Case No. 1455611), Respondent was convicted on his plea of nolo
28 contendere of violating Health and Safety Code section 11350, subdivision (a) (unlawful

possession of controlled substance), a felony, and Vehicle Code section 23103.5¹ (reckless driving), a misdemeanor. The facts and circumstances are as follows:

b. On or about February 15, 2013, police officers with the Modesto Police Department were dispatched to a non-injury traffic collision involving a vehicle driven by Respondent that collided into a parked vehicle. The police officers found Respondent to be in possession of controlled substances, to wit, 77 Hydrocodone tablets inside an unlabeled prescription bottle, 36 loose Hydrocodone tablets, and a prescription bottle labeled with another person's information containing 58 Lorazepam tablets and 6 Clonazepam tablets. Upon questioning of Respondent, he stated that he was coming from his work as a pharmacist at Target in Atwater. He admitted that he did not know the person whose name was on the labeled prescription bottle. The officers observed objective signs of Respondent being under the influence, and Respondent was arrested for driving under the influence of drugs and possession of a controlled substance. Respondent submitted a blood sample and tested positive for Benzodiazepines and Opiates.

FOURTH CAUSE FOR DENIAL OF APPLICATION

(Violation of Statutes Regulating Controlled Substances)

17. Respondent is subject to disciplinary action for unprofessional conduct pursuant to Code section 4301, subdivision (j), Code section 4060, and Health and Safety Code section 11350, in that he violated statutes regulating controlled substances and dangerous drugs as follows:

a. On multiple occasions, Respondent possessed controlled substances (Acetaminophen and Hydrocodone, Lorazepam, and Clonazepam), without a prescription, as more fully set forth above in paragraph 15 and its subparts.

///

///

¹ Vehicle Code Section 23103.5 is a procedural statute wherein there is acceptance of a nolo contendere plea to violation of Vehicle Code Section 23103 (reckless driving), in satisfaction of, or as a substitute for, an original charge of violation of Vehicle Code Section 23152 (driving under the influence of alcohol and/or drugs).

1 b. On or about February 15, 2013, Respondent was found to be in unlawful
2 possession of controlled substances, (Hydrocodone, Lorazepam, and Clonazepam), as more fully
3 set forth above in paragraph 16 and its subparts.

4 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

5 **(Violation of Laws and Regulations Governing Pharmacy)**

6 18. Respondent's application is subject to denial for unprofessional conduct pursuant to
7 Code section 4301, subdivision (o); Health and Safety Code section 11170; and Health and Safety
8 Code section 11173, subdivisions (a) and (c), in that he violated the laws and regulations
9 governing pharmacy as follows:

10 a. Respondent prescribed, administered, or furnished a controlled substance for
11 himself. The facts and circumstances are more fully set forth above in paragraphs 15 and its
12 subparts.

13 b. Respondent obtained or attempted to obtain controlled substances, by fraud,
14 deceit, misrepresentation, or subterfuge. The facts and circumstances are more fully set forth
15 above in paragraphs 15 and its subparts.

16 c. Respondent, for the purpose of obtaining controlled substances, falsely assumed
17 the title of, or represented himself to be, a manufacturer, wholesaler, pharmacist, physician,
18 dentist, veterinarian, registered nurse, physician's assistant, or other authorized person. The facts
19 and circumstances are more fully set forth above in paragraphs 15 and its subparts.

20 **OTHER MATTERS**

21 19. Under section 4307, if Respondent Donald Ray Wyatt, III's application is granted,
22 and he satisfies the prerequisites for licensure, and ultimately is placed on probation, then
23 Respondent shall be prohibited from serving as a manager, administrator, owner, member, officer,
24 director, associate, or partner of a licensee for five years and if Respondent's application is
25 denied, then Respondent shall be prohibited from serving as a manager, administrator, owner,
26 member, officer, director, associate, or partner of a licensee until a future application for licensure
27 is granted.

28 ///

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 Donald Ray Wyatt, III for a Registered Pharmacist License;

2. Prohibiting Donald Ray Wyatt, III from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if his application for licensure is granted and he satisfies the prerequisites for licensure, and he is placed on probation or until a future application is granted if this application is denied;

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

DATED: 8/16/2024

Sodergren,
Anne@DCA

Digitally signed by Sodergren,
Anne@DCA
Date: 2024.08.16 10:52:10 -07'00'

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

SA2024300880
Wyatt SOL.docx