

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

**In the Matter of the Accusation Against:**

**COUNTY OF KERN, CALIFORNIA, dba  
KERN MEDICAL CENTER CAMPUS PHARMACY,  
Hospital Pharmacy License No. PHE 54462;**

**and**

**ALISIA LIRA CARABANTES,  
Pharmacy Technician Registration No. TCH 28141;**

**and**

**SANJIT SINGH DHILLON,  
Pharmacist License No. RPH 58780,**

**Respondents**

**Agency Case No. 7026**

**OAH No. 2021040550**

## DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order for Public Repeval 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 March 9, 2022.

It is so ORDERED on February 7, 2022.

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 written in a cursive style with a large initial "S" and "O".

Seung W. Oh, Pharm.D.  
Board President

1 ROB BONTA  
Attorney General of California  
2 SHAWN P. COOK  
Supervising Deputy Attorney General  
3 MARIO CUAHUTLE  
Deputy Attorney General  
4 State Bar No. 305067  
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E-mail: Mario.Cuahutle@doj.ca.gov  
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 Accusation Against:

13 **COUNTY OF KERN, CALIFORNIA, DBA**  
14 **KERN MEDICAL CENTER CAMPUS**  
15 **PHARMACY**  
16 **2014 College Ave.**  
**Bakersfield, CA 93305**  
**Hospital Pharmacy License No. PHE 54462,**

17 **ALICIA LIRA CARABANTES**  
18 **620 Voorhies Lane**  
**Bakersfield, CA 93306**  
19 **Pharmacy Technician Registration No. TCH**  
**28141,**

20 **and**

21 **SANJIT SINGH DHILLON**  
22 **15732 San Marco Pl.**  
**Bakersfield, CA 93314**  
23 **Pharmacist License No. RPH 58780**

24 Respondents.

Case No. 7026

OAH No. 2021040550

**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER FOR PUBLIC**  
**REPROVAL AS TO COUNTY OF KERN,**  
**CALIFORNIA, DBA KERN MEDICAL**  
**CENTER CAMPUS PHARMACY ONLY**

[Bus. & Prof. Code § 495]

25  
26 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
27 entitled proceedings that the following matters are true:

28 ///

1 **PARTIES**

2 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy  
3 (Board). She brought this action solely in her official capacity and is represented in this matter by  
4 Rob Bonta, Attorney General of the State of California, by Mario Cuahutle, Deputy Attorney  
5 General.

6 2. Respondent County of Kern, California, dba Kern Medical Center Campus Pharmacy  
7 (Respondent) is represented in this proceeding by attorney Mark Connelly, whose address is:  
8 1319 Marsh Street, 2nd Floor  
9 San Luis Obispo, CA 93401-3315.

10 **JURISDICTION**

11 3. On or about July 1, 2016, the Board of Pharmacy issued Original Permit Number  
12 PHE 54462 to Respondent. The Original Permit Number was in full force and effect at all times  
13 relevant to the charges brought herein and will expire on November 1, 2021, unless renewed.

14 4. Accusation No. 7026 was filed before the Board, Department of Consumer Affairs  
15 and is currently pending against Respondent. The Accusation and all other statutorily required  
16 documents were properly served on Respondent on February 2, 2021. Respondent timely filed its  
17 Notice of Defense contesting the Accusation. A copy of Accusation No. 7026 is attached as  
18 exhibit A and incorporated herein by reference.

19 **ADVISEMENT AND WAIVERS**

20 5. Respondent has carefully read, fully discussed with counsel, and understands the  
21 charges and allegations in Accusation No. 7026. Respondent has also carefully read, fully  
22 discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary  
23 Order for Public Repeval.

24 6. Respondent is fully aware of its legal rights in this matter, including the right to a  
25 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at  
26 its own expense; the right to confront and cross-examine the witnesses against them; the right to  
27 present evidence and to testify on its own behalf; the right to the issuance of subpoenas to compel  
28 the attendance of witnesses and the production of documents; the right to reconsideration and

1 court review of an adverse decision; and all other rights accorded by the California  
2 Administrative Procedure Act and other applicable laws.

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

5 **CULPABILITY**

6 8. Respondent understands and agrees that the charges and allegations in Accusation  
7 No. 7026, if proven at a hearing, constitute cause for imposing discipline upon its Hospital  
8 Pharmacy License

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

13 10. Respondent agrees that its Hospital Pharmacy License is subject to discipline and  
14 they agree to be bound by the Disciplinary Order below.

15 **RESERVATION**

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

19 **CONTINGENCY**

20 12. This stipulation shall be subject to approval by the Board of Pharmacy. Respondent  
21 understands and agrees that counsel for Complainant and the staff of the Board of Pharmacy may  
22 communicate directly with the Board regarding this stipulation and settlement, without notice to  
23 or participation by Respondent or its counsel. By signing the stipulation, Respondent understands  
24 and agrees that they may not withdraw its agreement or seek to rescind the stipulation prior to the  
25 time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its  
26 Decision and Order, the Stipulated Settlement and Disciplinary Order for Public Repeval shall  
27 be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action  
28

1 between the parties, and the Board shall not be disqualified from further action by having  
2 considered this matter.

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

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

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

16 **DISCIPLINARY ORDER**

17 IT IS HEREBY ORDERED that Original Permit Number PHE 54462 issued to Respondent  
18 County of Kern, California, dba Kern Medical Center Campus Pharmacy shall be publicly  
19 reprovved by the Board of Pharmacy under Business and Professions Code section 495 in  
20 resolution of Accusation No. 7026, attached as exhibit A.

21 **Cost Recovery.** No later than 1 year from the effective date of the Decision, Respondent  
22 shall pay \$4,666.38 to the Board for its costs associated with the investigation and enforcement of  
23 this matter pursuant to Business and Professions Code Section 125.3. If Respondent fails to pay  
24 the Board costs as ordered, Respondent shall not be allowed to renew their Hospital Pharmacy  
25 License until Respondent pays costs in full. In addition, the Board may enforce this order for  
26 payment of its costs in any appropriate court, in addition to any other rights the Board may have.

27 **Full Compliance.** As a resolution of the charges in Accusation No. 7026, this stipulated  
28 settlement is contingent upon Respondent's full compliance with all conditions of this Order. If

1 Respondent fails to satisfy any of these conditions, such failure to comply constitutes cause for  
2 discipline, including outright revocation, of Respondent's Original Permit Number PHE 54462.

3 **ACCEPTANCE**

4 I, the undersigned, am authorized to sign this document on behalf of respondent, County of  
5 Kern, California, dba Kern Medical Center Campus Pharmacy, and have carefully read the above  
6 Stipulated Settlement and Disciplinary Order for Public Repeval and have fully discussed it with  
7 respondent's attorney, Mark B. Connely, Esq. I understand the stipulation and the effect it will  
8 have on respondent's Hospital Pharmacy License. Respondent enters into this Stipulated  
9 Settlement and Disciplinary Order for Public Repeval voluntarily, knowingly, and intelligently,  
10 and agrees to be bound by the Decision and Order of the Board of Pharmacy.

11  
12 DATED: \_\_\_\_\_

\_\_\_\_\_ KAREN BARNES  
General Counsel  
Authorized signatory for COUNTY OF KERN,  
CALIFORNIA, DBA KERN MEDICAL CENTER  
CAMPUS PHARMACY  
*Respondent*

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20 I have read and fully discussed with respondent County of Kern, California, dba Kern  
21 Medical Center Campus Pharmacy the terms and conditions and other matters contained in the  
22 above Stipulated Settlement and Disciplinary Order for Public Repeval. I approve its form and  
23 content.

24 DATED: \_\_\_\_\_

\_\_\_\_\_ MARK B. CONNELLY, ESQ.  
*Attorney for Respondent*

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1 Respondent fails to satisfy any of these conditions, such failure to comply constitutes cause for  
2 discipline, including outright revocation, of Respondent's Original Permit Number PHE 54462.

3 ACCEPTANCE

4 I, the undersigned, am authorized to sign this document on behalf of respondent, County of  
5 Kern, California, dba Kern Medical Center Campus Pharmacy, and have carefully read the above  
6 Stipulated Settlement and Disciplinary Order for Public Repeval and have fully discussed it with  
7 respondent's attorney, Mark B. Connely, Esq. I understand the stipulation and the effect it will  
8 have on respondent's Hospital Pharmacy License. Respondent enters into this Stipulated  
9 Settlement and Disciplinary Order for Public Repeval voluntarily, knowingly, and intelligently,  
10 and agrees to be bound by the Decision and Order of the Board of Pharmacy.

11  
12 DATED: 11/22/2021 Karen S. Barnes  
13 KAREN BARNES  
14 General Counsel  
15 Authorized signatory for COUNTY OF KERN,  
16 CALIFORNIA, DBA KERN MEDICAL CENTER  
17 CAMPUS PHARMACY  
18 *Respondent*

19  
20 I have read and fully discussed with respondent County of Kern, California, dba Kern  
21 Medical Center Campus Pharmacy the terms and conditions and other matters contained in the  
22 above Stipulated Settlement and Disciplinary Order for Public Repeval. I approve its form and  
23 content.

24 DATED: Nov. 17, 2021 Mark B Connely  
25 MARK B. CONNELLY, ESQ.  
*Attorney for Respondent*

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**ENDORSEMENT**

The foregoing Stipulated Settlement and Disciplinary Order for Public Repeval is hereby respectfully submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

DATED: \_\_\_\_\_

Respectfully submitted,  
  
ROB BONTA  
Attorney General of California  
SHAWN P. COOK  
Supervising Deputy Attorney General

MARIO CUAHUTLE  
Deputy Attorney General  
*Attorneys for Complainant*

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**ENDORSEMENT**

The foregoing Stipulated Settlement and Disciplinary Order for Public Reapproval is hereby respectfully submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

DATED: 11/23/21

Respectfully submitted,  
ROB BONTA  
Attorney General of California  
SHAWN P. COOK  
Supervising Deputy Attorney General

MARIO CUAHUTLE  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 7026**

1 XAVIER BECERRA  
Attorney General of California  
2 SHAWN P. COOK  
Supervising Deputy Attorney General  
3 MARIO CUAHUTLE  
Deputy Attorney General  
4 State Bar No. 305067  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6615  
6 Facsimile: (916) 731-2126  
E-mail: Mario.Cuahutle@doj.ca.gov  
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 Accusation Against:

Case No. 7026

13 **COUNTY OF KERN, CALIFORNIA, DBA**  
14 **KERN MEDICAL CENTER CAMPUS**  
15 **PHARMACY**  
2014 College Ave.  
16 **Bakersfield, CA 93305**

**ACCUSATION**

17 **Original Permit No. PHE 54462,**

18 **ALICIA LIRA CARABANTES**  
620 Voorhies Lane  
19 **Bakersfield, CA 93306**

20 **Pharmacy Technician Registration No. TCH**  
**28141,**

21 **and**

22 **SANJIT SINGH DHILLON**  
15732 San Marco Pl.  
23 **Bakersfield, CA 93314**

24 **Pharmacist License No. RPH 58780**

25 Respondents.

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1 **PARTIES**

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

4 2. On or about July 1, 2016, the Board of Pharmacy issued Original Permit Number  
5 PHE 54462 to County of Kern, California, dba Kern Medical Center Campus Pharmacy  
6 (Respondent Kern). The Original Permit Number was in full force and effect at all times relevant  
7 to the charges brought herein and will expire on November 1, 2021, unless renewed.

8 3. On or about January 21, 1999, the Board of Pharmacy issued Pharmacy Technician  
9 Registration Number TCH 28141 to Alicia Lira Carabantes (Respondent Carabantes). The  
10 Pharmacy Technician Registration was in full force and effect at all times relevant to the charges  
11 brought herein and will expire on April 30, 2022, unless renewed.

12 4. On or about September 7, 2006, the Board of Pharmacy issued Pharmacist License  
13 Number RPH 58780 to Sanjit Singh Dhillon (Respondent Dhillon). The Pharmacist License was  
14 in full force and effect at all times relevant to the charges brought herein and will expire on  
15 March 31, 2022, unless renewed.

16 **JURISDICTION**

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

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

24 **STATUTORY PROVISIONS**

25 7. Section 4300 of the Code states:

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

27 (b) The board shall discipline the holder of any license issued by the board,  
28 whose default has been entered or whose case has been heard by the board and found  
guilty, by any of the following methods:

1 (1) Suspending judgment.

2 (2) Placing him or her upon probation.

3 (3) Suspending his or her right to practice for a period not exceeding one year.

4 (4) Revoking his or her license.

5 (5) Taking any other action in relation to disciplining him or her as the board in its discretion may deem proper.

6 (c) The board may refuse a license to any applicant guilty of unprofessional  
7 conduct. The board may, in its sole discretion, issue a probationary license to any  
8 applicant for a license who is guilty of unprofessional conduct and who has met all  
9 other requirements for licensure. The board may issue the license subject to any  
10 terms or conditions not contrary to public policy, including, but not limited to, the  
11 following:

12 (1) Medical or psychiatric evaluation.

13 (2) Continuing medical or psychiatric treatment.

14 (3) Restriction of type or circumstances of practice.

15 (4) Continuing participation in a board-approved rehabilitation program.

16 (5) Abstention from the use of alcohol or drugs.

17 (6) Random fluid testing for alcohol or drugs.

18 (7) Compliance with laws and regulations governing the practice of pharmacy.

19 (d) The board may initiate disciplinary proceedings to revoke or suspend any  
20 probationary certificate of licensure for any violation of the terms and conditions of  
21 probation. Upon satisfactory completion of probation, the board shall convert the  
22 probationary certificate to a regular certificate, free of conditions.

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

28 8. Section 4300.1 of the Code states:

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

9. Section 4301 of the Code states:

The board shall take action against any holder of a license who is guilty of unprofessional conduct or whose license has been issued by mistake. Unprofessional

1 conduct shall include, but is not limited to, any of the following:

2 (a) Procurement of a license by fraud or misrepresentation.

3 (b) Incompetence.

4 (c) Gross negligence.

5 (d) The clearly excessive furnishing of controlled substances in violation of subdivision (a) of Section 11153 of the Health and Safety Code.

6 (e) The clearly excessive furnishing of controlled substances in violation of  
7 subdivision (a) of Section 11153.5 of the Health and Safety Code. Factors to be  
8 considered in determining whether the furnishing of controlled substances is clearly  
9 excessive shall include, but not be limited to, the amount of controlled substances  
10 furnished, the previous ordering pattern of the customer (including size and frequency  
11 of orders), the type and size of the customer, and where and to whom the customer  
12 distributes its product.

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  
15 licensee or otherwise, and whether the act is a felony or misdemeanor or not.

16 (g) Knowingly making or signing any certificate or other document that falsely  
17 represents the existence or nonexistence of a state of facts.

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

23 (i) Except as otherwise authorized by law, knowingly selling, furnishing, giving  
24 away, or administering, or offering to sell, furnish, give away, or administer, any  
25 controlled substance to an addict.

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

28 (k) The conviction of more than one misdemeanor or any felony involving the  
use, consumption, or self-administration of any dangerous drug or alcoholic beverage,  
or any combination of those substances.

(l) The conviction of a crime substantially related to the qualifications,  
functions, and duties of a licensee under this chapter. The record of conviction of a  
violation of Chapter 13 (commencing with Section 801) of Title 21 of the United  
States Code regulating controlled substances or of a violation of the statutes of this  
state regulating controlled substances or dangerous drugs shall be conclusive  
evidence of unprofessional conduct. In all other cases, the record of conviction shall  
be conclusive evidence only of the fact that the conviction occurred. The board may  
inquire into the circumstances surrounding the commission of the crime, in order to  
fix the degree of discipline or, in the case of a conviction not involving controlled  
substances or dangerous drugs, to determine if the conviction is of an offense  
substantially related to the qualifications, functions, and duties of a licensee under this  
chapter. A plea or verdict of guilty or a conviction following a plea of nolo  
contendere is deemed to be a conviction within the meaning of this provision. The

1 board may take action when the time for appeal has elapsed, or the judgment of  
2 conviction has been affirmed on appeal or when an order granting probation is made  
3 suspending the imposition of sentence, irrespective of a subsequent order under  
4 Section 1203.4 of the Penal Code allowing the person to withdraw his or her plea of  
5 guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or  
6 dismissing the accusation, information, or indictment.

7 (m) The cash compromise of a charge of violation of Chapter 13 (commencing  
8 with Section 801) of Title 21 of the United States Code regulating controlled  
9 substances or of Chapter 7 (commencing with Section 14000) of Part 3 of Division 9  
10 of the Welfare and Institutions Code relating to the Medi-Cal program.

11 (n) The revocation, suspension, or other discipline by another state of a license  
12 to practice pharmacy, operate a pharmacy, or do any other act for which a license is  
13 required by this chapter that would be grounds for revocation, suspension, or other  
14 discipline under this chapter. Any disciplinary action taken by the board pursuant to  
15 this section shall be coterminous with action taken by another state, except that the  
16 term of any discipline taken by the board may exceed that of another state, consistent  
17 with the board's enforcement guidelines. The evidence of discipline by another state  
18 is conclusive proof of unprofessional conduct.

19 (o) Violating or attempting to violate, directly or indirectly, or assisting in or  
20 abetting the violation of or conspiring to violate any provision or term of this chapter  
21 or of the applicable federal and state laws and regulations governing pharmacy,  
22 including regulations established by the board or by any other state or federal  
23 regulatory agency.

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

25 (q) Engaging in any conduct that subverts or attempts to subvert an  
26 investigation of the board.

27 (r) The selling, trading, transferring, or furnishing of drugs obtained pursuant to  
28 Section 256b of Title 42 of the United States Code to any person a licensee knows or  
reasonably should have known, not to be a patient of a covered entity, as defined in  
paragraph (4) of subsection (a) of Section 256b of Title 42 of the United States Code.

(s) The clearly excessive furnishing of dangerous drugs by a wholesaler to a  
pharmacy that primarily or solely dispenses prescription drugs to patients of long-  
term care facilities. Factors to be considered in determining whether the furnishing of  
dangerous drugs is clearly excessive shall include, but not be limited to, the amount  
of dangerous drugs furnished to a pharmacy that primarily or solely dispenses  
prescription drugs to patients of long-term care facilities, the previous ordering  
pattern of the pharmacy, and the general patient population to whom the pharmacy  
distributes the dangerous drugs. That a wholesaler has established, and employs, a  
tracking system that complies with the requirements of subdivision (b) of Section  
4164 shall be considered in determining whether there has been a violation of this  
subdivision. This provision shall not be interpreted to require a wholesaler to obtain  
personal medical information or be authorized to permit a wholesaler to have access  
to personal medical information except as otherwise authorized by Section 56 and  
following of the Civil Code. For purposes of this section, long-term care facility shall  
have the same meaning given the term in Section 1418 of the Health and Safety Code.

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1 patient, another licensed pharmacist serving the patient, or a person duly authorized by law to  
2 receive such information.”

3  
4 **COST RECOVERY**

5 13. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
6 administrative law judge to direct a licensee found to have committed a violation or violations of  
7 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
8 enforcement of the case, with failure of the licensee to comply subjecting the license to not being  
9 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
10 included in a stipulated settlement.

11 **FACTUAL ALLEGATIONS AS TO PATIENT HM**

12 14. On or about March 19, 2019, the Board received a complaint from the California  
13 Department of Public Health (CDPH) alleging that a pharmacy technician at Kern Medical Center  
14 Campus Pharmacy provided a prescription to a patient that was prescribed for another patient.  
15 The Board conducted an investigation of the complaint.

16 15. The Board’s investigation revealed that on or about January 15, 2019, Kern Medical  
17 Center Campus Pharmacy erroneously furnished patient HM’s Basaglar KwikPen to patient BM  
18 thus revealing patient HM’s medical information to patient BM without patient HM’s  
19 authorization. The erroneously dispensed Basaglar KwikPen to patient BM had directions to  
20 inject 40 units at bedtime when patient BM was prescribed Basaglar KwikPen with directions to  
21 inject 15 units every morning thus resulting in injecting of a wrong dose of medication.

22 16. At all times relevant, Respondent Dhillon was employed as the Pharmacist-in-Charge  
23 at Kern Medical Center Campus Pharmacy and Respondent Carabantes was employed as a  
24 Pharmacy Technician at Kern Medical Center Campus Pharmacy.

25 **FIRST CAUSE FOR DISCIPLINE**

26 (Unauthorized Disclosure of Prescriptions)

27 17. Respondent Kern, Respondent Dhillon, and Respondent Carabantes are subject to  
28 disciplinary action under Code section 4301, subdivision (o), in conjunction with California Code

1 of Regulations, title 16, section 1764, on the grounds of unprofessional conduct in that  
2 Respondent Kern erroneously furnished patient HM's Basaglar KwikPen to patient BM.  
3 Respondent Dhillon was the Pharmacist-in-Charge of Respondent Kern when this conduct  
4 occurred and Respondent Carabanates was the Pharmacy Technician who dispensed patient HM's  
5 Basaglar KwikPen to patient BM.

6 **SECOND CAUSE FOR DISCIPLINE**

7 (Variation from Prescriptions)

8 18. Respondent Kern, Respondent Dhillon, and Respondent Carabantes are subject to  
9 disciplinary action under Code section 4301, subdivision (o), in conjunction with California Code  
10 of Regulations, title 16, section 1716, on the grounds of unprofessional conduct in that  
11 Respondent Kern erroneously furnished patient HM's Basaglar KwikPen to patient BM, which  
12 mistakenly directed patient BM to inject 40 units at bedtime when patient BM was prescribed  
13 with directions to inject 15 units every morning. Respondent Dhillon was the Pharmacist-in-  
14 Charge of Respondent Kern when this conduct occurred and Respondent Carabanates was the  
15 Pharmacy Technician who dispensed patient HM's Basaglar KwikPen to patient BM, resulting in  
16 patient BM ingesting the wrong dose of medication.

17 **FACTUAL ALLEGATIONS AS TO PATIENT VR**

18 19. On or about March 19, 2019, the Board received a complaint from the California  
19 Department of Public Health (CDPH) alleging that a pharmacy technician at Kern Medical Center  
20 Campus Pharmacy incorrectly dispensed a patient's prescription to a different patient thus  
21 disclosing the patient's prescription information to an unauthorized individual. The Board  
22 conducted an investigation of the complaint.

23 20. The Board's investigation revealed that on or about November 20, 2018, patient LU  
24 was dispensed Bydureon BCise prescribed for patient VR.

25 21. At all times relevant, Respondent Dhillon was employed as the Pharmacist-in-Charge  
26 at Kern Medical Center Campus Pharmacy and Respondent Carabantes was employed as a  
27 Pharmacy Technician at Kern Medical Center Campus Pharmacy.

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**THIRD CAUSE FOR DISCIPLINE**

(Unauthorized Disclosure of Prescriptions)

22. Respondent Kern, Respondent Dhillon, and Respondent Carabantes are subject to disciplinary action under Code section 4301, subdivision (o), in conjunction with California Code of Regulations, title 16, section 1764, on the grounds of unprofessional conduct in that Respondent Kern erroneously dispensed patient VR’s Bydureon BCise to patient LU. Respondent Dhillon was the Pharmacist-in-Charge of Respondent Kern when this conduct occurred and Respondent Carabantes was the Pharmacy Technician who dispensed the Bydureon BCise to patient LU prescribed for patient VR.

**FACTUAL ALLEGATIONS AS TO PATIENT AB**

23. On or about March 19, 2019, the Board received a complaint from the California Department of Public Health (CDPH) alleging that Kern Medical Center Campus Pharmacy dispensed a restocked medication with previous patient label underneath the new prescription thus disclosing the previous patient’s information to an unauthorized individual. The Board conducted an investigation of the complaint.

24. The Board’s investigation revealed that on or about November 26, 2018, Kern Medical Center Campus Pharmacy dispensed patient AB’s Amoxicillin with prescription label for patient LP underneath AB’s prescription label thus revealing patient LP’s medical information to patient AB without patient LP’s authorization.

**FOURTH CAUSE FOR DISCIPLINE**

(Unauthorized Disclosure of Prescriptions)

25. Respondent Kern is subject to disciplinary action under Code section 4301, subdivision (o), in conjunction with California Code of Regulations, title 16, section 1764, on the grounds of unprofessional conduct in that Respondent Kern erroneously dispensed patient AB’s Amoxicillin with prescription label for patient LP underneath AB’s prescription label.

**FACTUAL ALLEGATIONS AS TO PATIENT BC**

26. On or about March 19, 2019, the Board received a complaint from the California Department of Public Health (CDPH) alleging that Sage Brush Medical Plaza Pharmacy

1 incorrectly dispensed a patient's prescription to a different patient thus disclosing the patient's  
2 prescription information to an unauthorized individual. The Board conducted an investigation of  
3 the complaint.

4 27. The Board's investigation revealed that on or about November 16, 2018, patient MC  
5 was dispensed Humira prescribed for patient BC.

6 28. At all times relevant, Respondent Dhillon was employed as the Pharmacist-in-Charge  
7 at Sage Brush Medical Plaza Pharmacy and Respondent Carabantes was employed as a Pharmacy  
8 Technician at Sage Brush Medical Plaza Pharmacy.

9 **FIFTH CAUSE FOR DISCIPLINE**

10 (Unauthorized Disclosure of Prescriptions)

11 29. Respondent Dhillon and Respondent Carabantes are subject to disciplinary action  
12 under Code section 4301, subdivision (o), in conjunction with California Code of Regulations,  
13 title 16, section 1764, on the grounds of unprofessional conduct in that Respondent Dhillon was  
14 the Pharmacist-in-Charge of Sage Brush Medical Plaza Pharmacy when this conduct occurred  
15 and Respondent Carabanates was the Pharmacy Technician who erroneously furnished patient  
16 BC's Humira to patient MC thus revealing patient BC's medical information to patient MC  
17 without patient BC's authorization.

18 **FACTUAL ALLEGATIONS AS TO PATIENT HS**

19 30. On or about March 19, 2019, the Board received a complaint from the California  
20 Department of Public Health (CDPH) alleging that Kern Medical Center Campus Pharmacy  
21 incorrectly dispensed a patient's prescription to a different patient thus disclosing the patient's  
22 prescription information to an unauthorized individual. The Board conducted an investigation of  
23 the complaint.

24 31. The Board's investigation revealed that on or about January 15, 2019, a pharmacy  
25 technician dispensed the wrong medication to the wrong patient. Specifically, patient HS #1 was  
26 dispensed Triamcinolone 0.1% cream labeled for a different patient HS #2 instead of prescribed  
27 Augmentin 125-31.25 mg/5ml for patient HS #1.



1 participated in any conduct for which the licensee was disciplined, he shall be prohibited from  
2 serving as a manager, administrator, owner, member, officer, director, associate, or partner of a  
3 licensee for five years if Pharmacy Permit Number PHE 54462 is placed on probation or until  
4 Pharmacy Permit Number PHE 54462 is reinstated if it is revoked.

5 37. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit Number  
6 PHE 54462 issued to County of Kern, California dba Kern Medical Center Campus Pharmacy,  
7 while Glenn Goldis has been an officer and/or owner and had knowledge of or knowingly  
8 participated in any conduct for which the licensee was disciplined, he shall be prohibited from  
9 serving as a manager, administrator, owner, member, officer, director, associate, or partner of a  
10 licensee for five years if Pharmacy Permit Number PHE 54462 is placed on probation or until  
11 Pharmacy Permit Number PHE 54462 is reinstated if it is revoked.

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**PRAYER**

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

1. Revoking or suspending Original Permit Number PHE 54462, issued to County of Kern, California, dba Kern Medical Center Campus Pharmacy;

2. Revoking or suspending Pharmacy Technician Registration Number TCH 28141, issued to Alicia Lira Carabantes;

3. Revoking or suspending Pharmacist License Number RPH 58780, issued to Sanjit Singh Dhillon;

4. Prohibiting Respondent County of Kern, California, dba Kern Medical Center Campus Pharmacy from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHE 54462 is placed on probation or until Pharmacy Permit Number PHE 54462 is reinstated if Pharmacy Permit Number PHE 54462 issued to County of Kern, California, dba Kern Medical Center Campus Pharmacy is revoked;

5. Prohibiting Russell Judd from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHE 54462 is placed on probation or until Pharmacy Permit Number PHE 54462 is reinstated if Pharmacy Permit Number PHE 54462 issued to County of Kern, California, dba Kern Medical Center Campus Pharmacy is revoked;

6. Prohibiting Glenn Goldis from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHE 54462 is placed on probation or until Pharmacy Permit Number PHE 54462 is reinstated if Pharmacy Permit Number PHE 54462 issued to County of Kern, California, dba Kern Medical Center Campus Pharmacy is revoked;

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7. Ordering Kern Medical Center Campus Pharmacy, Alicia Lira Carabantes and Sanjit Singh Dhillon to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,

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

DATED: 1/19/2021 \_\_\_\_\_

Signature on File  
\_\_\_\_\_  
ANNE SODERGREN  
Executive Officer  
Board of Pharmacy  
Department of Consumer Affairs  
State of California  
*Complainant*

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