

1 KAMALA D. HARRIS
Attorney General of California
2 LINDA K. SCHNEIDER
Senior Assistant Attorney General
3 MARC D. GREENBAUM
Supervising Deputy Attorney General
4 State Bar No. 138213
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2579
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 Accusation Against:

Case No. 5751

11 **OLGA YEGIAZARYAN**
12 **7813 Via Genova**
13 **Burbank, CA 91504**

A C C U S A T I O N

14 **Pharmacist License No. RPH 55786**

15 Respondent.

16
17 Complainant alleges:

18 PARTIES

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

21 2. On or about July 26, 2004, the Board of Pharmacy issued Pharmacist License
22 Number RPH 55786 to Olga Yegiazaryan (Respondent). The Pharmacist License was in full
23 force and effect at all times relevant to the charges brought in this Accusation and will expire on
24 March 31, 2018, unless renewed.

25 JURISDICTION

26 3. This Accusation is brought before the Board of Pharmacy (Board), Department of
27 Consumer Affairs, under the authority of the following laws. All section references are to the
28 Business and Professions Code unless otherwise indicated.

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

4 BACKGROUND

5 9. On or about March 17, 2014, an officer from the Burbank Police Department
6 responded to a donut shop regarding a report of an assault. The responding officer spoke with a
7 man (victim) who was wearing a ripped shirt and had minor cuts to his left nipple and left
8 forearm. He told the officers that Respondent, his ex-girlfriend, approached him in front of the
9 donut shop and began cutting his shirt with a box cutter. The victim was able to run into the
10 donut shop and held the door shut preventing Respondent from entering. Respondent then
11 approached the victim's car and appeared to make slice marks with the box cutter on one of the
12 tires. Respondent left the area before police arrived. On about April 7, 2014, the Los Angeles
13 County Superior Court issued an arrest warrant for Respondent.

14 10. On or about August 21, 2014, in a criminal proceeding entitled *The People of the*
15 *State of California v. Olga Yegiazaryan*, in the Los Angeles County Superior Court (Burbank
16 Courthouse), Case No. GA092841, Respondent, based on her plea of no contest, was convicted of
17 injuring a spouse, cohabitant, fiancé, boyfriend, girlfriend or child's parent (Pen. Code, § 273.5,
18 subd. (a)), a felony; and an enhancement charge of using a deadly and dangerous weapon, to wit,
19 a box cutter (Pen. Code, § 12022, subd. (b)(1)). The court sentenced Respondent to three years of
20 probation with various conditions, including attending a 52-week domestic violence counseling
21 program and paying various fines and fees.

22
23 **FIRST CAUSE FOR DISCIPLINE**
24 **(Unprofessional Conduct—Acts Involving Moral Turpitude)**
(Bus. & Prof. Code, § 4301, subd. (f))

25 11. Respondent has subjected her pharmacist license to disciplinary action under section
26 4301, subdivision (f), in that, on or about March 17, 2014, she engaged in acts involving moral
27 turpitude. The circumstances are more fully explained in paragraph 9, above.

28 ///

1 **SECOND CAUSE FOR DISCIPLINE**
2 **(Unprofessional Conduct—Conviction)**
3 **(Bus. & Prof. Code, § 4301, subd. (l))**

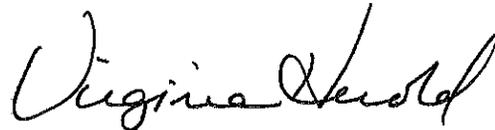
4 12. Respondent has subjected her pharmacist license to disciplinary action under section
5 4301, subdivision (l), for engaging in unprofessional conduct in that, on or about August 21,
6 2014, she was convicted of a crime substantially related to the qualifications, functions, or duties
7 of a pharmacist. The conviction is explained in paragraph 10, above.

8 PRAYER

9 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this
10 Accusation, and that following the hearing, the Board of Pharmacy issue a decision:

- 11 1. Revoking or suspending Pharmacist License Number RPH 55786, issued to Olga
12 Yegiazaryan;
- 13 2. Ordering Olga Yegiazaryan to pay the Board of Pharmacy the reasonable costs of the
14 investigation and enforcement of this case, pursuant to Business and Professions Code section
15 125.3;
- 16 3. Taking such other and further action as deemed necessary and proper.

17
18
19 DATED: 7/19/16



20 VIRGINIA HEROLD
21 Executive Officer
22 Board of Pharmacy
23 Department of Consumer Affairs
24 State of California
25 *Complainant*

26 LA2016600820
27 52146247.docx
28