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

In the Matter of the Accusation Against:

**TAGUI KALADZHYAN  
1717 N. Mariposa Ave., #A  
Los Angeles, CA 90027  
Pharmacist Technician Registration No.  
TCH 55453**

Respondent.

Case No. 5098  
OAH No. 2015020463  
**DEFAULT DECISION AND ORDER**  
[Gov. Code, §11520]

FINDINGS OF FACT

1. On or about September 14, 2014, Complainant Virginia K. Herold, in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs, filed Accusation No. 5098 against Tagui Kaladzhyan (Respondent) before the Board of Pharmacy. (Accusation attached as Exhibit A.)
2. On or about March 8, 2004, the Board of Pharmacy (Board) issued Pharmacist Technician Registration No. TCH 55453 to Respondent. The Pharmacist Technician Registration was in full force and effect at all times relevant to the charges brought in Accusation No. 5098 and will expire on October 31, 2015, unless renewed.

1           3.    On or about September 23, 2014, Respondent was served by Certified and First Class  
2 Mail copies of the Accusation No. 5098, Statement to Respondent, Notice of Defense, Request  
3 for Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6, and  
4 11507.7) at Respondent's address of record which, pursuant to Business and Professions Code  
5 section 4100, is required to be reported and maintained with the Board. Respondent's address of  
6 record was and is:

7    1717 N. Mariposa Ave., #A  
8    Los Angeles, CA 90027.

9           4.    Service of the Accusation was effective as a matter of law under the provisions of  
10 Government Code section 11505, subdivision (c) and/or Business & Professions Code section  
11 124.

12           5.    On or about September 28, 2014, Respondent signed and returned a Notice of  
13 Defense, requesting a hearing in this matter. A Notice of Hearing was served by mail at  
14 Respondent's address of record and at the address Respondent listed on her Notice of Defense.  
15 The Notice of Hearing informed her that an administrative hearing in this matter was scheduled  
16 for July 16, 2015. Respondent failed to appear at that hearing.

17           6.    Government Code section 11506 states, in pertinent part:

18                   (c) The respondent shall be entitled to a hearing on the merits if the respondent  
19 files a notice of defense, and the notice shall be deemed a specific denial of all parts  
20 of the accusation not expressly admitted. Failure to file a notice of defense shall  
21 constitute a waiver of respondent's right to a hearing, but the agency in its discretion  
22 may nevertheless grant a hearing.

23           7.    California Government Code section 11520 states, in pertinent part:

24                   (a) If the respondent either fails to file a notice of defense or to appear at the  
25 hearing, the agency may take action based upon the respondent's express admissions  
26 or upon other evidence and affidavits may be used as evidence without any notice to  
27 respondent.

28           8.    Pursuant to its authority under Government Code section 11520, the Board finds  
Respondent is in default. The Board will take action without further hearing and, based on the  
relevant evidence contained in the Default Decision Evidence Packet in this matter, as well as  
taking official notice of all the investigatory reports, exhibits and statements contained therein on

1 file at the Board's offices regarding the allegations contained in Accusation No. 5098, finds that  
2 the charges and allegations in Accusation No. 5098, are separately and severally, found to be true  
3 and correct by clear and convincing evidence.

4 9. Taking official notice of its own internal records, pursuant to Business and  
5 Professions Code section 125.3, it is hereby determined that the reasonable costs for Investigation  
6 and Enforcement are \$5,212.50 as of July 15, 2015.

7 DETERMINATION OF ISSUES

8 1. Based on the foregoing findings of fact, Respondent Tagui Kaladzhyan has subjected  
9 her Pharmacist Technician Registration No. TCH 55453 to discipline.

10 2. The agency has jurisdiction to adjudicate this case by default.

11 3. The Board of Pharmacy is authorized to revoke Respondent's Pharmacist Technician  
12 Registration based upon the following violations alleged in the Accusation which are supported  
13 by the evidence contained in the Default Decision Evidence Packet in this case:

14 a. Respondent is subject to disciplinary action under Business and Professions Code  
15 sections 490 and 4301, subdivision (l), in conjunction with California Code of Regulations, title  
16 16, section 1770, on the grounds of unprofessional conduct, in that she was convicted of one  
17 felony count of the substantially related crime of grand theft.

18 b. Respondent is subject to disciplinary action under Business and Professions Code  
19 section 4301, subdivision (f), on the grounds of unprofessional conduct, in that she committed  
20 acts involving moral turpitude, dishonesty, fraud, deceit, or corruption.

21 c. Respondent is subject to disciplinary action under section 4301, in that Respondent  
22 committed acts of unprofessional conduct.

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ORDER

IT IS SO ORDERED that Pharmacist Technician Registration No. TCH 55453, heretofore issued to Respondent Tagui Kaladzhyan, is revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on September 18, 2015.

It is so ORDERED August 19, 2015.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA



By \_\_\_\_\_

Amy Gutierrez, Pharm.D.  
Board President

51836490.DOC  
DOJ Matter ID:LA2014511237

Attachment:  
Exhibit A: Accusation

# Exhibit A

Accusation

(TAGUI KALADZHYAN)

1 KAMALA D. HARRIS  
Attorney General of California  
2 GREGORY J. SALUTE  
Supervising Deputy Attorney General  
3 M. TRAVIS PEERY  
Deputy Attorney General  
4 State Bar No. 261887  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-0962  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*  
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8 **BEFORE THE**  
9 **BOARD OF PHARMACY**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 5098

13 **TAGUI KALADZHIAN**  
1717 N. Mariposa Ave., #A  
Los Angeles, CA 90027

**ACCUSATION**

14 Pharmacist Technician Registration No. TCH 55453

15 Respondent.

16 Complainant alleges:

17 **PARTIES**

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

20 2. On or about March 8, 2004, the Board issued Pharmacist Technician Registration No.  
21 TCH 55453 to Tagui Kaladzhyan (Respondent). The Pharmacist Technician Registration was in  
22 full force and effect at all times relevant to the charges brought herein and will expire on  
23 October 31, 2015, unless renewed.

24 **JURISDICTION**

25 3. This Accusation is brought before the Board, under the authority of the following  
26 laws. All section references are to the Business and Professions Code unless otherwise indicated.

27 4. Section 4300, subdivision (a), states that "[e]very license issued may be suspended or  
28 revoked."



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

9 **REGULATORY PROVISION**

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

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

17 **COST RECOVERY**

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

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1 THIRD CAUSE FOR DISCIPLINE

2 (Unprofessional Conduct)

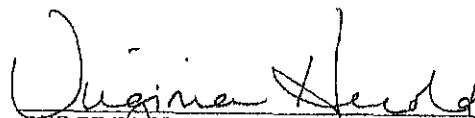
3 12. Respondent is subject to disciplinary action under section 4301, in that Respondent  
4 committed acts of unprofessional conduct. Complainant refers to and by this reference  
5 incorporates the allegations set forth above in paragraphs 10 through 11, inclusive, as though set  
6 forth fully.

7 PRAYER

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

- 10 1. Revoking or suspending Pharmacist Technician Registration No. TCH 55453, issued  
11 to Tagui Kaladzhyan;
- 12 2. Ordering Tagui Kaladzhyan to pay the Board the reasonable costs of the investigation  
13 and enforcement of this case, pursuant to section 125.3; and
- 14 3. Taking such other and further action as deemed necessary and proper.

15  
16 DATED: 9/14/14



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

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