



**California State Board of Pharmacy**  
 1625 N. Market Blvd, N219, Sacramento, CA 95834  
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 www.pharmacy.ca.gov

Received  
 JUN 13 2013  
 STATE AND CONSUMER SERVICES AGENCY  
 DEPARTMENT OF CONSUMER AFFAIRS  
 GOVERNOR EDMUND G. BROWN JR.  
 California State Board of Pharmacy

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

PLEASE PRINT IN BLACK OR BLUE INK OR TYPE YOUR RESPONSES

Name: <u>Grigor Aitayan</u>	Case No. <u>3589</u>
Address of Record: <u>535 E. Barfield Ave #82</u> <u>Glendale, CA 91205</u>	

Pursuant to the terms and conditions of my probation with the California State Board of Pharmacy (Board) in Case No. 3589, I hereby request to surrender my pharmacy technician license; License No. 67429. 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.

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.

*Grigor Aitayan*  
 Applicant's Signature

06.07.13  
 Date

*W. Harold*  
 Executive Officer's Approval

6/19/13  
 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) 574-7900, 1625 N. Market Blvd., Suite N-219, Sacramento, CA 95834. 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 First Amended Accusation  
Against:

**GRIGOR GILAVYAN**  
535 E. Garfield Avenue, #2  
Glendale, CA 91205

Pharmacy Technician License No. TCH 67429

Respondent.

Case No. 3589

OAH No. 2012020662

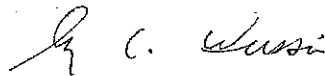
**DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary Order is here by adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This decision shall become effective on December 28, 2012.

It is so ORDERED on November 28, 2012.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA



By

\_\_\_\_\_  
STANLEY C. WEISSER  
Board President

1 KAMALA D. HARRIS.  
Attorney General of California  
2 KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
3 GEOFFREY WARD  
Deputy Attorney General  
4 State Bar No. 246437  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2660  
6 Facsimile: (213) 897-2804  
E-mail: Geoffrey.Ward@doj.ca.gov  
7 *Attorneys for Complainant*

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

11 In the Matter of the First Amended Accusation  
Against:

12 **GRIGOR GILAVYAN**  
13 **535 E. Garfield Avenue, #2**  
14 **Glendale, CA 91205**

15 **Pharmacy Technician Registration No. TCH**  
**67429**

16 Respondent.

Case No. 3589

OAH No. 2012020662

**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER**

17  
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
19 entitled proceedings that the following matters are true:

20 PARTIES

21 1. Virginia Herold (Complainant) is the Executive Officer of the Board of Pharmacy.  
22 She brought this action solely in her official capacity and is represented in this matter by Kamala  
23 D. Harris, Attorney General of the State of California, by Geoffrey Ward, Deputy Attorney  
24 General.

25 2. Respondent Grigor Gilavyan (Respondent) is represented in this proceeding by  
26 attorney Enna Berjikian, whose address is: 1535 E. Colorado St., Glendale, CA 91205.

27 3. On or about February 22, 2006, the Board of Pharmacy issued Pharmacy Technician  
28 Registration No. TCH 67429 to Grigor Gilavyan (Respondent). The Pharmacy Technician

1 Registration was in full force and effect at all times relevant to the charges brought in the First  
2 Amended First Amended Accusation No. 3589 and will expire on August 31, 2013, unless  
3 renewed.

4 JURISDICTION

5 4. The First Amended Accusation No. 3589 was filed before the Board of Pharmacy  
6 (Board), Department of Consumer Affairs, and is currently pending against Respondent. The  
7 original Accusation and all other statutorily required documents were properly served on  
8 Respondent on November 9, 2011. Respondent timely filed his Notice of Defense contesting the  
9 original Accusation. The First Amended Accusation and all statutorily required documents were  
10 properly served on Respondent's counsel on May 31, 2012. The charges in the First Amended  
11 Accusation were deemed controverted by the original Notice of Defense pursuant to Government  
12 Code section 11507.

13 5. A copy of the First Amended Accusation No. 3589 is attached as exhibit A and  
14 incorporated herein by reference.

15 ADVISEMENT AND WAIVERS

16 6. Respondent has carefully read, fully discussed with counsel, and understands the  
17 charges and allegations in First Amended Accusation No. 3589. Respondent has also carefully  
18 read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and  
19 Disciplinary Order.

20 7. Respondent is fully aware of his legal rights in this matter, including the right to a  
21 hearing on the charges and allegations in the First Amended Accusation; the right to be  
22 represented by counsel at his own expense; the right to confront and cross-examine the witnesses  
23 against him; the right to present evidence and to testify on his own behalf; the right to the  
24 issuance of subpoenas to compel the attendance of witnesses and the production of documents;  
25 the right to reconsideration and court review of an adverse decision; and all other rights accorded  
26 by the California Administrative Procedure Act and other applicable laws.

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

1 CULPABILITY

2 9. Respondent admits the truth of each and every charge and allegation in First  
3 Amended Accusation No. 3589.

4 10. Respondent agrees that his Pharmacy Technician Registration is subject to discipline  
5 and 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 facsimile copies of this Stipulated Settlement  
18 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and  
19 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 Registration No. TCH 67429 issued  
3 to Respondent Grigor Gilavyan (Respondent) is revoked. However, the revocation is stayed and  
4 Respondent is placed on probation for three years on the following terms and conditions.

5 1. **Certification Prior to Resuming Work**

6 Respondent shall be automatically suspended from working as a pharmacy technician until  
7 he is certified as defined by Business and Professions Code section 4202(a)(4) and provides  
8 satisfactory proof of certification to the board. Respondent shall not resume working as a  
9 pharmacy technician until notified by the board. Failure to achieve certification within one year  
10 shall be considered a violation of probation. Respondent shall not resume working as a pharmacy  
11 technician until notified by the board.

12 During suspension, respondent shall not enter any pharmacy area or any portion of any  
13 other board licensed premises (wholesaler, veterinary food-animal drug retailer or any other  
14 distributor of drugs) any drug manufacturer, or any other location where dangerous drugs and  
15 devices or controlled substances are maintained. Respondent shall not do any act involving drug  
16 selection, selection of stock, manufacturing, compounding or dispensing; nor shall respondent  
17 manage, administer, or assist any licensee of the board. Respondent shall not have access to or  
18 control the ordering, manufacturing or dispensing of dangerous drugs and devices or controlled  
19 substances. Respondent shall not resume work until notified by the board.

20 Subject to the above restrictions, respondent may continue to own or hold an interest in any  
21 licensed premises by the board in which he holds an interest at the time this decision becomes  
22 effective unless otherwise specified in this order.

23 Failure to comply with this suspension shall be considered a violation of probation.

24 2. **Obey All Laws**

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

26 Respondent shall report any of the following occurrences to the board, in writing, within 72  
27 hours of such occurrence:

28  an arrest or issuance of a criminal complaint for violation of any provision of the

1 Pharmacy Law, state and federal food and drug laws, or state and federal controlled  
2 substances laws

- 3  a plea of guilty or nolo contendere in any state or federal criminal proceeding to any  
4 criminal complaint, information or indictment
- 5  a conviction of any crime
- 6  discipline, citation, or other administrative action filed by any state or federal agency  
7 which involves respondent's pharmacy technician license or which is related to the  
8 practice of pharmacy or the manufacturing, obtaining, handling, distributing, billing,  
9 or charging for any drug, device or controlled substance.

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

11 **3. Report to the Board**

12 Respondent shall report to the board quarterly, on a schedule as directed by the board or its  
13 designee. The report shall be made either in person or in writing, as directed. Among other  
14 requirements, respondent shall state in each report under penalty of perjury whether there has  
15 been compliance with all the terms and conditions of probation. Failure to submit timely reports  
16 in a form as directed shall be considered a violation of probation. Any period(s) of delinquency  
17 in submission of reports as directed may be added to the total period of probation. Moreover, if  
18 the final probation report is not made as directed, probation shall be automatically extended until  
19 such time as the final report is made and accepted by the board.

20 **4. Interview with the Board**

21 Upon receipt of reasonable prior notice, respondent shall appear in person for interviews  
22 with the board or its designee, at such intervals and locations as are determined by the board or its  
23 designee. Failure to appear for any scheduled interview without prior notification to board staff,  
24 or failure to appear at two or more scheduled interviews with the board or its designee during the  
25 period of probation, shall be considered a violation of probation.

26 **5. Cooperate with Board Staff**

27 Respondent shall cooperate with the board's inspection program and with the board's  
28 monitoring and investigation of respondent's compliance with the terms and conditions of his

1 probation. Failure to cooperate shall be considered a violation of probation.

2 **6. Notice to Employers**

3 During the period of probation, respondent shall notify all present and prospective  
4 employers of the decision in case number 3589 and the terms, conditions and restrictions imposed  
5 on respondent by the decision, as follows:

6 Within 30 days of the effective date of this decision, and within 15 days of Respondent  
7 undertaking any new employment, Respondent shall cause his direct supervisor, pharmacist-in-  
8 charge (including each new pharmacist-in-charge employed during respondent's tenure of  
9 employment) and owner to report to the board in writing acknowledging that the listed  
10 individual(s) has/have read the decision in case number 3589 and the terms and conditions  
11 imposed thereby. It shall be Respondent's responsibility to ensure that his employer(s) and/or  
12 supervisor(s) submit timely acknowledgement(s) to the board.

13 If Respondent works for or is employed by or through a pharmacy employment service,  
14 respondent must notify his direct supervisor, pharmacist-in-charge and owner at every pharmacy  
15 of the terms and conditions of the decision in case number 3589 in advance of the respondent  
16 commencing work at each pharmacy. A record of this notification must be provided to the board  
17 upon request.

18 Furthermore, within 30 days of the effective date of this decision, and within 15 days of  
19 Respondent undertaking any new employment by or through a pharmacy employment service,  
20 Respondent shall cause his direct supervisor with the pharmacy employment service to report to  
21 the board in writing acknowledging that he has read the decision in case number 3589 and the  
22 terms and conditions imposed thereby. It shall be Respondent's responsibility to ensure that his  
23 employer(s) and/or supervisor(s) submit timely acknowledgment(s) to the board.

24 Failure to timely notify present or prospective employer(s) or to cause that/those  
25 employer(s) to submit timely acknowledgements to the board shall be considered a violation of  
26 probation.

27 "Employment" within the meaning of this provision shall include any full-time,  
28 part-time, temporary or relief service or pharmacy management service as a pharmacy



1 technician or in any position for which a pharmacy technician license is a requirement  
2 or criterion for employment, whether the respondent is considered an employee,  
3 independent contractor or volunteer.

4 **7. Reimbursement of Board Costs**

5 As a condition precedent to successful completion of probation, respondent shall pay to the  
6 Board its costs of investigation and prosecution in the amount of \$2,500. Respondent shall  
7 complete repayment of these costs by one month before the original completion date of his  
8 probation and shall comply with any repayment plan set by the Board's probation monitor. There  
9 shall be no deviation from this deadline absent prior written approval by the board or its designee.  
10 Failure to pay costs by the deadline(s) as directed shall be considered a violation of probation.

11 The filing of bankruptcy by respondent shall not relieve respondent of his responsibility to  
12 reimburse the board its costs of investigation and prosecution.

13 **8. Probation Monitoring Costs**

14 Respondent shall pay any costs associated with probation monitoring as determined by the  
15 board each and every year of probation. Such costs shall be payable to the board on a schedule as  
16 directed by the board or its designee. Failure to pay such costs by the deadline(s) as directed shall  
17 be considered a violation of probation.

18 **9. Status of License**

19 Respondent shall, at all times while on probation, maintain an active, current pharmacy  
20 technician license with the board, including any period during which suspension or probation is  
21 tolled. Failure to maintain an active, current license shall be considered a violation of probation.

22 If respondent's pharmacy technician license expires or is cancelled by operation of law or  
23 otherwise at any time during the period of probation, including any extensions thereof due to  
24 tolling or otherwise, upon renewal or reapplication respondent's license shall be subject to all  
25 terms and conditions of this probation not previously satisfied.

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

27 Following the effective date of this decision, should respondent cease work due to  
28 retirement or health, or be otherwise unable to satisfy the terms and conditions of probation,

1 respondent may tender his pharmacy technician license to the board for surrender. The board or  
2 its designee shall have the discretion whether to grant the request for surrender or take any other  
3 action it deems appropriate and reasonable. Upon formal acceptance of the surrender of the  
4 license, respondent will no longer be subject to the terms and conditions of probation. This  
5 surrender constitutes a record of discipline and shall become a part of the respondent's license  
6 history with the board.

7       Upon acceptance of the surrender, respondent shall relinquish his pharmacy technician  
8 license to the board within 10 days of notification by the board that the surrender is accepted.  
9 Respondent may not reapply for any license, permit, or registration from the board for three years  
10 from the effective date of the surrender. Respondent shall meet all requirements applicable to the  
11 license sought as of the date the application for that license is submitted to the board.

12       **11. Notification of a Change in Name, Residence Address, Mailing Address or**  
13 **Employment**

14       Respondent shall notify the board in writing within 10 days of any change of employment.  
15 Said notification shall include the reasons for leaving, the address of the new employer, the name  
16 of the supervisor and owner, and the work schedule if known. Respondent shall further notify the  
17 board in writing within 10 days of a change in name, residence address and mailing address, or  
18 phone number.

19       Failure to timely notify the board of any change in employer(s), name(s), address(es), or  
20 phone number(s) shall be considered a violation of probation.

21       **12. Tolling of Probation**

22       Except during periods of suspension, respondent shall, at all times while on probation, be  
23 employed as a pharmacy technician in California for a minimum of 40 hours per calendar month.  
24 Any month during which this minimum is not met shall toll the period of probation, i.e., the  
25 period of probation shall be extended by one month for each month during which this minimum is  
26 not met. During any such period of tolling of probation, respondent must nonetheless comply  
27 with all terms and conditions of probation.

28       Should respondent, regardless of residency, for any reason (including vacation) cease

1 working as a pharmacy technician for a minimum of 40 hours per calendar month in California,  
2 respondent must notify the board in writing within 10 days of cessation of work and must further  
3 notify the board in writing within 10 days of the resumption of the work. Any failure to provide  
4 such notification(s) shall be considered a violation of probation.

5 It is a violation of probation for respondent's probation to remain tolled pursuant to the  
6 provisions of this condition for a total period, counting consecutive and non-consecutive months,  
7 exceeding thirty-six (36) months.

8 "Cessation of work" means calendar month during which respondent is not  
9 working for at least 40 hours as a pharmacy technician, as defined in Business and  
10 Professions Code section 4115. "Resumption of work" means any calendar month  
11 during which respondent is working as a pharmacy technician for at least 40 hours as  
12 a pharmacy technician as defined by Business and Professions Code section 4115.

### 13 **13. Violation of Probation**

14 If a respondent has not complied with any term or condition of probation, the board shall  
15 have continuing jurisdiction over respondent, and probation shall automatically be extended, until  
16 all terms and conditions have been satisfied or the board has taken other action as deemed  
17 appropriate to treat the failure to comply as a violation of probation, to terminate probation, and  
18 to impose the penalty that was stayed.

19 If respondent violates probation in any respect, the board, after giving respondent notice  
20 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that  
21 was stayed. Notice and opportunity to be heard are not required for those provisions stating that a  
22 violation thereof may lead to automatic termination of the stay and/or revocation of the license. If  
23 a petition to revoke probation or an Accusation is filed against respondent during probation, the  
24 board shall have continuing jurisdiction, and the period of probation shall be automatically  
25 extended until the petition to revoke probation or Accusation is heard and decided.

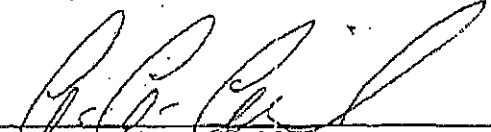
### 26 **14. Completion of Probation**

27 Upon written notice by the board indicating successful completion of probation,  
28 respondent's pharmacy technician license will be fully restored.

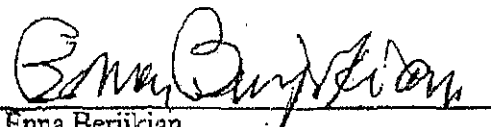
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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Enna Berjikian. I understand the stipulation and the effect it will have on my Pharmacy Technician Registration. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

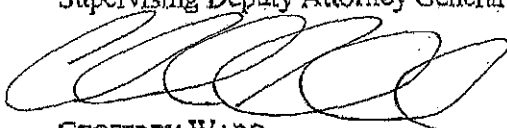
DATED: 07/25/12   
GRIGOR GILAVYAN  
Respondent

I have read and fully discussed with Respondent Grigor Gilavyan the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 7/25/12   
Enna Berjikian  
Attorney for Respondent

ENDORSEMENT

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

Dated: 7/26/12 Respectfully submitted,  
KAMALA D. HARRIS  
Attorney General of California  
KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
  
GEOFFREY WARD  
Deputy Attorney General  
Attorneys for Complainant

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**Exhibit A**

**First Amended Accusation.No. 3589**

1 KAMALA D. HARRIS  
Attorney General of California  
2 KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
3 GEOFF WARD  
Deputy Attorney General  
4 State Bar No. 246437  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2660  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**BOARD OF PHARMACY**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the First Amended Accusation  
11 Against:

Case No. 3589

12 **GRIGOR GILAVYAN**  
13 **535 E. Garfield Avenue, #2**  
14 **Glendale, CA 91205**  
**Pharmacy Technician Registration No. TCH**  
**67429**

**FIRST AMENDED ACCUSATION**

15 Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Virginia Herold (Complainant) brings this First Amended Accusation solely in her  
20 official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer  
21 Affairs.

22 2. On or about February 22, 2006, the Board of Pharmacy issued Pharmacy Technician  
23 Registration Number TCH 67429 to Grigor Gilavyan (Respondent). The Pharmacy Technician  
24 Registration was in full force and effect at all times relevant to the charges brought herein and  
25 will expire on August 31, 2013, unless renewed.

26 ///

27 ///

28 ///



1 substantially related to the qualifications, functions, and duties of a licensee under this  
2 chapter. A plea or verdict of guilty or a conviction following a plea of nolo  
3 contendere is deemed to be a conviction within the meaning of this provision. The  
4 board may take action when the time for appeal has elapsed, or the judgment of  
5 conviction has been affirmed on appeal or when an order granting probation is made  
6 suspending the imposition of sentence, irrespective of a subsequent order under  
7 Section 1203.4 of the Penal Code allowing the person to withdraw his or her plea of  
8 guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or  
9 dismissing the accusation, information, or indictment.”

6 **COST RECOVERY**

7 7. Section 125.3 of the Code provides, in pertinent part, that the Board, Registrar or  
8 Director may request the administrative law judge to direct a licentiate found to have committed a  
9 violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the  
10 investigation and enforcement of the case.

11 **FIRST CAUSE FOR DISCIPLINE**

12 **(Substantially Related Conviction)**

13 8. Respondent is subject to disciplinary action under section 490 and section 4301,  
14 subdivision (I) as a result of his conviction of a crime substantially related to the qualifications,  
15 functions, and duties of a registered pharmacy technician. On or about October 4, 2007, after  
16 pleading nolo contendere, Respondent was convicted of one misdemeanor count of violating  
17 Penal Code section 484, subdivision (a) [fraudulently appropriating property entrusted to him], in  
18 the criminal proceeding entitled *People v. Grigor Gilavyan* (Super. Ct. Los Angeles County,  
19 2007, No. 7GN04789). Respondent was placed on three years' probation and ordered to pay a  
20 fine. The underlying factual circumstances are as follows:

21 9. On or about July 6, 2007, Respondent was arrested at his place of employment, a  
22 Rite-Aid Pharmacy, after admitting to a police officer that he had stolen cash from the store's  
23 cash registers after scanning items as "returned". He also stated to the officer that he had stolen  
24 the manager's identification number and gained access to the store's computer system. Rite-Aid  
25 Loss Prevention personnel reported to the officer that Respondent had stolen a total of \$1,866.33  
26 from June 2, 2007, through June 27, 2007.

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**SECOND CAUSE FOR DISCIPLINE**

**(Unprofessional Conduct)**

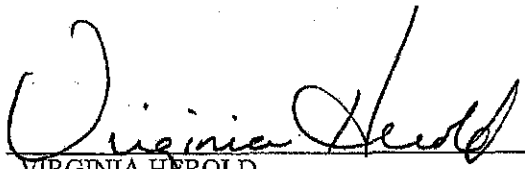
10. Respondent is subject to disciplinary action under section 4301, in that he engaged in unprofessional conduct by stealing cash from the pharmacy where he was employed. Complainant refers to and by this reference incorporates the allegations set forth above in paragraphs 8 through 9, inclusive, as though set forth fully.

**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 67429, issued to Grigor Gilavyan
2. Ordering Grigor Gilavyan 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;
3. Taking such other and further action as deemed necessary and proper.

DATED: 5/4/12

  
 VIRGINIA HEROLD  
 Executive Officer  
 Board of Pharmacy  
 Department of Consumer Affairs  
 State of California  
 Complainant

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