

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

In the Matter of the Accusation Against:

Case No. 3637

**KEVIN TER-GRIGORYAN AKA KEVIN
TERGRIGORYAN**

1795 Harding Ave.
Altadena, CA 91001

Pharmacy Technician Registration No. TCH
84200

Respondent.

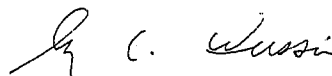
DECISION AND ORDER

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 on May 11, 2011.

It is so ORDERED April 11, 2011.

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 MARC D. GREENBAUM
 Supervising Deputy Attorney General
 3 SHAWN P. COOK
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 Attorneys for Complainant
 7

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

11 In the Matter of the Accusation Against:

Case No. 3637

12 **KEVIN TER-GRIGORYAN AKA KEVIN**
TERGRIGORYAN
 13 1795 Harding Ave.
 Altadena, CA 91001

OAH No. L-2010080909

STIPULATED SURRENDER OF
LICENSE AND ORDER

15 Pharmacy Technician License No. TCH
 84200

16 Respondent.
 17

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
 19 proceeding 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 Shawn P. Cook, Deputy Attorney
 24 General.

25 2. Kevin Ter-Grigoryan aka Kevin Tergrigoryan (Respondent) is represented in this
 26 proceeding by attorney Fred G. Minassian, Esq., whose address is 3435 Wilshire Boulevard
 27 Suite 2180; Los Angeles, CA 90010.
 28

1 3. On or about June 30, 2008, the Board of Pharmacy issued Pharmacy Technician
2 License No. TCH 84200 to Kevin Ter-Grigoryan aka Kevin Tergrigoryan (Respondent). The
3 Pharmacy Technician License was in full force and effect at all times relevant to the charges
4 brought in Accusation No. 3637 and will expire on July 31, 2011, unless renewed.

5 JURISDICTION

6 4. Accusation No. 3637 was filed before the Board of Pharmacy (Board), Department of
7 Consumer Affairs, and is currently pending against Respondent. The Accusation and all other
8 statutorily required documents were properly served on Respondent on June 24, 2010.
9 Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation
10 No. 3637 is attached as Exhibit A and incorporated by reference.

11 ADVISEMENT AND WAIVERS

12 5. Respondent has carefully read, fully discussed with counsel, and understands the
13 charges and allegations in Accusation No. 3637. Respondent also has carefully read, fully
14 discussed with counsel, and understands the effects of this Stipulated Surrender of License and
15 Order.

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

23 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
24 every right set forth above.

25 CULPABILITY

26 8. Respondent admits the truth of each and every charge and allegation in Accusation
27 No. 3637, agrees that cause exists for discipline and hereby surrenders his Pharmacy Technician
28 License No. TCH 84200 for the Board's formal acceptance.

1 9. Respondent understands that by signing this stipulation he enables the Board to issue
2 an order accepting the surrender of his Pharmacy Technician License without further process.

3 RESERVATION

4 10. The admissions made by Respondent herein are only for the purposes of this
5 proceeding, or any other proceedings in which the Board of Pharmacy or other professional
6 licensing agency is involved, and shall not be admissible in any other criminal or civil
7 proceeding.

8 CONTINGENCY

9 11. This stipulation shall be subject to approval by the Board of Pharmacy. Respondent
10 understands and agrees that counsel for Complainant and the staff of the Board of Pharmacy may
11 communicate directly with the Board regarding this stipulation and surrender, without notice to or
12 participation by Respondent or his counsel. By signing the stipulation, Respondent understands
13 and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the
14 time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its
15 Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or
16 effect, except for this paragraph, it shall be inadmissible in any legal action between the parties,
17 and the Board shall not be disqualified from further action by having considered this matter.

18 12. The parties understand and agree that facsimile copies of this Stipulated Surrender of
19 License and Order, including facsimile signatures thereto, shall have the same force and effect as
20 the originals.

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

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

ORDER

1
2 IT IS HEREBY ORDERED that Pharmacy Technician License No. TCH 84200, issued to
3 Respondent Kevin Ter-Grigoryan aka Kevin Tergrigoryan, is surrendered and accepted by the
4 Board of Pharmacy. Respondent shall relinquish his or her technician license to the board
5 within ten (10) days of the effective date of this decision. Respondent may not reapply or petition
6 the board for reinstatement of his or her revoked technician license for three (3) years from the
7 effective date of this decision.

8 15. The surrender of Respondent's Pharmacy Technician License and the acceptance of
9 the surrendered license by the Board shall constitute the imposition of discipline against
10 Respondent. This stipulation constitutes a record of the discipline and shall become a part of
11 Respondent's license history with the Board.

12 16. Respondent shall lose all rights and privileges as a pharmacy technician in California
13 as of the effective date of the Board's Decision and Order.

14 17. Respondent shall cause to be delivered to the Board his wall license certificate, if one
15 was issued, and his pocket license on or before the effective date of the Decision and Order.

16 18. If Respondent ever files an application for licensure or a petition for reinstatement in
17 the State of California, the Board shall treat it as a new application for licensure. Respondent
18 must comply with all the laws, regulations and procedures for reinstatement of a revoked license
19 in effect at the time the petition is filed, and all of the charges and allegations contained in
20 Accusation No. 3637 shall be deemed to be true, correct and admitted by Respondent when the
21 Board determines whether to grant or deny the petition.

22 19. If Respondent should ever apply or reapply for a new license or certification, or
23 petition for reinstatement of a license, by any other health care licensing agency in the State of
24 California, all of the charges and allegations contained in Accusation, No. 3637 shall be deemed
25 to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any
26 other proceeding seeking to deny or restrict licensure.

27 20. Respondent shall pay the Board its costs of investigation and enforcement in the
28 amount of \$3,490.00 prior to issuance of a new or reinstated license.

ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney, Fred G. Minassian, Esq.. I understand the stipulation and the effect it will have on my Pharmacy Technician License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: 2/2/11

KEVIN TER-GRIGORYAN AKA KEVIN TERGRIGORYAN
Respondent

I have read and fully discussed with Respondent Kevin Ter-Grigoryan aka Kevin Tergrigoryan the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: 1/28/11

FRED G. MINASSIAN, ESQ.
Attorney for Respondent

ENDORSEMENT

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

Dated: 2/4/11

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
MARC D. GREENBAUM
Supervising Deputy Attorney General

SHAWN P. COOK
Deputy Attorney General
Attorneys for Complainant

Exhibit A
Accusation No. 3637

1 EDMUND G. BROWN JR.
Attorney General of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 SHAWN P. COOK
Deputy Attorney General
4 State Bar No. 117851
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-9954
6 Facsimile: (213) 897-2804
Attorneys for Complainant

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

10 In the Matter of the Accusation Against:

Case No. 3637

11 **KEVIN TER-GRIGORYAN AKA KEVIN**
12 **TERGRIGORYAN**
1795 Harding Ave.
13 Altadena, CA 91001
Pharmacy Technician License No. TCH
14 84200

A C C U S A T I O N

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 June 30, 2008, the Board of Pharmacy issued Pharmacy Technician
22 License Number TCH 84200 to Kevin Ter-Grigoryan aka Kevin Tergrigoryan (Respondent). The
23 Pharmacy Technician License was in full force and effect at all times relevant to the charges
24 brought herein and will expire on July 31, 2011, 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.

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4. California Code of Regulations, title 16, section 1770, states:

"For the purpose of denial, suspension, or revocation of a personal or facility license pursuant to Division 1.5 (commencing with Section 475) of the Business and Professions Code, a crime or act shall be considered substantially related to the qualifications, functions or duties of a licensee or registrant if to a substantial degree it evidences present or potential unfitness of a licensee or registrant to perform the functions authorized by his license or registration in a manner consistent with the public health, safety, or welfare."

5. Section 4300 of the Code states:

"(a) Every license issued may be suspended or revoked.

"(b) The board shall discipline the holder of any license issued by the board, whose default has been entered or whose case has been heard by the board and found guilty, by any of the following methods:

"(1) Suspending judgment.

"(2) Placing him or her upon probation.

"(3) Suspending his or her right to practice for a period not exceeding one year.

"(4) Revoking his or her license.

"(5) Taking any other action in relation to disciplining him or her as the board in its discretion may deem proper.

"(c) The board may refuse a license to any applicant guilty of unprofessional conduct. The board may, in its sole discretion, issue a probationary license to any applicant for a license who is guilty of unprofessional conduct and who has met all other requirements for licensure. The board may issue the license subject to any terms or conditions not contrary to public policy, including, but not limited to, the following:

"(1) Medical or psychiatric evaluation.

"(2) Continuing medical or psychiatric treatment.

"(3) Restriction of type or circumstances of practice.

"(4) Continuing participation in a board-approved rehabilitation program.

1 "(5) Abstention from the use of alcohol or drugs.

2 "(6) Random fluid testing for alcohol or drugs.

3 "(7) Compliance with laws and regulations governing the practice of pharmacy.

4 "(d) The board may initiate disciplinary proceedings to revoke or suspend any probationary
5 certificate of licensure for any violation of the terms and conditions of probation. Upon
6 satisfactory completion of probation, the board shall convert the probationary certificate to a
7 regular certificate, free of conditions.

8 "(e) The proceedings under this article shall be conducted in accordance with Chapter 5
9 (commencing with Section 11500) of Part 1 of Division 3 of the Government Code, and the board
10 shall have all the powers granted therein. The action shall be final, except that the propriety of
11 the action is subject to review by the superior court pursuant to Section 1094.5 of the Code of
12 Civil Procedure."

13 6. Section 4301 of the Code states:

14 "The board shall take action against any holder of a license who is guilty of unprofessional
15 conduct or whose license has been procured by fraud or misrepresentation or issued by mistake.
16 Unprofessional conduct shall include, but is not limited to, any of the following:

17 "(h) The administering to oneself, of any controlled substance, or the use of any dangerous
18 drug or of alcoholic beverages to the extent or in a manner as to be dangerous or injurious to
19 oneself, to a person holding a license under this chapter, or to any other person or to the public, or
20 to the extent that the use impairs the ability of the person to conduct with safety to the public the
21 practice authorized by the license.

22 * * *

23 "(j) The violation of any of the statutes of this state, or any other state, or of the United
24 States regulating controlled substances and dangerous drugs.

25 "(k) The conviction of more than one misdemeanor or any felony involving the use,
26 consumption, or self-administration of any dangerous drug or alcoholic beverage, or any
27 combination of those substances.

28

1 "(l) The conviction of a crime substantially related to the qualifications, functions, and
2 duties of a licensee under this chapter. The record of conviction of a violation of Chapter 13
3 (commencing with Section 801) of Title 21 of the United States Code regulating controlled
4 substances or of a violation of the statutes of this state regulating controlled substances or
5 dangerous drugs shall be conclusive evidence of unprofessional conduct. In all other cases, the
6 record of conviction shall be conclusive evidence only of the fact that the conviction occurred.
7 The board may inquire into the circumstances surrounding the commission of the crime, in order
8 to fix the degree of discipline or, in the case of a conviction not involving controlled substances
9 or dangerous drugs, to determine if the conviction is of an offense substantially related to the
10 qualifications, functions, and duties of a licensee under this chapter. A plea or verdict of guilty or
11 a conviction following a plea of nolo contendere is deemed to be a conviction within the meaning
12 of this provision. The board may take action when the time for appeal has elapsed, or the
13 judgment of conviction has been affirmed on appeal or when an order granting probation is made
14 suspending the imposition of sentence, irrespective of a subsequent order under Section 1203.4 of
15 the Penal Code allowing the person to withdraw his or her plea of guilty and to enter a plea of not
16 guilty, or setting aside the verdict of guilty, or dismissing the accusation, information, or
17 indictment.

18 * * *

19 "(p) Actions or conduct that would have warranted denial of a license.

20 7. Section 4022 of the Code states in pertinent part:

21 "Dangerous drug" or "dangerous device" means any drug or device unsafe for self-use in
22 humans or animals, and includes the following:

23 "(a) Any drug that bears the legend: "Caution: federal law prohibits dispensing without
24 prescription," "Rx only," or words of similar import.

25

26 "(c) Any other drug or device that by federal or state law can be lawfully dispensed only on
27 prescription or furnished pursuant to Section 4006."

28 8. Section 4051 of the Code states:

1 "(a) Except as otherwise provided in this chapter, it is unlawful for any person to
2 manufacture, compound, furnish, sell, or dispense any dangerous drug or dangerous device, or to
3 dispense or compound any prescription pursuant to Section 4040 of a prescriber unless he or she
4 is a pharmacist under this chapter.

5 9. Section 4059, subd. (a) of the Code states, in pertinent part, that a person may not
6 furnish any dangerous drug except upon the prescription of a physician, dentist, podiatrist,
7 optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7. A person may not
8 furnish any dangerous device, except upon the prescription of a physician, dentist, podiatrist,
9 optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7.

10 10. Section 4060 of the Code provides in pertinent part: "No person shall possess any
11 controlled substance, except that furnished to a person upon the prescription of a physician,
12 dentist, podiatrist, or veterinarian, or furnished pursuant to a drug order issued by a certified
13 nurse-midwife, . . . a nurse practitioner. . . , or a physician assistant. . ."

14 11. Section 4324 of the Code states:

15 "(a) Every person who signs the name of another, or of a fictitious person, or falsely makes,
16 alters, forges, utters, publishes, passes, or attempts to pass, as genuine, any prescription for any
17 drugs is guilty of forgery and upon conviction thereof shall be punished by imprisonment in the
18 state prison, or by imprisonment in the county jail for not more than one year.

19 "(b) Every person who has in his or her possession any drugs secured by a forged
20 prescription shall be punished by imprisonment in the state prison, or by imprisonment in the
21 county jail for not more than one year."

22 12. Health and Safety Code section 11170, states: "No person shall prescribe, administer,
23 or furnish a controlled substance for himself."

24 13. Health and Safety Code section 11173, subd. (a) provides that no person shall obtain
25 or attempt to obtain controlled substances, or procure or attempt to procure the administration of
26 or prescription for controlled substances, (1) by fraud, deceit, misrepresentation, or subterfuge; or
27 (2) by the concealment of a material fact.

28 ///

1 14. Section 125.3 of the Code states, in pertinent part, that the Board may request the
2 administrative law judge to direct a licentiate found to have committed a violation or violations of
3 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
4 enforcement of the case.

5 15. Section 118, subdivision (b), of the Code provides that the
6 suspension/expiration/surrender/cancellation of a license shall not deprive the
7 Board/Registrar/Director of jurisdiction to proceed with a disciplinary action during the period
8 within which the license may be renewed, restored, reissued or reinstated.

9 16. Section 480 states, in pertinent part:

10 "(a) A board may deny a license regulated by this code on the grounds that the applicant has
11 one of the following:

12 "(1) Been convicted of a crime. A conviction within the meaning of this section
13 means a plea or verdict of guilty or a conviction following a plea of nolo contendere.
14 Any action which a board is permitted to take following the establishment of a
15 conviction may be taken when the time for appeal has elapsed, or the judgment of
16 conviction has been affirmed on appeal, or when an order granting probation is made
17 suspending the imposition of sentence, irrespective of a subsequent order under the
18 provisions of Section 1203.4 of the Penal Code.

19 * * *

20 "(3) Done any act which if done by a licentiate of the business or profession in
21 question, would be grounds for suspension or revocation of license.

22 "The board may deny a license pursuant to this subdivision only if the crime or
23 act is substantially related to the qualifications, functions or duties of the business or
24 profession for which application is made."

25 17. Section 490 of the Code provides, in pertinent part, that a board may suspend or
26 revoke a license on the ground that the licensee has been convicted of a crime substantially
27 related to the qualifications, functions, or duties of the business or profession for which the
28 license was issued.

1 18. Section 493 of the Code states:

2 "Notwithstanding any other provision of law, in a proceeding conducted by a board within
3 the department pursuant to law to deny an application for a license or to suspend or revoke a
4 license or otherwise take disciplinary action against a person who holds a license, upon the
5 ground that the applicant or the licensee has been convicted of a crime substantially related to the
6 qualifications, functions, and duties of the licensee in question, the record of conviction of the
7 crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact,
8 and the board may inquire into the circumstances surrounding the commission of the crime in
9 order to fix the degree of discipline or to determine if the conviction is substantially related to the
10 qualifications, functions, and duties of the licensee in question.

11 "As used in this section, 'license' includes 'certificate,' 'permit,' 'authority,' and
12 'registration.'"

13 CONTROLLED SUBSTANCES AND DANGEROUS DRUGS

14 A. "Vicodin" is a Schedule III controlled substance as defined in Health and Safety Code
15 section 11056, subdivision (b)(4), and is categorized as a dangerous drug according to Business
16 and Professions Code section 4022.

17 B. "Alprazolam", generic for Xanax, is an anti-anxiety benzodiazepine and is a Schedule
18 IV controlled substance as designated by Health and Safety Code section 11057(d)(1) and is
19 categorized as a dangerous drug pursuant to section 4022 of the Code.

20 C. "Cocaine" is a "narcotic drug" as categorized by Health and Safety Code sec. 11019,
21 subd. (e) and is a Schedule II controlled substance as designated by Health and Safety Code sec.
22 11055, subd. (b)(6).

23 D. "Seroquel" is an antipsychotic drug used to treat schizophrenia and anti-anxiety and
24 is categorized as a dangerous drug according to Business and Professions Code section 4022
25 since it requires a prescription under federal law.

26 E. "Sildenafil Citrate" generic for "Viagra" is a drug used to treat erectile dysfunction
27 and pulmonary arterial hypertension and is categorized as a dangerous drug according to
28 Business and Professions Code section 4022 since it requires a prescription under federal law.

1 FIRST CAUSE FOR DISCIPLINE

2 (Use of Dangerous Drugs or Alcohol)

3 19. Respondent is subject to disciplinary action under sections 4300, 4301, subdivisions
4 (h) and 480, subd. (a)(3) in conjunction with California Code of Regulations sec. subd. (j) in
5 conjunction with Health and Safety Code section 11170 for administering controlled substances
6 to himself, or the use of alcohol or dangerous drugs to an extent or in a manner that was injurious
7 to himself or others. The circumstances are as follows:

8 20. On or about September 7, 2008 at 1240 a.m., Respondent was arrested by the
9 Pasadena Police Department for violation of Vehicle Code Section 23152, subd. (a) [driving
10 while under the influence] after officers observed him parked and sitting in the drivers seat of a
11 black, BMW 328i, with the engine running and a female passenger seated next to him. Officers
12 formed the opinion based on their observations and field sobriety exam that Respondent was
13 under the influence of alcohol. Respondent was arrested and administered a breathalyzer exam at
14 the police department jail with test results of .12 and .13%.

15 21. On or about December 14, 2008, Respondent was arrested by the Beverly Hills Police
16 Department for violation of Health and Safety Code section 11350 subd. (a) [possession of
17 narcotic controlled substance] and Health and Safety Code section 11375 subd. (b)(2) [possession
18 of controlled substance without a prescription], after officers received a tip from an unidentified
19 informant that a male was "snorting cocaine" in a Mercedes outside the Cafe Roma. Officers
20 investigated and observed Respondent exit a Mercedes with heavily tinted windows that
21 prevented them from observing inside. Respondent voluntarily submitted to a search of his
22 person which revealed a bindle containing a fine, white, powdery substance.

23 22. Respondent admitted that the powder was cocaine and that it belonged to him. A
24 subsequent search revealed that Respondent was in possession of four controlled substances:
25 Xanax, Vicodin, Seroquel, and Viagra. Respondent was unable to produce a prescription for any
26 of the controlled substances and claimed he took Xanax for an "anxiety disorder" and that he had
27 no plans to take the other drugs and carried them because various people had given them to him.

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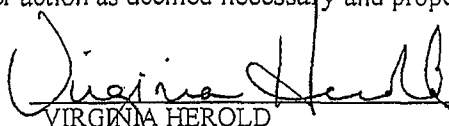
WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Pharmacy issue a decision:

1. Revoking or suspending Pharmacy Technician License Number TCH 84200, issued to Kevin Ter-Grigoryan aka Kevin Tergrigoryan Kevin Ter-Grigoryan.

2. Ordering Kevin Ter-Grigoryan 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: 5/28/10



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

LA2010501680
accusation.rtf