

**STATE OF WASHINGTON
DEPARTMENT OF HEALTH
PHARMACY QUALITY ASSURANCE COMMISSION**

In the Matter of

GEOFFREY W. REYNOLDS
Credential No. PHRM.PH.00017863

Respondent

No. M2022-232

**STIPULATED FINDINGS OF FACT,
CONCLUSIONS OF LAW AND
AGREED ORDER**

The Pharmacy Quality Assurance Commission (Commission), through Anita Nath, Department of Health Staff Attorney, and Respondent, represented by counsel, Tim Rusk, stipulate and agree to the following:

1. PROCEDURAL STIPULATIONS

1.1 On August 9, 2022, the Commission issued a Statement of Charges against Respondent.

1.2 Respondent understands that the Commission is prepared to proceed to a hearing on the allegations in the Statement of Charges.

1.3 Respondent understands that if the allegations are proven at a hearing, the Commission has the authority to impose sanctions pursuant to RCW 18.130.160.

1.4 Respondent has the right to defend against the allegations in the Statement of Charges by presenting evidence at a hearing.

1.5 Respondent waives the opportunity for a hearing on the Statement of Charges provided that the Commission accepts this Stipulated Findings of Fact, Conclusions of Law and Agreed Order (Agreed Order).

1.6 The parties agree to resolve this matter by means of this Agreed Order.

1.7 Respondent understands that this Agreed Order is not binding unless and until it is signed by the Commission and served by the Adjudicative Clerk's Office.

1.8 If the Commission accepts this Agreed Order, it will be reported to the National Practitioner Databank (45 CFR Part 60) and elsewhere as required by law. It is a public document and will be placed on the Department of Health's website and otherwise disseminated as required by the Public Records Act (Chap. 42.56 RCW) and the Uniform Disciplinary Act. RCW 18.130.110.

1.9 If the Commission rejects this Agreed Order, Respondent waives any objection to the participation at hearing of any Commission members who heard the Agreed Order presentation.

2. FINDINGS OF FACT

Respondent and the Commission acknowledge that the evidence is sufficient to justify the following findings of fact and the Commission makes those findings:

1.1 On August 22, 1994, the State of Washington issued Respondent a credential to practice as a pharmacist. Respondent's credential is currently active.

1.2 At all times relevant to these allegations, Respondent worked as a pharmacist at Walgreen's Pharmacy in East Wenatchee, WA.

1.3 On or about September 13, 2021, rather than administering the COVID-19 vaccine to Patient A, Respondent wasted the dose. Respondent then fraudulently documented that he administered the vaccine to Patient A, including on a Vaccine Administration Record and Patient A's COVID-19 vaccination card.

1.4 On or about October 5, 2021, rather than administering a second dose of the COVID-19 vaccine to Patient A, Respondent wasted the dose. Respondent then fraudulently documented that he administered the vaccine to Patient A, including on a Vaccine Administration Record and Patient A's COVID-19 vaccination card.

1.5 On or about September 20, 2021, rather than administering a second dose of the COVID-19 vaccine to Patient B, Respondent wasted the dose. Respondent then fraudulently documented that he administered the vaccine to Patient B, including on a Vaccine Administration Record and Patient B's COVID-19 vaccination card.

3. CONCLUSIONS OF LAW

The Commission and Respondent agree to the entry of the following Conclusions of Law:

3.1 The Commission has jurisdiction over Respondent and over the subject matter of this proceeding.

3.2 Respondent has committed unprofessional conduct in violation of RCW 18.130.180(1), (7), (13), RCW 69.41.020(3), and RCW 69.41.042.

3.3 The above violation provides grounds for imposing sanctions under RCW 18.130.160.

4. COMPLIANCE WITH SANCTION RULES

4.1 The disciplining authority applies WAC 246-16-800, *et seq.*, to determine appropriate sanctions. WAC 246-16-800(2)(c) requires the disciplining authority to impose terms based on a specific sanction schedule unless “the schedule does not adequately address the facts in a case.”

4.2 The sanction schedules stated in the rules do not address the conduct in this case. RCW 18.130.390 and WAC 246-16-800(2)(d) require the disciplining authority to use its judgment to determine appropriate sanctions when the sanction schedules do not address the conduct in question. The disciplining authority finds that requiring Respondent to pay a fine and complete continuing education in the area of ethics and pharmacist responsibility is sufficient to protect the health and welfare of the public.

5. AGREED ORDER

Based on the Findings of Fact and Conclusions of Law, the Commission and Respondent agree to entry of the following Agreed Order:

5.1 Respondent shall pay a fine to the Commission in the amount of one thousand dollars (\$1,000.00), which must be received by the Commission within ninety (90) days of the effective date of this Agreed Order. The fine shall be paid by personal check, certified or cashier’s check, or money order, made payable to the Department of Health and mailed to the Department of Health, Pharmacy Quality Assurance Commission, at PO Box 1099, Olympia, WA 98507-1099.

5.2 Within three (3) months of the effective date of this Agreed Order, Respondent shall complete a minimum of ten (10) hours of continuing education, pre-approved by the Commission, in the area of ethics and pharmacist responsibility. Respondent shall provide the Commission with proof of completion of such continuing education within thirty (30) days of such completion. Failure to complete and show proof of completion of the required minimum hours of pre-approved continuing education in the specified area within the specified times shall constitute a violation of this Agreed Order. These ten (10) hours of continuing education shall be in addition to mandatory continuing education hours that may be required for credential renewal.

5.3 Respondent shall obey all federal, state and local laws and all administrative rules governing the practice of the profession in Washington.

5.4 The Commission or its designee may verify Respondent's compliance with the terms and conditions of this Agreed Order, if applicable.

5.5 Any documents required by this Agreed Order shall be sent to Department of Health Compliance at PO Box 47873, Olympia, WA 98504-7873.

5.6 Respondent is responsible for all costs of complying with this Agreed Order.

5.7 Respondent shall inform the Department of Health Office of Customer Service, in writing, of changes in Respondent's residential and/or business address within thirty (30) days of the change. The mailing address for the Office of Customer Service is PO Box 47865, Olympia, WA 98504-7865.

5.8 The effective date of this Agreed Order is the date the Adjudicative Clerk's Office places the signed Agreed Order into the U.S. mail. If required, Respondent shall not submit any fees or compliance documents until after the effective date of this Agreed Order.

6. FAILURE TO COMPLY

Protection of the public requires practice under the terms and conditions imposed in this order. Failure to comply with the terms and conditions of this order may result in suspension of the credential after a show cause hearing. If Respondent fails to comply with the terms and conditions of this order, the Commission may hold a hearing to require Respondent to show cause why the credential should not be suspended. Alternatively, the Commission may bring additional charges of unprofessional conduct under RCW 18.130.180(9). In either case, Respondent will be afforded notice and an opportunity for a hearing on the issue of non-compliance.


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7. ACCEPTANCE

I, Geoffrey W. Reynolds, have read, understand and agree to this Agreed Order.
This Agreed Order may be presented to the Commission without my appearance. I
understand that I will receive a signed copy if the Commission accepts this Agreed Order.



GEOFFREY W. REYNOLDS
RESPONDENT

08/22/2022

DATE

8. ORDER

The Commission accepts and enters this Stipulated Findings of Fact, Conclusions of Law and Agreed Order.

DATED: 9th day of September, 2022

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
PHARMACY QUALITY ASSURANCE
COMMISSION



PANEL CHAIR

PRESENTED BY:



ANITA D. NATH, WSBA #54180
DEPARTMENT OF HEALTH STAFF ATTORNEY

9/12/2022

DATE