

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

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

**CHRISTOPHER RICHARD ST. JOHN, Respondent**

**Pharmacy Technician License No. TCH 182061**

**Agency Case No. 7242**

**DECISION AND ORDER**

The attached Stipulated Surrender of License 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 May 10, 2023.

It is so ORDERED on April 10, 2023.

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 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 DAVID E. BRICE  
Supervising Deputy Attorney General  
3 PATRICIA WEBBER HEIM  
Deputy Attorney General  
4 State Bar No. 230889  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 210-7519  
Facsimile: (916) 327-8643  
7 E-mail: Patricia.Heim@doj.ca.gov  
*Attorneys for Complainant*  
8

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

12 In the Matter of the Accusation Against:

Case No. 7242

13 **CHRISTOPHER RICHARD ST. JOHN**  
14 **18393 Avenida Bonita N**  
**Sonora, CA 95370**  
15 **Pharmacy Technician License**  
16 **No. TCH 182061**

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

17 Respondent.  
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 Patricia Webber Heim, Deputy  
25 Attorney General.

26 2. Christopher Richard St. John (Respondent) is represented in this proceeding by  
27 attorney Charles B. Smith, Esq., whose address is: P.O. Box 619, Jamestown, CA 95327.  
28

///

3. On or about May 4, 2021, the Board issued Pharmacy Technician License No. TCH 182061 to Respondent. The Pharmacy Technician License was in full force and effect at all times relevant to the charges brought in Accusation No. 7242 and will expire on February 28, 2023, unless renewed.

## JURISDICTION

4. Accusation No. 7242 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 September 16, 2022. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 7242 is attached as Exhibit A and incorporated by reference.

## **ADVISEMENT AND WAIVERS**

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 7242. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; 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.

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

## CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 7242, agrees that cause exists for discipline and hereby surrenders his Pharmacy Technician License No. TCH 182061 for the Board's formal acceptance.

///

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

## CONTINGENCY

10. 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 and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. 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.

12. 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.

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

## ORDER

IT IS HEREBY ORDERED that Pharmacy Technician License No. TCH 182061, issued to Respondent Christopher Richard St. John, is surrendered and accepted by the Board.

1. The surrender of Respondent's Pharmacy Technician License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against

1 Respondent. This stipulation constitutes a record of the discipline and shall become a part of  
2 Respondent's license history with the Board.

3 2. Respondent shall lose all rights and privileges as a Pharmacy Technician in California  
4 as of the effective date of the Board's Decision and Order.

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

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

9 5. If he ever applies for licensure or petitions for reinstatement in the State of California,  
10 the Board shall treat it as a new application for licensure. Respondent must comply with all the  
11 laws, regulations and procedures for licensure in effect at the time the application or petition is  
12 filed, and all of the charges and allegations contained in Accusation No. 7242 shall be deemed to  
13 be true, correct and admitted by Respondent when the Board determines whether to grant or deny  
14 the application or petition.

15 6. Respondent shall pay the agency its costs of investigation and enforcement in the  
16 amount of \$7,265.25 prior to issuance of a new or reinstated license.

17 7. If Respondent should ever apply or reapply for a new license or certification, or  
18 petition for reinstatement of a license, by any other health care licensing agency in the State of  
19 California, all of the charges and allegations contained in Accusation, No. 7242 shall be deemed  
20 to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any  
21 other proceeding seeking to deny or restrict licensure.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 **ACCEPTANCE**

2 I have carefully read the above Stipulated Surrender of License and Order and have fully  
3 discussed it with my attorney Charles B. Smith, Esq. I understand the stipulation and the effect it  
4 will have on my Pharmacy Technician License. I enter into this Stipulated Surrender of License  
5 and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and  
6 Order of the Board of Pharmacy.

7  
8 DATED: \_\_\_\_\_  
9 CHRISTOPHER RICHARD ST. JOHN  
Respondent

10 I have read and fully discussed with Respondent Christopher Richard St. John the terms and  
11 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
12 approve its form and content.

13 DATED: \_\_\_\_\_  
14 CHARLES B. SMITH, ESQ.  
Attorney for Respondent

15  
16 **ENDORSEMENT**

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

19 DATED: \_\_\_\_\_ Respectfully submitted,  
20 ROB BONTA  
Attorney General of California  
21 DAVID E. BRICE  
Supervising Deputy Attorney General

22  
23  
24 PATRICIA WEBBER HEIM  
Deputy Attorney General  
25 Attorneys for Complainant

26  
27 SA2022300614  
28 36757509.docx

1 ACCEPTANCE


2 I have carefully read the above Stipulated Surrender of License and Order and have fully  
3 discussed it with my attorney Charles B. Smith, Esq. I understand the stipulation and the effect it  
4 will have on my Pharmacy Technician License. I enter into this Stipulated Surrender of License  
5 and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and  
6 Order of the Board of Pharmacy.

7  
8 DATED: 2/21/2023

  
9 CHRISTOPHER RICHARD ST. JOHN  
Respondent

10 I have read and fully discussed with Respondent Christopher Richard St. John the terms and  
11 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
12 approve its form and content.

13 DATED: 2/20/2022

  
14 CHARLES B. SMITH, ESQ.  
Attorney for Respondent

15 ENDORSEMENT

16  
17 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
18 for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

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

Respectfully submitted,  
20 ROB BONTA  
Attorney General of California  
21 DAVID E. BRICE  
22 Supervising Deputy Attorney General

23  
24 PATRICIA WEBBER HEIM  
Deputy Attorney General  
25 Attorneys for Complainant

26  
27 SA2022300614  
28 36757509.docx

1 **ACCEPTANCE**

2 I have carefully read the above Stipulated Surrender of License and Order and have fully  
3 discussed it with my attorney Charles B. Smith, Esq. I understand the stipulation and the effect it  
4 will have on my Pharmacy Technician License. I enter into this Stipulated Surrender of License  
5 and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and  
6 Order of the Board of Pharmacy.

7  
8 DATED: \_\_\_\_\_

9 CHRISTOPHER RICHARD ST. JOHN  
Respondent

10 I have read and fully discussed with Respondent Christopher Richard St. John the terms and  
11 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
12 approve its form and content.

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

14 CHARLES B. SMITH, ESQ.  
Attorney for Respondent

15  
16 **ENDORSEMENT**

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

19 DATED: March 8, 2023

Respectfully submitted,

20 ROB BONTA  
Attorney General of California  
21 DAVID E. BRICE  
Supervising Deputy Attorney General

22 

23 PATRICIA WEBBER HEIM  
24 Deputy Attorney General  
25 Attorneys for Complainant

26  
27 SA2022300614  
28 36757509.docx



**Exhibit A**

**Accusation No. 7242**

1 ROB BONTA  
Attorney General of California  
2 KAREN R. DENVIR  
Supervising Deputy Attorney General  
3 MALISSA N. SIEMANTEL  
Deputy Attorney General  
4 State Bar No. 240157  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 210-7555  
Facsimile: (916) 324-5567  
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. 7242

13 **CHRISTOPHER RICHARD ST. JOHN**  
18393 Avenida Bonita N  
14 Sonora, CA 95370

**ACCUSATION**

15 **Pharmacy Technician Registration No.**  
16 **TCH 182061**

17 Respondent.

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 May 4, 2021, the Board issued Pharmacy Technician Registration  
22 Number TCH 182061 to Christopher Richard St. John (Respondent). The Pharmacy Technician  
23 Registration was in full force and effect at all times relevant to the charges brought herein and  
24 will expire on February 28, 2023, unless renewed.

25 **JURISDICTION**

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

1           4.     Code section 4300 states:

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

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

5                   (1) Suspending judgment.

6                   (2) Placing him or her upon probation.

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

8                   (4) Revoking his or her license.

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

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

14                   (1) Medical or psychiatric evaluation.

15                   (2) Continuing medical or psychiatric treatment.

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

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

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

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

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

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

23           (e) The proceedings under this article shall be conducted in accordance with Chapter  
24           5 (commencing with Section 11500) of Part 1 of Division 3 of the Government Code,  
and the board shall have all the powers granted therein. The action shall be final,  
25           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.

26           5.     Code section 4300.1 states:

27           The expiration, cancellation, forfeiture, or suspension of a board-issued license by  
28           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

1 shall not deprive the board of jurisdiction to commence or proceed with any  
2 investigation of, or action or disciplinary proceeding against, the licensee or to render  
a decision suspending or revoking the license.

### 3 **STATUTORY PROVISIONS**

4 6. Code section 4301 states, in pertinent part:

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

7 ...

8 (f) The commission of any act involving moral turpitude, dishonesty, fraud,  
9 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.

10 ...

### 11 **COST RECOVERY**

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

### 16 **FACTUAL ALLEGATIONS**

17 8. On or about and between August 1, 2021, and August 31, 2021, while employed as a  
18 Pharmacy Technician at CVS Pharmacy (CVS) in Sonora, California, Respondent took a pack of  
19 Covid-19 vaccination cards from CVS.

20 9. On or about September 7, 2021, Respondent posted on social media, specifically  
21 Snap Chat, a photo of a pack of unused vaccination cards with a caption stating: "Selling cards.  
22 Who wants to (sic) me to make some out for them?" Respondent also posted a second photo of  
23 two computer monitors to make it appear that Respondent had access to lot number information,  
24 with a caption stating: "I have real LOT numbers that go with the cards and so let's be real with  
25 that last post Lot numbers is (sic) identification for the batch in which the vaccine was made,  
26 when and where; basically tracking."

27 ///

28 ///

10. On or about and between August 1, 2021 and September 13, 2021, Respondent was also working at Adventist Health Sonora-Pharmacy (AHSP), located in Sonora, California, as a medical reconciliation technician.

11. On or about September 9, 2021, when Respondent was asked during an AHSP investigation if he obtained the Covid-19 vaccination cards from AHSP or CVS, Respondent replied that he had obtained the cards "online."

12. On or about September 13, 2021, AHSP terminated Respondent's employment.

13. On or about September 21, 2021, while being interviewed by CVS, Respondent admitted to having taken the Covid-19 vaccination cards from CVS.

14. On or about September 27, 2021, Respondent admitted to the Board's inspector that he obtained the Covid-19 vaccination cards from the pharmacist's counter at CVS.

15. On or about September 28, 2021, CVS terminated Respondent's employment.

### **CAUSE FOR DISCIPLINE**

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

16. Respondent is subject to discipline under Code section 4301, subdivision (f), in that Respondent committed acts involving moral turpitude, dishonesty, fraud, deceit, or corruption as set forth in paragraphs 8 through 15, above, and as specifically set forth as follows:

a. Respondent took Covid-19 vaccination cards from CVS for his own use and without permission of CVS.

b. Respondent possessed Covid-19 vaccination cards with the intent to sell or furnish the vaccination cards with false or fraudulent information.

### **PRAYER**

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

1. Revoking or suspending Pharmacy Technician Registration Number TCH 182061, issued to Christopher Richard St. John;

///

///

1           2.     Ordering Christopher Richard St. John to pay the Board of Pharmacy the reasonable  
2 costs of the investigation and enforcement of this case, pursuant to Business and Professions  
3 Code section 125.3; and,

4           3.     Taking such other and further action as deemed necessary and proper.  
5

6  
7     DATED: 9/6/2022

Sodergren,  
Anne@DCA

Digitally signed by Sodergren,  
Anne@DCA  
Date: 2022.09.06 21:03:35  
-07'00'

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

8  
9  
10  
11  
12     SA2022300614  
13     35946082.docx  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28