

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

In the Matter of the Accusation Against:

GEORGE G. H. WU,

Pharmacist License No. RPH 45158

Respondent

Agency Case No. 6999

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 at 5:00 p.m. on January 5, 2022.

It is so ORDERED on December 6, 2021.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

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

Seung W. Oh, Pharm.D.
Board President

1 ROB BONTA
Attorney General of California
2 NANCY A. KAISER
Supervising Deputy Attorney General
3 KEVIN J. RIGLEY
Deputy Attorney General
4 State Bar No. 131800
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6301
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Attorneys for Complainant
7

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

12 In the Matter of the Accusation Against:

Case No. 6999

13 **GEORGE G. H. WU**
14 1811 Alta Oaks Drive
Arcadia, CA 91006

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

15 Pharmacist License No. RPH 45158

16 Respondent.
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 Kevin J. Rigley, Deputy Attorney
25 General.

26 2. Respondent George G. H. Wu (Respondent) is represented in this proceeding by
27 attorney R. Darren Cornforth, Esq., whose address is 510 W 6th St, Suite 1210, Los Angeles, CA
28 90014-1313.

3. On or about March 30, 1992, the Board issued Pharmacist License No. RPH 45158 to George G. H. Wu (Respondent). The Pharmacist License was in full force and effect at all times relevant to the charges brought in Accusation No. 6999, and will expire on November 30, 2021, unless renewed.

JURISDICTION

4. Accusation No. 6999 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on July 12, 2021. Respondent timely filed his Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 6999 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 6999. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Order.

7. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in Accusation No. 6999; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his 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.

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

CULPABILITY

9. Respondent understands and agrees that the charges and allegations in Accusation No. 6999, if proven at a hearing, constitute cause for imposing discipline upon his Pharmacist License.

10. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the charges in the Accusation, and that Respondent hereby gives up his right to contest those charges.

11. Respondent understands that by signing this stipulation he enables the Board to issue an order accepting the surrender of his Pharmacist License without further process.

CONTINGENCY

12. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent or his counsel. By signing the stipulation, Respondent understands and agrees that he may not withdraw his 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 of License and 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 Portable Document Format (PDF) and facsimile copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

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

15. 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 Disciplinary Order:

ORDER

IT IS HEREBY ORDERED that Pharmacist License No. RPH 45158 issued to Respondent George G. H. Wu is surrendered and accepted by the Board.

1. The surrender of Respondent's Pharmacist License and the acceptance of the surrendered license by the Board shall constitute the 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. Respondent understands and acknowledges that for purposes of Business and Professions Code section 4307, this stipulated surrender is the same as a revocation.

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

3. Respondent shall cause to be delivered to the Board his pocket license and, if one was issued, his wall certificate on or before the effective date of the Decision and Order.

4. Respondent may not apply, reapply, or petition for any licensure or registration of the Board for three (3) years from the effective date of the Decision and Order.

5. If Respondent 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. 6999 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. Respondent stipulates that should he apply for any license from the board on or after the effective date of this decision, the investigation and prosecution costs in the amount of \$6,776.00 incurred by the board herein shall be paid to the board prior to issuance of the new license, pursuant to Business and Professions Code Section 125.3.

7. If Respondent should 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. 6999 shall be deemed

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1 to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any
2 other proceeding seeking to deny or restrict licensure.

3
4 **ACCEPTANCE**

5 I have carefully read the above Stipulated Surrender of License and Order, and have fully
6 discussed it with my attorney, R. Darren Cornforth. I understand the stipulation and the effect it
7 will have on my Pharmacist License. I enter into this Stipulated Surrender of License and Order
8 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
9 Board of Pharmacy.

10
11 DATED: _____
12 **GEORGE G. H. WU**
13 *Respondent*

14 I have read and fully discussed with Respondent George G. H. Wu the terms and conditions
15 and other matters contained in this Stipulated Surrender of License and Order. I approve its form
16 and content.

17
18 DATED: _____
19 **R. Darren Cornforth**
20 *Attorney for Respondent*

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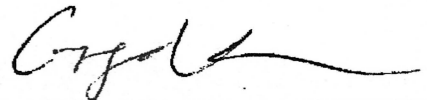
1 to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any
2 other proceeding seeking to deny or restrict licensure.

3
4 ACCEPTANCE

5 I have carefully read the above Stipulated Surrender of License and Order, and have fully
6 discussed it with my attorney, R. Darren Cornforth. I understand the stipulation and the effect it
7 will have on my Pharmacist License. I enter into this Stipulated Surrender of License and Order
8 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
9 Board of Pharmacy.

10
11 DATED:

9/15/2021

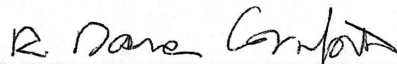


12 GEORGE G. H. WU
13 Respondent

14 I have read and fully discussed with Respondent George G. H. Wu the terms and conditions
15 and other matters contained in this Stipulated Surrender of License and Order. I approve its form
16 and content.

17
18 DATED:

9-15-21



19 R. Darren Cornforth
20 Attorney for 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.

DATED: _____

Respectfully submitted,

ROB BONTA
Attorney General of California
NANCY A. KAISER
Supervising Deputy Attorney General

KEVIN J. RIGLEY
Deputy Attorney General
Attorneys for Complainant

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ENDORSEMENT

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

DATED: October 16, 2021

Respectfully submitted,

ROB BONTA
Attorney General of California
NANCY A. KAISER
Supervising Deputy Attorney General



KEVIN J. RIGLEY
Deputy Attorney General
Attorneys for Complainant

LA2020601735
64504635.docx

Exhibit A

Accusation No. 6999

1 ROB BONTA
Attorney General of California
2 SHAWN P. COOK
Supervising Deputy Attorney General
3 KEVIN J. RIGLEY
State Bar No. 131800
4 300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
5 Telephone: (213) 269-6301
Facsimile: (916) 731-2126
6 *Attorneys for Complainant*

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8 **BEFORE THE**
9 **BOARD OF PHARMACY**
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Case No. 6999

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14 **1811 Alta Oaks Drive**
Arcadia, CA 91006

ACCUSATION

15 **Pharmacist License No. RPH 45158**

16 Respondent.

17
18 **PARTIES**

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

21 2. On or about March 30, 1992, the Board issued Pharmacist License Number RPH
22 45158 to George G. H. Wu (Respondent). The Pharmacist License was in full force and effect at
23 all times relevant to the charges brought herein and will expire on November 30, 2021, unless
24 renewed.

25 **JURISDICTION AND STATUTORY PROVISIONS**

26 3. This Accusation is brought before the Board under the authority of the following
27 laws. All section references are to the Business and Professions Code unless otherwise indicated.

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1 4. Section 4300 states, in pertinent part:

2 (a) Every license issued may be suspended or revoked.

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4 5. Section 118, subdivision (b), provides that the suspension, expiration, surrender, or
5 cancellation of a license shall not deprive the Board, Registrar, or Director of jurisdiction to
6 proceed with a disciplinary action during the period within which the license may be renewed,
7 restored, reissued, or reinstated.

8 6. Section 4300.1 states:

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

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

17 8. Section 4059 provides, in pertinent part:

18 (a) A person may not furnish any dangerous drug, except upon the prescription of a
19 physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section
20 3640.7. A person may not furnish any dangerous device, except upon the prescription of a
21 physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section
22 3640.7 .

23 9. Section 4113 provides, in pertinent part:

24

25 (c) The pharmacist-in-charge shall be responsible for a pharmacy's compliance with all
26 state and federal laws and regulations pertaining to the practice of pharmacy.

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10. Section 4301 states:

The board shall take action against any holder of a license who is guilty of unprofessional conduct or whose license has been 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, of any other 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 or by any other state or federal regulatory agency.

(p) Actions or conduct that would have warranted denial of a license.

11. Section 4307 states:

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

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

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

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

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

16 **REGULATORY PROVISIONS**

17 12. California Code of Regulations, title 16, section 1714, subdivision (d) states:

18 Each pharmacist while on duty shall be responsible for the security of the prescription
19 department, including provisions for effective control against theft or diversion of dangerous
20 drugs and devices, and records for such drugs and devices. Possession of a key to the pharmacy
21 where dangerous drugs and controlled substances are stored shall be restricted to a pharmacist.

22 13. California Code of Regulations, title 16, section 1718, states:

23 "Current Inventory" as used in Sections 4081 and 4332 of the Business and Professions
24 Code shall be considered to include complete accountability for all dangerous drugs handled by
25 every licensee enumerated in Sections 4081 and 4332.

26 The controlled substances inventories required by Title 21, CFR, section 1304 shall be
27 available for inspection upon request for at least 3 years after the date of the inventory.

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14. California Code of Regulations, title 16, section 1770, states:

For the purposes of denial, suspension, or revocation of a personal or facility license pursuant to Division 1.5 (commencing with Section 475) of the Business and Professions Code, a crime or act shall be considered substantially related to the qualifications, functions, or duties of a licensee or registrant to perform the functions authorized by his license or registration in a manner consistent with the public health, safety, or welfare.

15. California Code of Regulations, title 16, section 4113, subdivision (c) states:

The pharmacist-in-charge shall be responsible for a pharmacy's compliance with all state and federal laws and regulations pertaining to the practice of pharmacy.

CONTROLLED SUBSTANCES / DANGEROUS DRUGS

16. Section 4021 states:

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

17. “Chlordiazepoxide” is a sedative and hypnotic medication of the benzodiazepine class and is a Schedule IV controlled substance as designated by Health and Safety Code section 11057, subdivision (d)(1) and is categorized as a dangerous drug pursuant to section 4022, subdivision (c).

18. “Alprazolam” is an anti-anxiety benzodiazepine and is a Schedule IV controlled substance as designated by Health and Safety Code section 11057, subdivision (d)(1), and is categorized as a dangerous drug pursuant to section 4022, subdivision (c).

19. “Lorazepam” is an anti-anxiety benzodiazepine and is a Schedule IV controlled substance as designated by Health and Safety Code section 11057, subdivision (d)(1), and is categorized as a dangerous drug pursuant to section 4022, subdivision (c).

20. “Hydrocodone” is an opioid painkiller and is a Schedule II controlled substance as defined in Health and Safety Code section 11055, subdivision (d)(1), and is categorized as a dangerous drug pursuant to section 4022.

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21. "Acetaminophen with Codeine" is a pain reliever and is a Schedule III controlled substance as defined in Health and Safety Code section 11055, subdivision (e)(1), and is categorized as a dangerous drug pursuant to section 4022.

COST RECOVERY

22. Section 125.3 states, in pertinent part, that the Board may request the administrative law judge to direct a licensee 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.

BOARD INVESTIGATION REPORT DATED APRIL 21, 2020

23. Respondent was employed as Pharmacist-in-Charge (PIC) at Rite Aid #5528, located at 1335 E. Huntington Drive, Duarte, California 91010 (Rite Aid) from October 1, 1998 until January 31, 2020, when he was terminated from his employment at Rite Aid after he admitted stealing dangerous drugs and other store merchandise from his employer, Rite Aid.

24. Prior to Respondent's termination of employment from Rite Aid as referenced above, on December 23, 2019, the Store Leader (SL) at Rite Aid had reported that a supervisor at Rite Aid had observed suspicious activity occurring at the store. This supervisor had observed Respondent remove a box from the pharmacy area, then leave the store and walk straight to his car with the box without showing its contents to any other store associate. Thereafter, Rite Aid's Asset Protection (AP) department installed security cameras from December 24, 2019 to January 22, 2020, which recorded Respondent removing front-end merchandise in the store by concealing the items inside his plastic lunch bag, and then immediately leaving the store.

25. On or about January 27, 2020, an AP employee interviewed Respondent regarding his conduct that had been video recorded by the store, at which time Respondent admitted to stealing the merchandise items as referenced above. Respondent further admitted that he had been stealing items from the Rite Aid store for approximately the past five years. Respondent also completed and signed a written Admission Statement to that effect at that time, wherein Respondent admitted that he had stolen merchandise from Rite Aid, including dangerous drugs, and that he had furnished the stolen dangerous drugs to third parties. Respondent estimated he

1 had stolen front store merchandise totaling \$813.00, and dangerous drugs totaling \$4,683.00 from
2 his employer, Rite Aid.

3 26. Related to Respondent's termination, Rite Aid conducted an audit for the period April
4 28, 2019 through January 28, 2020. On or about March 6, 2020, the Board received notification
5 from Rite Aid via an amended DEA form 106 reporting the following losses by theft:

Drug Name	NDC Number	Total Loss
Chlordiazepoxide	00555015902	50
Chlordiazepoxide	00555015802	50
Alprazolam	00378400505	143
Lorazepam	00591024110	83
Temazepam	67877014601	100
Hydrocodone/Acetaminophen 5/325 mg	31722094101	24
Acetaminophen w/Codeine 300/30 mg	65162003310	100

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14 27. Accordingly, the above referenced Rite Aid audit for controlled substances
15 determined that from April 28, 2019 through January 28, 2020, while Respondent was the PIC at
16 Rite Aid, there were discrepancies for 50 capsules of chlordiazepoxide 5mg, 50 capsules of
17 chlordiazepoxide 25 mg, 143 tablets of alprazolam 1mg, 83 tablets of lorazepam 1mg, 24 tablets
18 of hydrocodone/acetaminophen 5-325 mg, and 100 tablets of Acetaminophen with Codeine.
19 Accordingly, Respondent had failed to keep accountability for the controlled substances at Rite
20 Aid in furtherance of his responsibilities as PIC.

21 28. On or about April 28, 2020, the Board Inspector investigating this matter received an
22 email from Respondent. Attached to that same email sent by Respondent was an Application for
23 Retired Pharmacist License, which was signed and dated by Respondent on March 28, 2020.

FIRST CAUSE FOR DISCIPLINE

(Acts Involving Moral Turpitude, Dishonesty, Fraud, or Deceit)

25 29. Respondent is subject to disciplinary action under section 4301, subdivisions (f), and
26 (o), in conjunction with California Code of Regulations, title 16, section 1770, on the grounds of
27 unprofessional conduct, in that Respondent committed acts involving moral turpitude, dishonesty,
28

1 fraud, or deceit. Complainant hereby incorporates the allegations set forth above in paragraphs
2 23-25 above, as though fully set forth herein.

3 **SECOND CAUSE FOR DISCIPLINE**

4 **(Operational Standards and Security and Current Inventory)**

5 30. Respondent is subject to disciplinary action under section 4113, section (c), in
6 conjunction with California Code of Regulations, title 16, sections 1714, subdivision (d), and
7 1718, in that Respondent failed to adhere to the responsibility for the security of the prescription
8 department, including provisions for effective control against theft or diversion of dangerous
9 drugs and devices. Specifically, an audit conducted by Rite Aid for the period April 28, 2019
10 through January 28, 2020 showed discrepancies for numerous controlled substances while
11 Respondent was serving as PIC. Complainant hereby further incorporates the allegations set forth
12 above in paragraphs 26-27 above, as though fully set forth herein.

13 **THIRD CAUSE FOR DISCIPLINE**

14 **(Furnishing Dangerous Drugs Prohibited without Prescription)**

15 31. Respondent is subject to disciplinary action under sections 4059, subdivision (a) and
16 4301, subdivision (f), in that he admitted to stealing dangerous drugs (non-controlled substances)
17 from him employer, and furnishing those dangerous drugs to third parties without a prescription.
18 Complainant hereby further incorporates the allegations set forth above in paragraphs 23-25
19 above, as though fully set forth herein.

20 **FOURTH CAUSE FOR DISCIPLINE**

21 **(Unprofessional Conduct Based on Acts that Would Warrant Denial of License)**

22 32. Respondent is subject to disciplinary action under sections 4300, and 4301,
23 subdivision (p), for engaging in unprofessional conduct which would have warranted denial of a
24 pharmacist license. Complainant hereby incorporates the allegations set forth above in
25 paragraphs 23-25 above, as though fully set forth herein.

26 **PRAYER**

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

- 1 1. Revoking or suspending Pharmacist License Number RPH 45158, issued to George
2 G. H. Wu;
3 2. Ordering George G. H. Wu to pay the Board of Pharmacy the reasonable costs of the
4 investigation and enforcement of this case, pursuant to Business and Professions Code section
5 125.3; and
6 3. Taking such other and further action as deemed necessary and proper.
7

8 DATED: 7/1/2021

Signature on File

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

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