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

In the Matter of the Accusation Against:

Case No. 4919

LIZA J. ANTRANIK AKA LIZA J. ISKENDERIAN 10230 Cozycoft Ave. Chatsworth, CA 91311 Pharmacist License No. RPH 51006

Respondent.

#### **DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary 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 June 7, 2017.

It is so ORDERED on May 8, 2017.

BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

By

Amy Gutierrez, Pharm.D. Board President

· 1	XAVIER BECERRA					
2	Attorney General of California ARMANDO ZAMBRANO					
3	Supervising Deputy Attorney General LANGSTON M. EDWARDS					
4	Deputy Attorney General State Bar No. 237926					
	300 So. Spring Street, Suite 1702					
5	Los Angeles, CA 90013 Telephone: (213) 620-6343					
6	Facsimile: (213) 897-2804 Attorneys for Complainant					
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8.	BEFORE THE BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA					
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11	In the Matter of the Accusation Against: Case No. 4919					
12	LIZA J. ANTRANIK AKA LIZA J. ISKENDERIAN OAH No. 2016021038 STIPLL ATED SETTLEMENT AND					
13	10230 Cozycoft Ave.  DISCIPLINARY ORDER FOR PUBLIC					
	Chatsworth, CA 91311 Pharmacist License No. RPH 51006  REPROVAL					
14 15	Respondent. [Bus. & Prof. Code § 495]					
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18	TO 16 THEN EDAY COUNTY A STEEL AND A CONTROL					
	IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-					
19	entitled proceedings that the following matters are true:					
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21	PARTIES					
22	1. Virginia Herold (Complainant) is the Executive Officer of the Board of Pharmacy					
23	(Board). She brought this action solely in her official capacity and is represented in this matter by					
24	Xavier Becerra, Attorney General of the State of California, by Langston M. Edwards, Deputy					
25	Attorney General.					
26	2. Respondent Liza J. Antranik aka Liza J. Iskenderian (Respondent) is represented in					
27	this proceeding by attorney Ronald Marks, whose address is: Ronald S. Marks, A Professional					
28	and processing of accountry recorded relations, whose address is. Rolland 5. Iviaires, A Professional					
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Law Corporation, Westlake Corporate Plaza, 2625 Townsgate Road, Suite 330, Westlake Village, California 91361.

### **JURISDICTION**

- 3. On or about November 16, 1999, the Board issued Pharmacist License No. RPH 51006 to Respondent. The Pharmacist License was in full force and effect at all times relevant to the charges brought in Accusation No. 4919 and will expire on September 30, 2017, unless renewed.
- 4. Accusation No. 4919 was filed before the Board of Pharmacy (Board), Department of Consumer Affairs and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on January 14, 2016. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 4919 is attached as Exhibit A and incorporated herein by reference.

### ADVISEMENT AND WAIVERS

- 5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 4919. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order for Public Reproval.
- 6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.
- 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

#### **CULPABILITY**

- 8. Respondent understands and agrees that the charges and allegations in Accusation No. 4919, if proven at hearing, constitute cause for imposing discipline upon her Pharmacy License.
- 9. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the charges in the Accusation, and that Respondent hereby gives up her right to contest those charges.
- 10. Respondent agrees that her Pharmacist License is subject to discipline and she agrees to be bound by the Disciplinary Order below.

#### CONTINGENCY

- 11. This stipulation shall be subject to approval by the Board of Pharmacy. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Pharmacy may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order for Public Reproval shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.
- 12. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Settlement and Disciplinary Order for Public Reproval, including Portable Document Format (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.
- 13. This Stipulated Settlement and Disciplinary Order for Public Reproval is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment

Aram Iskenderlan

(818) 349-9058

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<u>ACCEPTANCE</u>

I have carefully read the above Stipulated Settlement and Disciplinary Order for Public Reproval and have fully discussed it with my attorney, Ronald Marks. I understand the stipulation and the affect it will have on my Pharmacist License. I enter into this Stipulated Settlement and Disciplinary Order for Public Reproval voluntarity, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: 2 - 28 - 17

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LIZA I. ANTRANIK

Respondent

I have read and fully discussed with Respondent Liza I. Antranik the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order for Public Reproval. I approve its form and content.

DATED: 2/28//7

KONALD MARKS Attorney for Respondent

### **ENDORSEMENT**

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

Dated: February 28, 2017

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Respectfully submitted,

XAVIER BECERRA Attorney General of California ARMANDO ZAMBRANO Supervising Deputy Attorney General

LANGSTON M. EDWARDS Deputy Attorney General Attorneys for Complainant

LA2013510459 Antranik Public Reproval docx.docx

Exhibit A

Accusation No. 4919

1 2 3 4 5 6 7 8 9	KAMALA D. HARRIS Attorney General of California ARMANDO ZAMBRANO Supervising Deputy Attorney General NANCY A. KAISER Deputy Attorney General State Bar No. 192083 300 So. Spring Street, Suite 1702 Los Angeles, CA 90013 Telephone: (213) 897-5794 Facsimile: (213) 897-2804 Attorneys for Complainant  BEFORE THE BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA				
11	In the Matter of the Acquisation Against: Case No. 4919				
12	LIZA J. ANTRANIK				
13	AKA LIZA J. ISKENDERÍÁN 10230 Cozycoft Áve. A C C U S A T I O N				
14	Chatsworth, CA 91311				
15	Pharmacist License No. RPII 51006				
16	ånd				
17	RANA HOÖRFAR AKA RANA HEIDARI				
18	5807 Topanga Canyon Blvd. #K102 Woodland Hills, CA 91367				
19	Pharinacy Technician License No. TCH				
20	98206				
21	Réspondents,				
22					
23	Complainant allegés:				
24	PARTIES				
25	1. Virginia Herold (Complainant) brings this Accusation solely in her official capacity				
26	as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs.				
27	2. On or about November 16, 1999, the Board of Pharmacy issued Pharmacist License				
28	Number RPH 51006 to Liza J. Antranik aka Liza J. Iskenderlan (Respondent Antranik). 'The				
	1				
	ACCUSATION				

Pharmacist License was in full force and effect at all times relevant to the charges brought herein and will expire on September 30, 2017, unless renewed.

3. On or about May 6, 2010, the Board of Pharmacy issued Pharmacy Technician Registration Number TCH 98206 to Rana Hoorfar aka Rana Heidari (Respondent Hoorfar). The Pharmacy Technician Registration was in full force and effect at all times relevant to the charges brought herein and will expire on July 31, 2017, unless renewed.

### JURISDICTION

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

### STATUTORY PROVISIONS

- 5. Section 477 states, in part: "As used in this division: . . . (b) 'License' includes certificate, registration or other means to engage in a business or profession regulated by this code."
- 6. Section 4300 states, in pertinent part, that "[e]very license issued may be suspended or revoked."
  - 7. Section 4300.1 of the Code states:

"The expiration, cancellation, forfeiture, or suspension of a board-issued license by operation of law or by order or decision of the board or a court of law, the placement of a license on a retired status, or the voluntary surrender of a license by a licensee shall not deprive the board of jurisdiction to commence or proceed with any investigation of, or action or disciplinary proceeding against, the licensee or to render a decision suspending or revoking the license."

8. Section 4301 of the Code states:

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

"(f) The commission of any act involving moral turpitude, dishonesty, fraud, deceit, or corruption, whether the act is committed in the course of relations as a licensee or otherwise, and whether the act is a felony or misdemeanor or not.

"(g) Knowingly making or signing any certificate or other document that falsely represents the existence or nonexistence of a state of facts.

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

"(o) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of or conspiring to violate any provision or term of this chapter or of the applicable federal and state laws and regulations governing pharmacy, including regulations established by the board or by any other state or federal regulatory agency."

#### 9. Section 4060 of the Code states:

"No person shall possess any controlled substance, except that furnished to a person upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7, or furnished pursuant to a drug order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse practitioner pursuant to Section 2836.1, or a physician assistant pursuant to Section 3502.1, or naturopathic doctor pursuant to Section 3640.5, or a pharmacist pursuant to either subparagraph (D) of paragraph (4) of, or clause (iv) of subparagraph (A) of paragraph (5) of, subdivision (a) of Section 4052. This section shall not apply to the possession of any controlled substance by a manufacturer, wholesaler, pharmacy, pharmacist, physician, podiatrist, dentist, optometrist, veterinarian, naturopathic doctor, certified nurse-midwife, nurse practitioner, or physician assistant, when in stock in containers correctly labeled with the name and address of the supplier or producer.

"Nothing in this section authorizes a certified nurse-midwife, a nurse practitioner, a physician assistant, or a naturopathic doctor, to order his or her own stock of dangerous drugs and devices."

10. Section 4022 of the Code states:

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

- "(a) Any drug that bears the legend: 'Caution: federal law prohibits dispensing without prescription,' 'Rx only,' or words of similar import.
- "(b) Any device that bears the statement: 'Caution: federal law restricts this device to sale by or on the order of a \_\_\_\_\_\_,' 'Rx only,' or words of similar import, the blank to be filled in with the designation of the practitioner licensed to use or order use of the device.
- "(c) Any other drug or device that by federal or state law can be lawfully dispensed only on prescription or furnished pursuant to Section 4006."
  - 11. Section 4081 states:
- "(a) All records of manufacture and of sale, acquisition, or disposition of dangerous drugs or dangerous devices shall be at all times during business hours open to inspection by authorized officers of the law, and shall be preserved for at least three years from the date of making. A current inventory shall be kept by every manufacturer, wholesaler, pharmacy, veterinary food-animal drug retailer, physician, dentist, podiatrist, veterinarian, laboratory, clinic, hospital, institution, or establishment holding a currently valid and unrevoked certificate, license, permit, registration, or exemption under Division 2 (commencing with Section 1200) of the Health and Safety Code or under Part 4 (commencing with Section 16000) of Division 9 of the Welfare and Institutions Code who maintains a stock of dangerous drugs or dangerous devices.
- "(b) The owner, officer, and partner of any pharmacy, wholesaler, or veterinary food-animal drug retailer shall be jointly responsible, with the pharmacist-in-charge or representative-in-charge, for maintaining the fecords and inventory described in this section.
- "(c) The pharmacist-in-charge or representative-in-charge shall not be criminally responsible for acts of the owner, officer, partner, or employee that violate this section and of which the pharmacist-in-charge or representative-in-charge had no knowledge, or in which he or she did not knowingly participate."

- 12. Section 4105 states:
- "(a) All records or other documentation of the acquisition and disposition of dangerous drugs and dangerous devices by any entity licensed by the board shall be retained on the licensed premises in a readily retrievable form.
- "(b) The licensee may remove the original records or documentation from the licensed premises on a temporary basis for license-related purposes. However, a duplicate set of those records or other documentation shall be retained on the licensed premises.
- "(c) The records required by this section shall be retained on the licensed premises for a period of three years from the date of making.
- "(d) Any records that are maintained electronically shall be maintained so that the pharmacist-in-charge, the pharmacist on duty if the pharmacist-in-charge is not on duty, or, in the case of a veterinary food-animal drug retailer or wholesaler, the designated representative on duty, shall, at all times during which the licensed premises are open for business, be able to produce a hard copy and electronic copy of all records of acquisition or disposition or other drug or dispensing-related records maintained electronically.
- "(e)(1) Notwithstanding subdivisions (a), (b), and (c), the board, may upon written request, grant to a licensee a waiver of the requirements that the records described in subdivisions (a), (b), and (c) be kept on the licensed premises.
- (2) A waiver granted pursuant to this subdivision shall not affect the board's authority under this section or any other provision of this chapter,"
- 13. Section 4115, subdivision (h), states that "[t]he pharmacist on duty shall be directly responsible for the conduct of a pharmacy technician supervised by that pharmacist."
  - 14. Section 4324 of the Code states:
- "(a) Every person who signs the name of another, or of a fictitious person, or falsely makes, alters, forges, utters, publishes, passes, or attempts to pass, as genuine, any prescription for any drugs is guilty of forgery and upon conviction thereof shall be punished by imprisonment in the state prison, or by imprisonment in the county jail for not more than one year.

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

### ITEALTH AND SAFETY CODE

15. Health and Safety Code section 11150 states:

"No person other than a physician, dentist, podiatrist, or veterinarian, or naturopathic doctor acting pursuant to Section 3640.7 of the Business and Professions Code, or pharmacist acting within the scope of a project authorized under Article 1 (commencing with Section 128125) of Chapter 3 of Part 3 of Division 107 or within the scope of Section 4052.1, 4052.2, or 4052.6 of the Business and Professions Code, a registered nurse acting within the scope of a project authorized under Article 1 (commencing with Section 128125) of Chapter 3 of Part 3 of Division 107, a certified nurse-midwife acting within the scope of Section 2746.51 of the Business and Professions Code, a nurse practitioner acting within the scope of Section 2836.1 of the Business and Professions Code, a physician assistant acting within the scope of a project authorized under Article 1 (commencing with Section 128125) of Chapter 3 of Part 3 of Division 107 or Section 3502.1 of the Business and Professions Code, a naturopathic doctor acting within the scope of Section 3640.5 of the Business and Professions Code, or an optometrist acting within the scope of Section 3041 of the Business and Professions Code, or an out-of-state prescriber acting pursuant to Section 4005 of the Business and Professions Code shall write or issue a prescription,"

- 16. Health and Safety Code section 11157 states: "No person shall issue a prescription that is false or fletitious in any respect."
  - 17. Health and Safety Code section 11173, states, in part:
- "(a) No person shall obtain or attempt to obtain controlled substances, or procure or attempt to procure the administration of or prescription for controlled substances. (1) by fraud. deceit, misrepresentation, or subterfuge; or (2) by the concealment of a material fact.
- "(b) No person shall make a false statement in any prescription, order, report, or record. required by this division."

### REGULATORY PROVISIONS

- 18. California Code of Regulations, title 16, section 1714 states, in pertinent part:
- "(d) Each pharmacist while on duty shall be responsible for the security of the prescription department, including provisions for effective control against theft or diversion of dangerous drugs and devices, and records for such drugs and devices. Possession of a key to the pharmacy where dangerous drugs and controlled substances are stored shall be restricted to a pharmacist."
  - 19. California Code of Regulations, title 16, section 1718 states:

"Current Inventory as used in Sections 4081 and 4332 of the Business and Professions Code shall be considered to include complete accountability for all dangerous drugs handled by every licensee enumerated in Sections 4081 and 4332.

"The controlled substances inventories required by Title 21, CFR, Section 1304 shall be available for inspection upon request for at least 3 years after the date of the inventory."

### COST RECOVERY

20. Section 125.3 provides that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licentiate to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

### CONTROLLED SUBSTANCES / DANGEROUS DRUGS

21. Hydrocodone Bltartrate and Acctaminophen referred to as hydrocodone/apap, with trade names of Lortab, Norco and Vicodin, is a Schedule III controlled substance pursuant to Health and Safety Code section 11056(e)(4), and is categorized as dangerous drug pursuant to section 4022. Hydrocodone is used for moderate to severe pain. As of October 6, 2014, hydrocodone/apap has been rescheduled to a Schedule II controlled substance.

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### FACTUAL SUMMARY

- 22. On or about February 9, 2012, Respondent Hoorfar, while working as a pharmacy technician at Rite Aid 5545 ("Rite Ald Pharmacy" or "the pharmacy"), located at 10120 Mason Avenue, Chatsworth, California, forged and entered into the pharmacy's database two fraudulent prescriptions for hydrocodone/apap 5/500mg, Rx 819426 and Rx 819424 for patient R.H., Respondent Hoorfar's sister. Respondent Antranik reviewed and authorized the prescriptions. At the time, Respondent Antranik was the pharmacist-in-charge of the Rite Aid Pharmacy.
- 23. Specifically, on February 9, 2012, Respondent Hoorfar forged and entered into the pharmacy's database an unauthorized refill of Rx 343804, a prescription of 20 tablets of hydrocodone/apap 5/500mg, for patient R.H. that the pharmacy dispensed on or about May 5, 2010. Respondent Hoorfar changed the prescription to 30 tablets of hydrocodone/apap 5/500mg, and documented that the refill was approved by "Susan" from the prescriber's office. Respondent Hoorfar processed the unauthorized prescription refill on "Fiold" status under Rx 819426. On or about February 16, 2012, another technician processed the prescription, Respondent Antranik reviewed and verified it, and it was eashed out on or about February 18, 2012.
- 24. Also, on February 9, 2012, Respondent Hoorfar forged and entered into the pharmacy's database an unauthorized refill of Rx 1485114, a prescription of 25 tablets of hydrocodone/apap 7.5/750 for patient R.H. that was dispensed by the pharmacy on or about April 26, 2011. Respondent Hoorfar changed the prescription to 60 tablets of hydrocodone/apap 5/500mg, and documented that the refill was approved by "Laura" from the prescriber's office. Respondent Hoorfar mistakenly dated the refill February 11, 2012. She processed it on February 9, 2012 under Rx 319424 and Respondent Anfranik reviewed and verified it.
- 25. An audit of the pharmacy for the period of May 1, 2011 through March 6, 2012, revealed that the pharmacy had in stock 286 tablets of hydrocodone/apap 5/500mg, over the quantity it should have pursuant to the pharmacy's records. The discrepancy could not be accounted for.

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### FIRST CAUSE FOR DISCIPLINE

### (Unprofessional Conduct - Fraudulent Prescriptions)

26. Respondent Hoorfar is subject to disciplinary action under section 4300 for unprofessional conduct as defined in sections 4301, subdivisions (f), (j), and (o), and 4060, in that she knowingly acted as an authorized prescriber and processed for patient R.H. two fraudulent prescriptions for hydrocodone/apap 5/500mg, a controlled substance and dangerous drug, Rx 819426 for 30 tablets and Rx 819424 for 60 tablets. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 22 through 25, inclusive, as though set forth fully herein.

## SECOND CAUSE FOR DISCIPLINE

### (Unprofessional Conduct - Forged Prescriptions)

27. Respondent Hoorfar is subject to disciplinary action under section 4300 for unprofessional conduct as defined in section 4301, subdivisions (g), (j), and (o), in conjunction with section 4324, subdivision (a), and Health and Safety Code sections 11173, subdivisions (a) and (b), 11150, and 11157, in that she knowingly forged and data-entered into the pharmacy's database for patient R.H. two fraudulent prescriptions for hydrocodone/apap 5/500mg, a controlled substance and dangerous drug, Rx 819426 for 30 tablets and Rx 819424 for 60 tablets. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 22 through 26, inclusive, as though set forth fully herein.

## THIRD CAUSÉ FOR DISCIPLINE

### (Unprofessional Conduct)

28. Respondent Hoorfar is subject to discipline pursuant to Code sections 4300 and 4301, in that she committed unprofessional conduct. Complainant refers to and by this reference incorporates allegations of paragraphs 22 through 27, above as though fully set forth.

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#### FOURTH CAUSE FOR DISCIPLINE

### (Failure to Properly Supervise Pharmacy Staff)

29. Respondent Antranik is subject to disciplinary action under section 4300 for unprofessional conduct as defined in section 4301, subdivision (o), in conjunction with section 4115, subdivision (h), for falling to properly supervise the activities of a pharmacy technician. Specifically, Respondent Antranik, while working at Rite Ald Pharmacy, failed to properly supervise Respondent Hoorfar, thereby, allowing her to forge and process two fraudulent prescriptions for hydrocodone/apap 5/500mg, a controlled substance and dangerous drug. Complainant refers to and by this reference incorporates allegations of paragraphs 22 through 28, above as though fully set forth.

### FIFTH CAUSE FOR DISCIPLINE

### (Lack of Operational Standards and Security)

30. Respondent Antranik is subject to disciplinary action under section 4301, subdivision (c), in conjunction with California Code of Regulations, title 16, section 1714, subdivision (d), in that she failed to maintain operational standards and security of the pharmacy. Specifically, Respondent Antranik, while working at Rite Aid Pharmacy, could not explain the discrepancy of 286 tablets of hydrocodone/apap in stock over the quantity it should have been pursuant to the Rite Aid Pharmacy's records. Complainant refers to and by this reference incorporates allegations of paragraphs 22 through 29, above as though fully set forth.

#### SIXTH CAUSE FOR DISCIPLINE

### (Failure to Maintain Complete and Accurate Records)

31. Respondent Antranik is subject to disciplinary action under section 4300 for unprofessional conduct as defined in section 4301, subdivisions (j) and (o), in conjunction with sections 4081 and 4105, and California Code of Regulations, title 16, section 1718, for failure to maintain a complete and accurate record for all controlled substances and dangerous drugs received, sold, or otherwise disposed of by the pharmacy. Respondent Antranik, while working as the pharmacist-in-charge of Rite Aid Pharmacy, was unable to account for the surplus of 286 tablets of hydrocodone/apap in stock above what was shown in the pharmacy's records.

ACCUSATION