



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

RE: Geoffrey W. Reynolds
Master Case No.: M2022-232
Document: Statement of Charges

Regarding your request for information about the above-named practitioner; attached is a true and correct copy of the document on file with the State of Washington, Department of Health, Adjudicative Clerk Office. These records are considered Certified by the Department of Health.

Certain information may have been withheld pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld:

Investigative, law enforcement, and crime victim information is exempt from public inspection and copying pursuant to RCW 42.56.240(1).

If you have any questions or need additional information regarding the information that was withheld, please contact:

Customer Service Center
P.O. Box 47865
Olympia, WA 98504-7865
Phone: (360) 236-4700
Fax: (360) 586-2171

You may appeal the decision to withhold any information by writing to the Privacy Officer, Department of Health, P.O. Box 47890, Olympia, WA 98504-7890.

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

FILED

AUG 11 2022

In the Matter of

No. M2022-232

Adjudicative Clerk Office

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

STATEMENT OF CHARGES

Respondent

The interim executive director of the Pharmacy Quality Assurance Commission (Commission), on designation by the Commission, makes the allegations below, which are supported by the evidence contained in case no. 2021-13362. The patients referred to in this Statement of Charges is identified in the attached Confidential Schedule.

1. ALLEGED FACTS

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.

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ORIGINAL

2. ALLEGED VIOLATIONS

2.1 Based on the Alleged Facts, 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 which provide:

RCW 18.130.180 Unprofessional conduct. The following conduct, acts, or conditions constitute unprofessional conduct for any license holder under the jurisdiction of this chapter:

(1) The commission of any act involving moral turpitude, dishonesty, or corruption relating to the practice of the person's profession, whether the act constitutes a crime or not. If the act constitutes a crime, conviction in a criminal proceeding is not a condition precedent to disciplinary action. Upon such a conviction, however, the judgment and sentence is conclusive evidence at the ensuing disciplinary hearing of the guilt of the license holder of the crime described in the indictment or information, and of the person's violation of the statute on which it is based. For the purposes of this section, conviction includes all instances in which a plea of guilty or nolo contendere is the basis for the conviction and all proceedings in which the sentence has been deferred or suspended. Nothing in this section abrogates rights guaranteed under chapter 9.96A RCW;

...

(7) Violation of any state or federal statute or administrative rule regulating the profession in question, including any statute or rule defining or establishing standards of patient care or professional conduct or practice;

...

(13) Misrepresentation or fraud in any aspect of the conduct of the business or profession

...

RCW 69.41.020 Prohibited acts—Information not privileged communication.

Legend drugs shall not be sold, delivered, dispensed or administered except in accordance with this chapter.

...

(3) No person shall willfully make a false statement in any prescription, order, report, or record, required by this chapter.

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RCW 69.41.042 Record requirements.

A pharmaceutical manufacturer, wholesaler, pharmacy, or practitioner who purchases, dispenses, or distributes legend drugs shall maintain invoices or such other records as are necessary to account for the receipt and disposition of the legend drugs.

The records maintained pursuant to this section shall be available for inspection by the commission and its authorized representatives and shall be maintained for two years.

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

3. NOTICE TO RESPONDENT

The charges in this document affect the public health, safety and welfare. The interim executive director of the Commission directs that a notice be issued and served on Respondent as provided by law, giving Respondent the opportunity to defend against these charges. If Respondent fails to defend against these charges, Respondent shall be subject to discipline and the imposition of sanctions under Chapter 18.130 RCW.

DATED: August 9, 2022

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
PHARMACY QUALITY ASSURANCE
COMMISSION

Marlee B. O'Neill

Marlee B. O'Neill (Aug 2, 2022 14:33 PDT)

MARLEE B. O'NEILL
INTERIM EXECUTIVE DIRECTOR

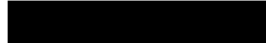


CHRISTINA PFLUGER, WSBA #44231
ASSISTANT ATTORNEY GENERAL

CONFIDENTIAL SCHEDULE

This information is confidential and is NOT to be released without the consent of the individual or individuals named below. RCW 42.56.240(1)

Patient A:



Patient B:

