

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

In the Matter of the Accusation/Petition to Revoke
Probation Against:

**MEDRX, INC. DBA MEDRX PHARMACY,
IRENE NAYGAS, MARK NAYGAS AND
DMITRY NAYGAS, OWNERS**

18356 Oxnard St., Ste. 1
Tarzana, CA 91356
JULIE DAKOV, Pharmacist-in-Charge

Original Permit No. PHY 49209

and

IRENE NAYGAS
19120 Sprague Street
Tarzana, CA 91356

Original Pharmacist License No. RPH 58720

Case No. 5440

OAH No. 2016080645

**STIPULATED SURRENDER OF
LICENSE AND ORDER AS TO
RESPONDENT MEDRX, INC.
DBA MEDRX PHARMACY,
IRENE NAYGAS, MARK
NAYGAS AND DMITRY
NAYGAS, OWNERS ONLY (As to
Original Permit No. PHY 49209)**

Respondents.

DECISION AND ORDER

The attached Stipulated Surrender of License and 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 October 18, 2017.

It is so ORDERED on September 18, 2017.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA



By _____

Amy Gutierrez, Pharm.D.
Board President

1 XAVIER BECERRA
Attorney General of California
2 LINDA L. SUN
Supervising Deputy Attorney General
3 KEVIN J. RIGLEY
Deputy Attorney General
4 State Bar No. 131800
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 620-2558
6 Facsimile: (213) 897-2804
Attorneys for Complainant
7

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

11 In the Matter of the Accusation/Petition to
12 Revoke Probation Against:

Case No. 5440

13 **MEDRX, INC. DBA MEDRX**
PHARMACY, IRENE NAYGAS, MARK
14 **NAYGAS AND DMITRY NAYGAS,**
OWNERS

OAH No. 2016080645

15 18356 Oxnard St., Ste. 1
16 Tarzana, CA 91356
JULIE DAKOV, Pharmacist-in-Charge

STIPULATED SURRENDER OF
LICENSE AND ORDER AS TO
RESPONDENT MEDRX, INC. DBA
MEDRX PHARMACY, IRENE NAYGAS,
MARK NAYGAS AND DMITRY
NAYGAS, OWNERS ONLY (As to Original
Permit No. PHY 49209)

17 **Original Permit No. PHY 49209**

18 **IRENE NAYGAS**
19 19120 Sprague Street
Tarzana, CA 91356

20 **Original Pharmacist License No. RPH 58720**

21 Respondents.
22

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

25 PARTIES

26 1. Virginia Herold (Complainant) is the Executive Officer of the Board of Pharmacy
27 (Board). She brought this action solely in her official capacity and is represented in this matter by
28

1 Xavier Becerra, Attorney General of the State of California, by Kevin J. Rigley, Deputy Attorney
2 General.

3 2. MedRX, Inc., dba MedRX Pharmacy; Irene Naygas, Mark Naygas and Dmitry
4 Naygas, Owners (Respondent MedRX No. PHY 49209) is represented in this proceeding by
5 attorney Samuel P. Plunkett, whose address is 1522 W. Glenoaks Blvd., Ste. D, Glendale, CA
6 91201.

7 3. On or about September 30, 2008, the Board issued Pharmacy Permit No. PHY 49209
8 to MedRX, Inc., dba MedRX Pharmacy; Irene Naygas, Mark Naygas and Dmitry Naygas,
9 Owners (Respondent MedRX No. PHY 49209). The Pharmacy Permit was in full force and
10 effect at all times relevant to the charges brought in Accusation/Petition to Revoke Probation No.
11 5440 and will expire on September 1, 2017, unless renewed.

12 4. On or about September 8, 2006, the Board of Pharmacy issued Original Pharmacist
13 License Number RPH 58720 to Irene Naygas (Respondent Naygas). The Original Pharmacist
14 License, which was in full force and effect at all times relevant to the charges brought in
15 Accusation/Petition to Revoke Probation No. 5440, is currently suspended. The license will
16 expire on December 31, 2017, unless renewed.

17 JURISDICTION

18 5. Accusation/Petition to Revoke Probation No. 5440 was filed before the (Board), and
19 is currently pending against Respondents. The Accusation/Petition to Revoke Probation and all
20 other statutorily required documents were properly served on Respondent MedRX No. PHY
21 49209 on June 22, 2016. Respondent MedRX No. PHY 49209 timely filed its Notice of Defense
22 contesting the Accusation/Petition to Revoke Probation. A copy of Accusation/Petition to
23 Revoke Probation No. 5440 is attached as Exhibit A and incorporated by reference.

24 ADVISEMENT AND WAIVERS

25 6. Respondent MedRX No. PHY 49209 has carefully read, fully discussed with counsel,
26 and understands the charges and allegations in Accusation/Petition to Revoke Probation No.
27 5440. Respondent MedRX No. PHY 49209 also has carefully read, fully discussed with counsel,
28 and understands the effects of this Stipulated Surrender of License and Order.

1 If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and
2 Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible
3 in any legal action between the parties, and the Board shall not be disqualified from further action
4 by having considered this matter.

5 13. The parties understand and agree that Portable Document Format (PDF) and facsimile
6 copies of this Stipulated Surrender of License and Order, including Portable Document Format
7 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

8 14. This Stipulated Surrender of License and Order is intended by the parties to be an
9 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
10 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
11 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
12 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
13 executed by an authorized representative of each of the parties.

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

16 **ORDER**

17 IT IS HEREBY ORDERED that Pharmacy Permit No. PHY 49209, issued to Respondent
18 MedRX, Inc., dba MedRX Pharmacy; Irene Naygas, Mark Naygas and Dmitry Naygas, Owners,
19 is surrendered and accepted by the Board of Pharmacy.

20 1. The surrender of Respondent MedRX No. PHY 49209's Pharmacy Permit and the
21 acceptance of the surrendered license by the Board shall constitute the imposition of discipline
22 against Respondent MedRX No. PHY 49209. This stipulation constitutes a record of the
23 discipline and shall become a part of Respondent MedRX No. PHY 49209's license history with
24 the Board of Pharmacy.

25 2. Respondent MedRX No. PHY 49209 shall lose all rights and privileges as a licensed
26 pharmacy in California as of the effective date of the Board's Decision and Order.

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1 I voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
2 Board of Pharmacy.

3 DATED: *12/17/19*

4
5
6 MEDRX, INC. DBA MEDRX PHARMACY NO.
7 ID# 49209, IRENE NAYGAS, MARK NAYGAS
8 AND DMITRY NAYGAS, OWNERS
9 Respondent MEDRX No. ID# 49209

10 I have read and fully discussed with Respondent MEDRX, Inc. dba MEDRX Pharmacy,
11 Irene Naygas, Mark Naygas and Dmitry Naygas, Owners the terms and conditions and other
12 matters contained in this Stipulated Surrender of License and Order. I approve its form and
13 content.

14 DATED: _____

15 SAMUEL P. BLUNKETT
16 Attorney for Respondent

17 ENDORSEMENT

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

20 Dated: _____

21 Respectfully submitted,

22 XAVIER ESCOBAR
23 Attorney General of California
24 LINDA J. SUS
25 Supervising Deputy Attorney General

26 KEVIN J. RIGLEY
27 Deputy Attorney General
28 Attorney for Complainant

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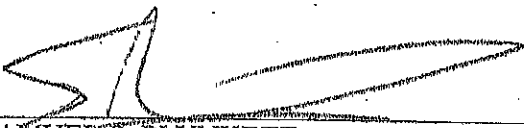
1 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
2 Board of Pharmacy.

3
4 DATED: _____

5 MEDRX, INC., DBA MEDRX PHARMACY NO.
6 PHY 49209; IRENE NAYGAS, MARK NAYGAS
7 AND DMITRY NAYGAS, OWNERS
8 *Respondent MedRX No. PHY 49209*

9 I have read and fully discussed with Respondent MedRX, Inc., dba MedRX Pharmacy;
10 Irene Naygas, Mark Naygas and Dmitry Naygas, Owners the terms and conditions and other
11 matters contained in this Stipulated Surrender of License and Order. I approve its form and
12 content.

13 DATED: July 3, 2017

14 
15 SAMUEL P. PLUNKETT
16 *Attorney for Respondent*

17 ENDORSEMENT

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

20 Dated:

Respectfully submitted,

21 XAVIER BECERRA
22 Attorney General of California
23 LINDA L. SUN
24 Supervising Deputy Attorney General

25 KEVIN J. RIGLEY
26 Deputy Attorney General
27 *Attorneys for Complainant*

28 LA2015500870
52518123

1 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
2 Board of Pharmacy.

3
4 DATED: _____

MEDRX, INC., DBA MEDRX PHARMACY NO.
PHY 49209; IRENE NAYGAS, MARK NAYGAS
AND DMITRY NAYGAS, OWNERS
Respondent MedRX No. PHY 49209

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6
7
8 I have read and fully discussed with Respondent MedRX, Inc., dba MedRX Pharmacy;
9 Irene Naygas, Mark Naygas and Dmitry Naygas, Owners the terms and conditions and other
10 matters contained in this Stipulated Surrender of License and Order. I approve its form and
11 content.

12
13 DATED: _____

SAMUEL P. PLUNKETT
Attorney for Respondent

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17 ENDORSEMENT

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

20 Dated: 7/3/17

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
LINDA L. SUN
Supervising Deputy Attorney General

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KEVIN J. RIGLEY
Deputy Attorney General
Attorneys for Complainant

LA2015500870
52518123

Exhibit A

Accusation/Petition to Revoke Probation No. 5440
