



**California State Board of Pharmacy**  
 2720 Gateway Oaks Drive, Suite 100  
 Sacramento, CA 95833  
 Phone: (916) 518-3100 Fax: (916) 574-8614  
 www.pharmacy.ca.gov

Business, Consumer Services and Housing Agency  
 Department of Consumer Affairs  
 Gavin Newsom, Governor



**APPLICATION FOR VOLUNTARY SURRENDER OF PHARMACY TECHNICIAN LICENSE**

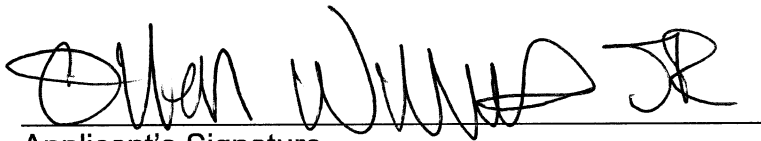
**PLEASE PRINT IN BLACK OR BLUE INK OR TYPE YOUR RESPONSES:**

Name of Licensee: Ollen Williams Jr	Case No.
Address of Record: 11787 Monte View Ct El Cajon, CA 92019	AC 2023 7661

Pursuant to the terms and conditions of my probation with the California State Board of Pharmacy (Board) in Case No. AC 2023 7661, I hereby request to surrender my pharmacy technician license, License No. TCH35994. The Board or its designee shall have the discretion whether to grant the request for surrender or take any other action it deems appropriate and reasonable. Upon formal acceptance of the surrender of the license, I will no longer be subject to the terms and conditions of probation. I understand that this surrender constitutes a record of discipline and shall become a part of my license history with the Board.

Upon the acceptance of the surrender, I shall relinquish my pharmacy technician license to the Board within ten (10) days of notification by the Board that the surrender is accepted. I understand that I may not reapply for any license, permit, or registration from the board for three (3) years from the effective date of the surrender. I further understand that I shall meet all requirements applicable to the license sought as of the date the application for that license is submitted to the Board, including any outstanding costs.

PLEASE BE ADVISED THAT YOU ARE NOT RELIEVED OF THE REQUIREMENTS OF YOUR PROBATION UNLESS THE BOARD NOTIFIES YOU THAT YOUR REQUEST TO SURRENDER YOUR LICENSE HAS BEEN ACCEPTED.

  
Applicant's Signature

05/12/2025  
Date

Ollen Williams Jr  
Applicant's Printed Name

TCH35994  
Applicant's License Number

\_\_\_\_\_  
Executive Officer's Approval

\_\_\_\_\_  
Date

All items on this application are mandatory in accordance with your probationary order and the Board's Disciplinary Guidelines as authorized by Title 16, California Code of Regulations section 1760. Failure to provide any of the requested information or providing unreadable information will result in the application being rejected as incomplete. The information provided on this form will be used to determine eligibility for surrender. The official responsible for information maintenance is the Executive Officer, telephone (916) 518-3100, 2720 Gateway Oaks Drive, Suite 100, Sacramento, CA 95833. The information you provide may also be disclosed in the following circumstances: (1) in response to a Public Records Act request; (2) to another government agency as required by state or federal law; or, (3) in response to a court or administrative order, a subpoena, or a search warrant. Each individual has the right to review the files or records maintained on them by our agency, unless the records are identified as confidential information and exempted by Section 1798.40 of the Civil Code.

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

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

**OLLEN WILLIAMS JR, Respondent**

**Pharmacy Technician License No. TCH 35994**

**Agency Case No. 7661**

**OAH No. 2024040903**

**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 November 20, 2024.

It is so ORDERED on October 21, 2024.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

By



Seung W. Oh, Pharm.D.  
Board President

1 ROB BONTA  
Attorney General of California  
2 GREGORY J. SALUTE  
Supervising Deputy Attorney General  
3 NICOLE R. TRAMA  
Deputy Attorney General  
4 State Bar No. 263607  
600 West Broadway, Suite 1800  
5 San Diego, CA 92101  
P.O. Box 85266  
6 San Diego, CA 92186-5266  
Telephone: (619) 738-9441  
7 Facsimile: (619) 645-2061  
*Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:  
14 **OLLEN WILLIAMS JR.**  
15 **11787 Monte View Ct.**  
16 **El Cajon, CA 92019**  
17 **Pharmacy Technician License No. TCH**  
18 **35994**  
19  
20 Respondent.

Case No. 7661  
OAH No. 2024040903  
**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER**

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

22 **PARTIES**

23 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy  
24 (Board). She brought this action solely in her official capacity and is represented in this matter by  
25 Rob Bonta, Attorney General of the State of California, by Nicole R. Trama, Deputy Attorney  
26 General.



1 **CULPABILITY**

2 9. Respondent admits the truth of each and every charge and allegation in Accusation  
3 No. 7661.

4 10. Respondent agrees that his Pharmacy Technician License is subject to discipline and  
5 he agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order  
6 below.

7 **CONTINGENCY**

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

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

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

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

1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Pharmacy Technician License No. TCH 35994 issued to  
3 Respondent Ollen Williams Jr. is revoked. However, the revocation is stayed and Respondent is  
4 placed on probation for three (3) years on the following terms and conditions:

5 **1. Obey All Laws**

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

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

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

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

21 **2. Report to the Board**

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

26 Failure to submit timely reports in a form as directed shall be considered a violation of  
27 probation. Any period(s) of delinquency in submission of reports as directed may be added to the  
28 total period of probation. Moreover, if the final probation report is not made as directed,

1 probation shall be automatically extended until such time as the final report is made and accepted  
2 by the Board.

3 **3. Interview with the Board**

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

9 **4. Cooperate with Board Staff**

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

16 **5. Reporting of Employment and Notice to Employers**

17 During the period of probation, Respondent shall notify all present and prospective  
18 employers of the decision in case number 7661 and the terms, conditions and restrictions imposed  
19 on Respondent by the decision, as follows:

20 Within thirty (30) days of the effective date of this decision, and within ten (10) days of  
21 undertaking any new employment, Respondent shall report to the Board in writing the name,  
22 physical address, and mailing address of each of Respondent's employer(s), and the name(s) and  
23 telephone number(s) of all of his direct supervisor(s), as well as any pharmacist(s)-in-charge,  
24 designated representative(s)-in-charge, responsible manager, or other compliance supervisor(s)  
25 and the work schedule, if known. Respondent shall also include the reason(s) for leaving the  
26 prior employment. Respondent shall sign and return to the Board a written consent authorizing  
27 the Board or its designee to communicate with all of Respondent's employer(s) and supervisor(s),  
28 and authorizing those employer(s) or supervisor(s) to communicate with the Board or its

1 designee, concerning Respondent's work status, performance, and monitoring. Failure to comply  
2 with the requirements or deadlines of this condition shall be considered a violation of probation.

3         Within thirty (30) days of the effective date of this decision, and within fifteen (15) days of  
4 Respondent undertaking any new employment, Respondent shall cause (a) his direct supervisor,  
5 (b) his pharmacist-in-charge, designated representative-in-charge, responsible manager, or other  
6 compliance supervisor, and (c) the owner or owner representative of his employer, to report to the  
7 Board in writing acknowledging that the listed individual(s) has/have read the decision in case  
8 number 7661, and terms and conditions imposed thereby. If one person serves in more than one  
9 role described in (a), (b), or (c), the acknowledgment shall so state. It shall be the Respondent's  
10 responsibility to ensure that these acknowledgment(s) are timely submitted to the Board. In the  
11 event of a change in the person(s) serving the role(s) described in (a), (b), or (c) during the term  
12 of probation, Respondent shall cause the person(s) taking over the role(s) to report to the Board in  
13 writing within fifteen (15) days of the change acknowledging that he or she has read the decision  
14 in case number 7661, and the terms and conditions imposed thereby.

15         If Respondent works for or is employed by or through an employment service, Respondent  
16 must notify the person(s) described in (a), (b), and (c) above at every entity licensed by the Board  
17 of the decision in case number 7661, and the terms and conditions imposed thereby in advance of  
18 Respondent commencing work at such licensed entity. A record of this notification must be  
19 provided to the Board upon request.

20         Furthermore, within thirty (30) days of the effective date of this decision, and within fifteen  
21 (15) days of Respondent undertaking any new employment by or through an employment service,  
22 Respondent shall cause the person(s) described in (a), (b), and (c) above at the employment  
23 service to report to the Board in writing acknowledging that he or she has read the decision in  
24 case number, and the terms and conditions imposed thereby. It shall be Respondent's  
25 responsibility to ensure that these acknowledgment(s) are timely submitted to the Board.

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

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

5 **6. Notification of Change(s) in Name, Address(es), or Phone Number(s)**

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

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

10 **7. Reimbursement of Board Costs**

11 As a condition precedent to successful completion of probation, Respondent shall pay to the  
12 Board its costs of investigation and prosecution in the amount of \$16,044. Respondent shall make  
13 said payments as follows: \$668.50 per month until paid in full.

14 There shall be no deviation from this schedule absent prior written approval by the Board or  
15 its designee. Failure to pay costs by the deadline(s) as directed shall be considered a violation of  
16 probation.

17 Respondent shall be permitted to pay these costs in a payment plan approved by the Board  
18 or its designee, so long as full payment is completed no later than one (1) year prior to the end  
19 date of probation.

20 **8. Probation Monitoring Costs**

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

25 **9. Status of License**

26 Respondent shall, at all times while on probation, maintain an active, current Pharmacy  
27 Technician License with the Board, including any period during which suspension or probation is  
28

1 tolled. Failure to maintain an active, current Pharmacy Technician License shall be considered a  
2 violation of probation.

3 If Respondent's Pharmacy Technician License expires or is cancelled by operation of law or  
4 otherwise at any time during the period of probation, including any extensions thereof due to  
5 tolling or otherwise, upon renewal or reapplication Respondent's license shall be subject to all  
6 terms and conditions of this probation not previously satisfied.

7 **10. License Surrender While on Probation/Suspension**

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

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

23 **11. Certification Prior to Resuming Work**

24 Respondent shall maintain an active, current certification as defined by Business and  
25 Professions Code section 4202, subdivision (a)(4), for the entire period of probation, and shall  
26 submit proof of re-certification or renewal of certification to the Board within ten (10) days of  
27 receipt. Failure to maintain active, current certification or to timely submit proof of same shall be  
28 considered a violation of probation.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**12. Practice Requirement – Extension of Probation**

Except during periods of suspension, Respondent shall, at all times while on probation, be employed as a pharmacy technician in California for a minimum of 100 hours per calendar month. Any month during which this minimum is not met shall extend the period of probation by one month. During any such period of insufficient employment, Respondent must nonetheless comply with all terms and conditions of probation, unless Respondent receives a waiver in writing from the Board or its designee.

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

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

**13. Violation of Probation**

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

1           If Respondent violates probation in any respect, the Board, after giving Respondent notice  
2 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that  
3 was stayed. If a petition to revoke probation or an accusation is filed against Respondent during  
4 probation, or the preparation of an accusation or petition to revoke probation is requested from  
5 the Office of the Attorney General, the Board shall have continuing jurisdiction and the period of  
6 probation shall be automatically extended until the petition to revoke probation or accusation is  
7 heard and decided.

8           **14. Completion of Probation**

9           Upon written notice by the Board or its designee indicating successful completion of  
10 probation, Respondent's license will be fully restored.

11           **15. Notification of Departure**

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

16           **16. Remedial Education**

17           Within ninety (90) days of the effective date of this decision, Respondent shall submit to  
18 the Board or its designee, for prior approval, an appropriate program of remedial education  
19 related to USP 797. The program of remedial education shall consist of at least six (6) hours each  
20 year of probation, at Respondent's own expense. All remedial education shall be in addition to,  
21 and shall not be credited toward, continuing education (CE) courses used for license renewal  
22 purposes for pharmacists.

23           Failure to timely submit for approval or complete the approved remedial education shall be  
24 considered a violation of probation. The period of probation will be automatically extended until  
25 such remedial education is successfully completed and written proof, in a form acceptable to the  
26 Board, is provided to the Board or its designee.

27           Following the completion of each course, the Board or its designee may require the  
28 Respondent, at his own expense, to take an approved examination to test the Respondent's

1 knowledge of the course. If the Respondent does not achieve a passing score on the examination  
2 that course shall not count towards satisfaction of this term. Respondent shall take another course  
3 approved by the Board in the same subject area.

4 **17. No Ownership or Management of Licensed Premises**

5 Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager,  
6 administrator, member, officer, director, trustee, associate, or partner of any business, firm,  
7 partnership, or corporation currently or hereinafter licensed by the Board. Respondent shall sell  
8 or transfer any legal or beneficial interest in any entity licensed by the Board within ninety (90)  
9 days following the effective date of this decision and shall immediately thereafter provide written  
10 proof thereof to the Board. Failure to timely divest any legal or beneficial interest(s) or provide  
11 documentation thereof shall be considered a violation of probation.

12 **ACCEPTANCE**

13 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
14 discussed it with my attorney, Michael A. Taibi, Esq. I understand the stipulation and the effect it  
15 will have on my Pharmacy Technician License. I enter into this Stipulated Settlement and  
16 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
17 Decision and Order of the Board of Pharmacy.

18  
19 DATED: \_\_\_\_\_

\_\_\_\_\_  
OLLEN WILLIAMS JR.  
*Respondent*

21 I have read and fully discussed with Respondent Ollen Williams Jr. the terms and  
22 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.  
23 I approve its form and content.

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

\_\_\_\_\_  
MICHAEL A. TAIBI, ESQ.  
*Attorney for Respondent*

1 knowledge of the course. If the Respondent does not achieve a passing score on the examination  
2 that course shall not count towards satisfaction of this term. Respondent shall take another course  
3 approved by the Board in the same subject area.

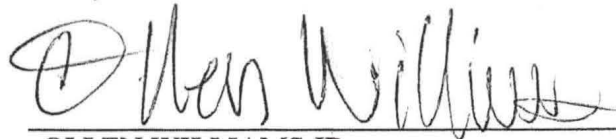
4 **17. No Ownership or Management of Licensed Premises**

5 Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager,  
6 administrator, member, officer, director, trustee, associate, or partner of any business, firm,  
7 partnership, or corporation currently or hereinafter licensed by the Board. Respondent shall sell  
8 or transfer any legal or beneficial interest in any entity licensed by the Board within ninety (90)  
9 days following the effective date of this decision and shall immediately thereafter provide written  
10 proof thereof to the Board. Failure to timely divest any legal or beneficial interest(s) or provide  
11 documentation thereof shall be considered a violation of probation.

12 **ACCEPTANCE**

13 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
14 discussed it with my attorney, Michael A. Taibi, Esq. I understand the stipulation and the effect it  
15 will have on my Pharmacy Technician License. I enter into this Stipulated Settlement and  
16 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
17 Decision and Order of the Board of Pharmacy.

18  
19 DATED: 9/20/24



20 OLLEN WILLIAMS JR.  
Respondent

21 I have read and fully discussed with Respondent Ollen Williams Jr. the terms and  
22 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.  
23 I approve its form and content.

24 DATED: 9/20/24



25 MICHAEL A. TAIBI, ESQ.  
Attorney for Respondent

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ENDORSEMENT**

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

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

Respectfully submitted,

ROB BONTA  
Attorney General of California  
GREGORY J. SALUTE  
Supervising Deputy Attorney General

NICOLE R. TRAMA  
Deputy Attorney General  
*Attorneys for Complainant*

SD2023802956

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ENDORSEMENT**

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

DATED: 9/20/2024

Respectfully submitted,  
ROB BONTA  
Attorney General of California  
GREGORY J. SALUTE  
Supervising Deputy Attorney General

*Nicole R. Trama*  
NICOLE R. TRAMA  
Deputy Attorney General  
*Attorneys for Complainant*

SD2023802956

**Exhibit A**

**Accusation No. 7661**

1 ROB BONTA  
Attorney General of California  
2 GREGORY J. SALUTE  
Supervising Deputy Attorney General  
3 NICOLE R. TRAMA  
Deputy Attorney General  
4 State Bar No. 263607  
600 West Broadway, Suite 1800  
5 San Diego, CA 92101  
P.O. Box 85266  
6 San Diego, CA 92186-5266  
Telephone: (619) 738-9441  
7 Facsimile: (619) 645-2061  
*Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:

Case No. 7661

14 **OLLEN WILLIAMS JR.**  
15 **11787 Monte View Ct.**  
**El Cajon, CA 92019**

**ACCUSATION**

16 **Pharmacy Technician License No. TCH**  
17 **35994**

Respondent.

18  
19  
20 **PARTIES**

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

23 2. On or about January 24, 2001, the Board of Pharmacy issued Pharmacy Technician  
24 License Number TCH 35994 to Ollen Williams Jr. (Respondent). The Pharmacy Technician  
25 License was in full force and effect at all times relevant to the charges brought herein and will  
26 expire on September 30, 2024, unless renewed.

27 ///

28 ///

**JURISDICTION**

1  
2       3.     This Accusation is brought before the Board of Pharmacy (Board), under the  
3 authority of the following laws. All section references are to the Business and Professions Code  
4 (Code) unless otherwise indicated.

5       4.     Code section 4300 states, in pertinent part:

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

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

10           (1) Suspending judgment.

11           (2) Placing him or her upon probation.

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

13           (4) Revoking his or her license.

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

16       5.     Code section 4300.1 states:

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

23       6.     Code section 4307 states, in pertinent part:

24           (a) Any person who has been denied a license or whose license has been  
25 revoked or is under suspension, or who has failed to renew his or her license while it  
26 was under suspension, or who has been a manager, administrator, owner, member,  
27 officer, director, associate, partner, or any other person with management or control  
28 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:

///

///

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

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

6 7. Section 4011 of the Code provides that the Board shall administer and enforce both  
7 the Pharmacy Law (Bus. & Prof. Code, § 4000 et seq.) and the Uniform Controlled Substances  
8 Act (Health & Safety Code, § 11000 et seq.).

9 8. Code section 4342, subdivision (a) states:

10 The board may institute any action or actions as may be provided by law and  
11 that, in its discretion, are necessary, to prevent the sale of pharmaceutical  
12 preparations and drugs that do not conform to the standard and tests as to quality and  
13 strength, provided in the latest edition of the United States Pharmacopoeia or the  
14 National Formulary, or that violate any provision of the Sherman Food, Drug, and  
15 Cosmetic Law (Part 5 (commencing with section 109875) of Division 104 of the  
16 Health & Safety Code).

17 **STATUTORY AND REGULATORY PROVISIONS**

18 9. Code section 4301 states, in pertinent part:

19 The board shall take action against any holder of a license who is guilty of  
20 unprofessional conduct. Unprofessional conduct shall include, but is not limited to,  
21 any of the following:

22 ...

23 (f) The commission of any act involving moral turpitude, dishonesty, fraud,  
24 deceit, or corruption, whether the act is committed in the course of relations as a  
25 licensee or otherwise, and whether the act is a felony or misdemeanor or not.

26 ...

27 (j) The violation of any of the statutes of this state, or any other state, or of the  
28 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.

///

///

1 10. Section 4022 of the Code states:

2 Dangerous drug or dangerous device means any drug or device unsafe for  
3 self-use in humans or animals, and includes the following:

4 (a) Any drug that bears the legend: Caution: federal law prohibits dispensing  
5 without prescription, Rx only, or words of similar import.

6 (b) Any device that bears the statement: Caution: federal law restricts this  
7 device to sale by or on the order of a \_\_\_\_\_, Rx only, or words of similar  
8 import, the blank to be filled in with the designation of the practitioner licensed to use  
9 or order use of the device.

10 (c) Any other drug or device that by federal or state law can be lawfully dispensed  
11 only on prescription or furnished pursuant to Section 4006.

12 11. Code section 4126.8 states,

13 The compounding of drug preparations by a pharmacy for furnishing, distribution,  
14 or use in this state shall be consistent with standards established in the pharmacy  
15 compounding chapters of the current version of the United States Pharmacopeia-  
16 National Formulary, including relevant testing and quality assurance. The board may  
17 adopt regulations to impose additional standards for compounding drug preparations.

18 12. Section 4169 of the Code states in pertinent part:

19 (a) A person or entity shall not do any of the following:

20 (1) Purchase, trade, sell, warehouse, distribute, or transfer dangerous drugs or  
21 dangerous devices at wholesale with a person or entity that is not licensed with the  
22 board as a wholesaler, third-party logistics provider, or pharmacy.

23 (2) Purchase, trade, sell, or transfer dangerous drugs that the person knew or  
24 reasonably should have known were adulterated, as set forth in Article 2 (commencing  
25 with Section 111250) of Chapter 6 of Part 5 of Division 104 of the Health and Safety  
26 Code.

27 ...

28 **FEDERAL STATUTES AND REGULATIONS**

13. 21 United States Code (U.S.C.) section 351 states in pertinent part:

A drug or device shall be deemed to be adulterated—

(a) Poisonous, insanitary, etc., ingredients; adequate controls in manufacture

(1) If it consists in whole or in part of any filthy, putrid, or decomposed  
substance; or

(2)(A) if it has been prepared, packed, or held under insanitary conditions  
whereby it may have been contaminated with filth, or whereby it may have been  
rendered injurious to health; or

(B) if it is a drug and the methods used in, or the facilities or controls used for,

1 its manufacture, processing, packing, or holding do not conform to or are not operated  
2 or administered in conformity with current good manufacturing practice to assure that  
3 such drug meets the requirements of this chapter as to safety and has the identity and  
4 strength, and meets the quality and purity characteristics, which it purports or is  
5 represented to possess...

6 14. 21 U.S.C. section 353a states in pertinent part:

7 (b) Compounded drug

8 (1) Licensed pharmacist and licensed physician

9 A drug product may be compounded under subsection (a) if the licensed  
10 pharmacist or licensed physician—

11 (A) compounds the drug product using bulk drug substances, as defined in  
12 regulations of the Secretary published at section 207.3(a)(4) of title 21 of the Code of  
13 Federal Regulations—

14 ...

15 (ii) that are manufactured by an establishment that is registered under section 360  
16 of this title (including a foreign establishment that is registered under section 360(i) of  
17 this title)

18 ...

### 19 REGULATORY PROVISIONS

20 15. California Code of Regulations, title 16, (Regulations) section 1735.1 states in  
21 pertinent part:

22 (ae) "Quality" means the absence of harmful levels of contaminants, including  
23 filth, putrid, or decomposed substances, the absence of active ingredients other than  
24 those listed on the label, and the absence of inactive ingredients other than those  
25 listed on the master formula document.

26 16. Regulations section 1735.2 states, in pertinent part:

27 ...

28 (i) Every compounded drug preparation shall be given a beyond use date  
representing the date or date and time beyond which the compounded drug  
preparation should not be used, stored, transported or administered, and  
determined based on the professional judgment of the pharmacist performing or  
supervising the compounding.

...

(4) In addition to the requirements of paragraph three (3), the drugs or  
compounded drug preparations tested and studied shall be identical in ingredients,  
specific and essential compounding steps, quality reviews, and packaging as the  
finished drug or compounded drug preparation.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

...

17. Regulations section 1764 states:

No pharmacist shall exhibit, discuss, or reveal the contents of any prescription, the therapeutic effect thereof, the nature, extent, or degree of illness suffered by any patient or any medical information furnished by the prescriber with any person other than the patient or his or her authorized representative, the prescriber or other licensed practitioner then caring for the patient, another licensed pharmacist serving the patient, or a person duly authorized by law to receive such information.

**HEALTH AND SAFETY CODE**

18. Health and Safety Code section 111250 states:

Any drug or device is adulterated if it consists, in whole or in part, of any filthy, putrid, or decomposed substance.

19. Health and Safety Code section 111255 states:

Any drug or device is adulterated if it has been produced, prepared, packed, or held under conditions whereby it may have been contaminated with filth, or whereby it may have been rendered injurious to health.

20. Health and Safety Code section 111295 states:

It is unlawful for any person to manufacture, sell, deliver, hold, or offer for sale any drug or device that is adulterated.

21. Health and Safety Code, section 111335, states:

Any drug or device is misbranded if its labeling or packaging does not conform to the requirements of Chapter 4 (commencing with Section 110290).

22. Health and Safety Code section 111430 states:

A drug or device is misbranded if it was manufactured in an establishment not duly registered with the Secretary of Health, Education, and Welfare of the United States.

23. Health and Safety Code section 111440 states:

It is unlawful for any person to manufacture, sell, deliver, hold, or offer for sale any drug or device that is misbranded.

**COST RECOVERY**

24. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of

1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
2 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being  
3 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
4 included in a stipulated settlement.

### 5 **FACTUAL ALLEGATIONS**

6 25. Since at least 2009, Respondent has worked at multiple locations where he  
7 compounded sterile preparations. From approximately 2009 to 2019, he worked as a pharmacy  
8 technician at a sterile compounding pharmacy, Southern California Compounding (SCC), whose  
9 primary practice was non-sterile to sterile preparations for intrathecal injection.<sup>1</sup>

10 26. Respondent was also a part owner of Southern California Compounding LLC, which  
11 was the parent company of SCC. Effective December 15, 2014, in the disciplinary case entitled  
12 *In the Matter of the Accusation Against Southern California Compounding Pharmacy LLC*, Case  
13 Number 4671, SCC's pharmacy permit and sterile compounding permit were revoked, the  
14 revocations were stayed, and they were placed on probation for 4 years following violations of  
15 Pharmacy Law relating to non-sterile to sterile compounding practices. Respondent, as part  
16 owner of SCC, signed the stipulated settlement and agreed to be bound to the disciplinary order  
17 against SCC.

18 27. In or around September 2020, Respondent began working at San Diego  
19 Comprehensive Pain Management Clinic (SDCPMC). SDCPMC is not a pharmacy and is not  
20 licensed by the Board of Pharmacy. While working at SDCPMC, Respondent compounded non-  
21 sterile to sterile compounded preparations for intrathecal injection in an unsafe environment and  
22 in an unsafe manner. Respondent knew that the environment, conditions, and methods of  
23 preparation for the compounds that he prepared were not safe and not compliant with the  
24 requirements under United States Pharmacopoeia (USP) 797.<sup>2</sup> More specifically, Respondent  
25 compounded non-sterile to sterile compounded preparations:

26 <sup>1</sup> Intrathecal administration is a route of administration for drugs via an injection into the  
27 spinal canal, or into the subarachnoid space.

28 <sup>2</sup> The standards in USP 797 apply to *all* persons who prepare compounded sterile  
preparations and in *all* places where compounded sterile preparations are prepared (e.g., hospitals

1 a. In an uncertified primary engineering control within an uncertified area. (Regulations  
2 1751(b), 1751.4(c), 1751.4(f); USP 797, Facility Design and Environmental Controls, page 11.)

3 b. Without doing any viable air or surface sampling to show the bioburden of the  
4 environments. (Regulations 1751.4(j); USP 797, Viable and Nonviable Environmental Sampling  
5 (ES) Testing, page 12.)

6 c. Without any validated training. (Regulations 1735.7 and 1751.6; USP 797, Personnel  
7 Training and Evaluation in Aseptic Manipulation Skills, page 5; USP 797, Competency  
8 Evaluation of Garbing and Aseptic Work Practice, page 16; USP 797, Responsibility of  
9 Compounding Personnel, page 2.)

10 d. Without having documentation showing that cleaning had occurred. (Regulations  
11 1751.4(d) and (e); USP 797, Cleaning and Disinfecting the Compounding Area, page 14; USP  
12 797, Surface Cleaning and Disinfection Sampling and Assessment, page 16)

13 e. Even though there was visible dust and dirt in the compounding area. (USP 797,  
14 Cleaning and Disinfecting the Compounding Area, page 14.)

15 f. Without having a working sink available for hand hygiene. (Regulations 1751(b);  
16 USP 797, Personnel Cleansing and Garbing, page 15.)

17 g. With inappropriate surfaces and items within the compounding area (which increase  
18 risk of contamination). (Regulations 1751(b) and 1751.4(c); USP 797, Facility Design and  
19 Environmental Controls, page 11.)

20 h. Without having any documents showing compliance with USP standards.  
21 (Regulations 1751.1; USP 797, Facility Design and Environmental Controls, page 11.)

22 i. Without having any data to show the filters used were appropriate to render the  
23 compounded sterile preparations as sterile. (USP 797, Verification of Compounding Accuracy  
24 and Sterility; USP 797, Sterilization of High-Risk Level CSPS by Filtration, page 8.)

25 ///

26 \_\_\_\_\_  
27 and other healthcare institutions, patient treatment clinics, pharmacies, physicians' practice  
28 facilities, and other locations and facilities in which CSPs are prepared, stored, and transported).  
Persons who perform sterile compounding include pharmacists, nurses, pharmacy technicians,  
and physicians. Accordingly, USP 797 applies to all healthcare personnel who prepare, store, and  
transport compounded sterile preparations.

1 j. Without having equipment to show that the filter had integrity to sterilize the  
2 compounded sterile preparations. (USP 797, Sterilization of High-Risk Level CSPS by Filtration,  
3 page 8.)

4 k. Without having data to show the compounded sterile preparations were sterile. (USP  
5 797, Verification of Compounding Accuracy and Sterility and Sterilization Methods, page 8.)

6 l. Without having any data to show the compounded sterile preparations met the labeled  
7 strength. (Regulations 1735.8.)

8 m. By assigning beyond use dates which were inappropriate for the environment in  
9 which they were compounded. (Regulations 1751.8(c); USP 797, Storage and Beyond-Use-  
10 Dating, page 20.)

11 n. By labeling vials as refrigerated but never storing them in the refrigerator.  
12 (Regulations 1735.4; USP 797, Storage and Beyond-Use-Dating, page 20.)

13 m. Without having any processes for depyrogenation.<sup>3</sup> (USP 797, Depyrogenation by  
14 Dry Heat, page 9; USP 797, High-Risk Level CSPs, page 5.)

15 o. Without having records to show calibration for the scales used. (Regulations  
16 1735.6(b) and (c); USP 797, Elements of Quality Control/Equipment, page 18.)

17 p. Without having appropriate garb. (Regulations 1751.5; USP 797, Personnel Cleansing  
18 and Garbing, page 15.)

19 q. Without having any data to show the level of pyrogens were acceptable in the  
20 compounded sterile preparations for intrathecal use. (USP 797, Finished Preparation Release  
21 Checks and Tests, page 19; USP 797, Bacterial Endotoxin (Pyrogen) Testing, page 20)

22 r. Without having any data to show any form of quality assurance program.  
23 (Regulations 1735.8 and 1751.7; USP 797, Elements of Quality Control; Responsibility of  
24 Compounding Personnel, page 2.)

25 ///

26 ///

27 \_\_\_\_\_  
28 <sup>3</sup> Depyrogenation is the process that removes pyrogens (molecules or substances that  
cause a febrile reaction).

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct)**

3 28. Respondent is subject to disciplinary action under Business and Professions Code  
4 section 4301, for unprofessional conduct, in that Respondent compounded non-sterile to sterile  
5 compounded preparations for intrathecal injection in an unsafe environment and in an unsafe  
6 manner, as set forth in paragraphs 25 through 27, above.

7 **SECOND CAUSE FOR DISCIPLINE**

8 **(Gross Negligence)**

9 29. Respondent is subject to disciplinary action under Business and Professions Code  
10 section 4301, for in that Respondent was gross negligent when he compounded non-sterile to  
11 sterile compounded preparations for intrathecal injection in an unsafe environment and in an  
12 unsafe manner, as set forth in paragraphs 25 through 27, above.

13 **OTHER MATTERS**

14 30. Pursuant to Code section 4307, if discipline is imposed on Ollen Williams Jr., then  
15 Ollen Williams Jr., shall be prohibited from serving as a manager, administrator, owner, member,  
16 officer, director, associate, or partner of a licensee for 1) a period not to exceed five (5) years if  
17 the pharmacy technician registration is placed on probation; or, 2) if the pharmacy technician  
18 registration is revoked, the prohibition shall continue until the pharmacy technician registration is  
19 reinstated.

20 **PRAYER**

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

23 1. Revoking or suspending Pharmacy Technician License Number TCH 35994, issued  
24 to Ollen Williams Jr.;

25 2. Prohibiting Ollen Williams Jr. from serving as a manager, administrator, owner,  
26 member, officer, director, associate, partner, or in any other position with management or control  
27 of any pharmacy licensee;

28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

3. Ordering Ollen Williams Jr. 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,

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

DATED: 1/31/2024

Sodergren,  
Anne@DCA

Digitally signed by  
Sodergren, Anne@DCA  
Date: 2024.01.31 18:47:48  
-08'00'

---

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

SD2023802956