

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

In the Matter of the Accusation Against:

**INF CORP. DBA STAR PHARMACY, MIKHAIL ISKHAKOV, PRES., YEFIM
IKHAKOV, SHAREHOLDER, AARON LOUIS SLOTKIN, PIC,**

Pharmacy Permit No. PHY 48401,

**INF CORP. DBA STAR PHARMACY, MIKHAIL ISKHAKOV, CEO, YEFIM
IKHAKOV, DIRECTOR, LARISA FAYMAN, DIRECTOR/SHAREHOLDER,
PIC,**

Pharmacy Permit No. PHY 57459,

AARON LOUIS SLOTKIN,

Pharmacist License No. RPH 61933;

and

FRANK CHRISTOPHER MILLER

Pharmacy Technician License No. TCH 107404;

Respondents

Agency Case No. 6555

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order for Public Repeval 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 November 4, 2020.

It is so ORDERED on October 5, 2020.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Greg Lippe", is written over a horizontal line.

By

Greg Lippe
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) 269-6301
6 Facsimile: (916) 731-2126
Attorneys for Complainant
7

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

12 In the Matter of the Accusation Against:

13 **INF CORP. DBA STAR PHARMACY,**
14 **IARISA FAYMAN, PIC, AARON LOUIS**
15 **SLOTKIN, PIC**
14400 Vanowen Street
Van Nuys, CA 91406

16 Pharmacy Permit Nos. PHY 57459, and
PHY 48401

17 **and**

18 **AARON LOUIS SLOTKIN**
19 1704 S. Crescent Heights Blvd.
Los Angeles, CA 90035

20 Pharmacist License No. RPH 61933

21 Respondents.
22
23
24

Case No. 6555

OAH No. 2020060586

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER FOR PUBLIC
REPROVAL AS TO PHARMACY
PERMIT NOS. PHY 48401 AND PHY
57459**

[Bus. & Prof. Code § 495]

25
26 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
27 entitled proceedings that the following matters are true:

28 ///

1 **PARTIES**

2 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy
3 (Board). She brought this action solely in her official capacity and is represented in this matter by
4 Xavier Becerra, Attorney General of the State of California, by Kevin J. Rigley, Deputy Attorney
5 General.

6 2. On or about June 11, 2007, the Board issued Pharmacy Permit No. PHY 57459 to
7 INF Corp. dba Star Pharmacy (Respondent), Aaron Louis Slotkin, Pharmacist-in-charge (PIC).
8 The Pharmacy Permit was in full force and effect at all times relevant to the charges brought
9 herein and will expire on June 1, 2021, unless renewed.

10 3. On or about June 11, 2007, the Board issued Pharmacy Permit No. PHY 48401 to
11 Star Pharmacy (Respondent). The Pharmacy Permit, which was in full force and effect at all
12 times relevant to the charges brought herein, expired on September 3, 2019, was not renewed, and
13 is now cancelled.

14 **JURISDICTION**

15 4. Accusation No. 6555 was filed before the Board of Pharmacy (Board), Department of
16 Consumer Affairs and is currently pending against Respondent. The Accusation and all other
17 statutorily required documents were properly served on Respondent on November 6, 2019.
18 Respondent timely filed its Notice of Defense contesting the Accusation. A copy of Accusation
19 No. 6555 is attached as exhibit A and incorporated herein by reference.

20 **ADVISEMENT AND WAIVERS**

21 5. Respondent has carefully read, fully discussed with counsel, and understands the
22 charges and allegations in Accusation No. 6555. Respondent has also carefully read, fully
23 discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary
24 Order for Public Reproval.

25 6. Respondent is fully aware of its legal rights in this matter, including the right to a
26 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
27 its own expense; the right to confront and cross-examine the witnesses against it; the right to
28 present evidence and to testify on its own behalf; the right to the issuance of subpoenas to compel

1 the attendance of witnesses and the production of documents; the right to reconsideration and
2 court review of an adverse decision; and all other rights accorded by the California
3 Administrative Procedure Act and other applicable laws.

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

6 **CULPABILITY**

7 8. Respondent understands and agrees that the charges and allegations in Accusation
8 No. 6555, if proven at a hearing, constitute cause for imposing discipline upon its Pharmacy
9 Permits.

10 9. For the purpose of resolving the Accusation without the expense and uncertainty of
11 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
12 basis for the charges in the Accusation, and that Respondent hereby gives up its right to contest
13 those charges.

14 10. Respondent agrees that its Pharmacy Permits are subject to discipline and it agrees to
15 be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

16 11. Respondent further agrees that in any future disciplinary proceeding before the Board
17 against Respondent the allegations set forth in Accusation No. 6555 shall be deemed admitted.

18 **CONTINGENCY**

19 12. This stipulation shall be subject to approval by the Board of Pharmacy. Respondent
20 understands and agrees that counsel for Complainant and the staff of the Board of Pharmacy may
21 communicate directly with the Board regarding this stipulation and settlement, without notice to
22 or participation by Respondent or his counsel. By signing the stipulation, Respondent
23 understands and agrees that it may not withdraw its agreement or seek to rescind the stipulation
24 prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation
25 as its Decision and Order, the Stipulated Settlement and Disciplinary Order for Public Repeval
26 shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
27 between the parties, and the Board shall not be disqualified from further action by having
28 considered this matter.

13. 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.

14. 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 of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary Order for Public Reproval may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

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

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Pharmacy Permit Nos. PHY 57459 and PHY 48401 issued to Respondent, shall be publicly reproved by the Board of Pharmacy under Business and Professions Code section 495 in resolution of Accusation No. 6555, attached as exhibit A. This decision constitutes a record of discipline and shall become a part of Respondent's license history with the Board.

Cost Recovery. Respondent shall pay \$9,655.12 to the Board for its costs associated with the investigation and enforcement of this matter. Respondent shall be permitted to pay these costs in a payment plan approved by the Board. If Respondent fails to pay the Board costs as ordered, Respondent shall not be allowed to renew its Pharmacy Permit No. PHY 57459 until Respondent pays costs in full.

Full Compliance. As a resolution of the charges in Accusation No. 6555, this stipulated settlement is contingent upon Respondent's full compliance with all conditions of this Order. If Respondent fails to satisfy any of these conditions, such failure to comply constitutes cause for

discipline, including outright revocation of Respondent's Pharmacy Permit Nos. PHY 57459 and PHY 48401.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order for Public Reapproval and have fully discussed it with my attorney, Herbert L. Weinberg. I understand the stipulation and the effect it will have on my Pharmacy Permit Nos. PHY 57459 and PHY 48401. I enter into this Stipulated Settlement and Disciplinary Order for Public Reapproval voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: _____

INF CORP. DBA STAR PHARMACY
Respondent

I have read and fully discussed with Respondent INF Corp., dba Star Pharmacy, the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order for Public Reapproval. I approve its form and content.

DATED: _____

HERBERT L. WEINBERG
Attorney for Respondent

///

///

///

///

///

///

///

///

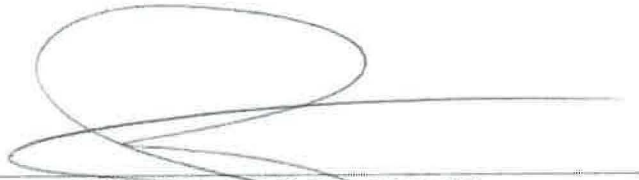
///

discipline, including outright revocation of Respondent's Pharmacy Permit Nos. PHY 57459 and PHY 48401.

ACCEPTANCE

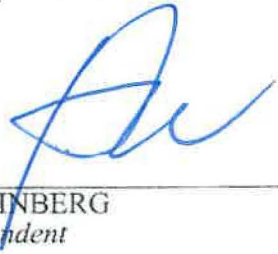
I have carefully read the above Stipulated Settlement and Disciplinary Order for Public Reapproval and have fully discussed it with my attorney, Herbert L. Weinberg. I understand the stipulation and the effect it will have on my Pharmacy Permit Nos. PHY 57459 and PHY 48401. I enter into this Stipulated Settlement and Disciplinary Order for Public Reapproval voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: 7-22-2020


INF CORP. DBA STAR PHARMACY
Respondent

I have read and fully discussed with Respondent INF Corp., dba Star Pharmacy, the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order for Public Reapproval. I approve its form and content.

DATED: 7/22/2020


HERBERT L. WEINBERG
Attorney for Respondent

///

///

///

///

///

///

///

///

///

ENDORSEMENT

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

DATED: July 22, 2020

Respectfully submitted,

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



KEVIN J. RIGLEY
Deputy Attorney General
Attorneys for Complainant

LA2019500723
63430138.docx

ENDORSEMENT

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

DATED: July 22, 2020

Respectfully submitted,

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



KEVIN J. RIGLEY
Deputy Attorney General
Attorneys for Complainant

LA2019500723
63430138.docx

Exhibit A

Accusation No. 6555

1 XAVIER BECERRA
Attorney General of California
2 KENT D. HARRIS
Supervising Deputy Attorney General
3 ELENA L. ALMANZO
Deputy Attorney General
4 State Bar No. 131058
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 210-7902
Facsimile: (916) 327-8643
7 *Attorneys for Complainant*

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

10 In the Matter of the Accusation Against:

Case No. 6555

11 **INF CORP. DBA STAR PHARMACY, MIKHAIL**
12 **ISKHAKOV, PRES, YEFIM IKHAKOV,**
13 **SHAREHOLDER, AARON LOUIS SLOTKIN, PIC**
14 **14400 Vanowen Street**
Van Nuys, CA 91406

A C C U S A T I O N

15 **Pharmacy Permit No. PHY 48401,**

16 **INF CORP. DBA STAR PHARMACY, MIKHAIL**
17 **ISKHAKOV, CEO, YEFIM IKHAKOV, DIRECTOR,**
18 **IARISA FAYMAN, DIRECTOR/SHAREHOLDER, PIC**
19 **6735 Vaijean Street**
Van Nuys, CA 91406

20 **Pharmacy Permit No. PHY 57459,**

21 **AARON LOUIS SLOTKIN**
22 **1704 S. Crescent Heights Blvd.**
23 **Los Angeles, CA 90035**

24 **Pharmacist License No. RPH 61933,**

25 **FRANK CHRISTOPHER MILLER**
26 **3039 Caspian Drive**
27 **Palmdale, CA 93551**

28 **Pharmacy Technician License No. TCH 107404**

Respondents.

1 Complainant alleges:

2 **PARTIES**

3 1. Anne Sodergren (Complainant) brings this Accusation solely in her official capacity
4 as the Interim Executive Officer of the Board of Pharmacy (Board), Department of Consumer
5 Affairs.

6 2. On or about June 11, 2007, the Board issued Pharmacy Permit No. PHY 48401 to
7 INF Corp. dba Star Pharmacy, (Respondent Star Pharmacy), located at 14400 Vanowen St., Van
8 Nuys, California. Maya Mulayeva Nissimm was the Pharmacist-in-charge from December 5,
9 2006 to February 12, 2007 and January 17, 2019 to September 6, 2019. Aaron Louis Slotkin was
10 the Pharmacist-in-charge from June 1, 2015 to August 19, 2018. The Pharmacy Permit was in
11 full force and effect at all times relevant to the charges brought herein and expired on September
12 3, 2019, due to a change in location.

13 3. On or about September 3, 2019, the Board issued Pharmacy Permit No. PHY 57459
14 to INF Corp. dba STAR Pharmacy located at 6735 Vaijean Avenue, Van Nuys, California;
15 Larissa Fayman is the Pharmacist-in-charge. Said license is in full force and effect and will
16 expire on January 15, 2020, unless renewed.

17 4. On or about November 7, 2008, the Board issued Pharmacist License Number RPH
18 61933 to Aaron Louis Slotkin (Respondent Slotkin). The Pharmacist License was in full force
19 and effect at all times relevant to the charges brought herein and will expire on June 30, 2020,
20 unless renewed.

21 5. On or about October 19, 2010, the Board issued Pharmacy Technician License
22 Number TCH 107404 to Frank Christopher Miller (Respondent Miller). The Pharmacy
23 Technician License was in full force and effect at all times relevant to the charges brought herein
24 and will expire on February 29, 2020, unless renewed.

25 **JURISDICTION**

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

28 7. Section 4300 of the Code states, in pertinent part:

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

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

5 (1) Suspending judgment.

6 (2) Placing him or her upon probation.

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

8 (4) Revoking his or her license.

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

11 8. Section 4300.1 of the Code states:

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

18 **STATUTORY PROVISIONS**

19 9. Section 4301 of the Code states, in pertinent part:

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

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

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

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

(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.

10. Section 4022 of the Code states

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

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

3 . . .

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

6 11. Section 4081 of the Code states, in pertinent part:

7 (a) All records of manufacture and of sale, acquisition, or disposition of dangerous
8 drugs or dangerous devices shall be at all times during business hours open to
9 inspection by authorized officers of the law, and shall be preserved for at least three
10 years from the date of making. A current inventory shall be kept by every
11 manufacturer, wholesaler, pharmacy, . . . who maintains a stock of dangerous drugs or
12 dangerous devices."

13 (b) The owner, officer, and partner of any pharmacy . . . shall be jointly responsible,
14 with the pharmacist-in-charge or representative-in-charge, for maintaining the records
15 and inventory described in this section.

16 12. Section 4113 states, in pertinent part:

17 (a) Every pharmacy shall designate a pharmacist-in-charge and within 30 days
18 thereof, shall notify the board in writing of the identity and license number of that
19 pharmacist and the date he or she was designated.

20 . . .

21 (c) The pharmacist-in-charge shall be responsible for a pharmacy's compliance with
22 all state and federal laws and regulations pertaining to the practice of pharmacy.

23 . . .

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

28 **REGULATORY PROVISIONS**

14. California Code of Regulations, Title 16, Section 1714 states, in pertinent part:

. . .

(b) Each pharmacy licensed by the board shall maintain its facilities, space, fixtures,
and equipment so that drugs are safely and properly prepared, maintained, secured
and distributed. The pharmacy shall be of sufficient size and unobstructed area to
accommodate the safe practice of pharmacy.

. . .

(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.

...

15. California Code of Regulations, title 16, section 1718, states as follows:

“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.

DRUGS

16. “Xanax” is a brand name for alprazolam, and alprazolam is a Schedule IV controlled substances within the meaning of the Health and Safety Code 11057 (d) (1) and a dangerous drug within the meaning of Business and Professions Code section 4022.

COST RECOVERY

17. Section 125.3 of the Code states, in pertinent part, that the Board may request the administrative law judge to direct a licensee 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.

BACKGROUND

18. On or about September 2, 2018, a pharmacist at Respondent Star discovered that while the pharmacy had ordered three bottles of alprazolam 2 mg on August 31, 2018, there was no alprazolam 2 mg in stock and no records showed the medication had been dispensed

19. Surveillance video from August 31, 2018, showed Respondent Miller taking three bottles of alprazolam 2 mg from the shelves of Respondent Star Pharmacy without authorization. On or about September 1, 2018, the surveillance video showed Respondent Miller placing the alprazolam bottles into the trash and later taking the same trash and placing it into his car which was parked next to the pharmacy dumpster. On September 6, 2018, Respondent Miller admitted to a Los Angeles Police officer that he took the bottles of alprazolam 2 mg. Respondent Miller

1 was terminated from employment at Respondent Star Pharmacy.

2 20. On September 17, 2018, STAR Pharmacy submitted a report of theft or loss of
3 controlled substances showing the following losses: 62,700 tablets of Alprazolam 2 mg; 500
4 tablets of alprazolam 0.5 mg, and 10,000 tablets of Alprazolam 1 mg.

5 21. On or about January 7, 2019, in *People v. Frank Christopher Miller*, Los Angeles
6 Superior Court, Case No. 8VW06031, Respondent was convicted on his plea of no contest to a
7 violation of Penal Code section 508 (embezzlement) for taking Xanax pills having a value of
8 \$2,400.00, which was the property of Respondent Star Pharmacy.

9 22. A Board Inspector conducted an audit using Respondent Star Pharmacy's
10 acquisition and disposition records for alprazolam for the period of July 5, 2015 to September 26,
11 2018. Based upon those records, the Inspector determined that Respondents' actual shortage of
12 alprazolam was as follows: 593 tablets of alprazolam 0.5 mg; 21,494 tablets of alprazolam 1 mg;
13 and 79,864 tablets of alprazolam 2 mg.

14 **RESPONDENT MILLER**

15 **FIRST CAUSE FOR DISCIPLINE**
16 **(Conviction of a Crime)**

17 23. Respondent Miller is subject to disciplinary action under Code sections 490 and
18 4301 subds. (k) and (l) in that he was convicted of a crime substantially related to the practice of a
19 pharmacy technician. The circumstances are set forth above in paragraph 20.

20 **SECOND CAUSE FOR DISCIPLINE**
21 **(Possession of a Controlled Substance)**

22 24. Respondent Miller is subject to disciplinary action under Code sections 4301 subds.
23 (j) and (o) in that he illegally possessed controlled substances as set forth above in paragraph 18.

24 **THIRD CAUSE FOR DISCIPLINE**
25 **(Dishonest Acts)**

26 25. Respondent Miller is subject to disciplinary action under Code sections 4301 subd. (f)
27 in that he was dishonest or fraudulent in taking controlled substances without authorization from
28

Respondent Star Pharmacy where he was employed as a pharmacy technician, substances as set forth above in paragraph 18 and 20.

RESPONDENT STAR PHARMACY

**FOURTH CAUSE FOR DISCIPLINE
(Failure to Maintain Dangerous Drugs in Safe and Secure Manner)**

26. Respondent Star Pharmacy is subject to disciplinary action under Code sections 4300 and 4301, subdivisions (j) and (o), in conjunction with California Code of Regulations, title 16, section 1714, subdivision (b), in that Respondent Star Pharmacy failed to maintain its facilities, space, fixtures, and equipment so that drugs in its stock were safely and properly prepared, maintained, secured and distributed. Respondent Star Pharmacy's failures resulted in the loss of 101,951 tablets of the dangerous drug Alprazolam as set forth in paragraphs 17 through 21, above, incorporated herein by reference.

**FIFTH CAUSE FOR DISCIPLINE
(Failure to Maintain Records of Disposition of Dangerous Drugs)**

27. Respondent Star Pharmacy is subject to disciplinary action under Code sections 4300 and 4300.1, subdivisions (j) and (o), in conjunction with Code sections 4081, subdivision (a), and 4105, in that it failed to maintain and preserve all records of acquisition, disposition, and current inventory of dangerous drugs which resulted in their failure to have records of disposition to account for an inventory shortage of 101,951 tablets of the dangerous drug Alprazolam as set forth in paragraphs 17 through 21, above, incorporated herein by reference.

RESPONDENT SLOTKIN

**SIXTH CAUSE FOR DISCIPLINE
(Failure to Maintain Dangerous Drugs in Safe and Secure Manner)**

28. Under Code section 4113, the pharmacist-in-charge is responsible for a pharmacy's compliance with all state and federal laws and regulations pertaining to the practice of pharmacy. Respondent Slotkin, the Pharmacist-in-Charge of Respondent Star Pharmacy, is subject to disciplinary action sections 4300 and 4300.1, subdivisions (j) and (o), in conjunction with California Code of Regulations, title 16, section 1714, subdivision (d), in that Respondent Slotkin failed to secure the prescription department of Respondent Star Pharmacy and failed to provide

1 for the effective control against theft or diversion of dangerous drugs resulting in the loss of
2 101,951 tablets of alprazolam as set forth in paragraphs 17 through 21, above, incorporated herein
3 by reference.

4 **SEVENTH CAUSE FOR DISCIPLINE**
5 **(Failure to Maintain Records of Disposition of Dangerous Drugs)**

6 29. Respondent Slotkin is subject to disciplinary action under Code sections 4300 and
7 4300.1, subdivisions (j) and (o), in conjunction with Code sections 4081, subdivision (a), and
8 4105, in that he failed to maintain and preserve all records of acquisition, disposition, and current
9 inventory of dangerous drugs which resulted in their failure to have records of disposition to
10 account for an inventory shortage of 101,951 tablets of the dangerous drug Alprazolam as set
11 forth in paragraphs 17 through 21, above, incorporated herein by reference.

12 **PRAYER**

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

15 1. Revoking or suspending Pharmacy Technician License Number TCH 107404, issued
16 to Frank Christopher Miller;

17 2. Revoking or suspending Pharmacy Permit Number PHY 48401, issued to INF Corp.
18 dba Star Pharmacy, Aaron Louis Slotkin, PIC;

19 3. Revoking or suspending Pharmacy Permit Number PHY 57459, issued to INF Corp.
20 dba Star Pharmacy, Larisa Fayman, PIC;

21 4. Revoking or suspending Pharmacist License Number RPH 61933, issued to Aaron
22 Louis Slotkin;

23 5. Ordering Frank Christopher Miller, Star Pharmacy, and Aaron Louis Slotkin to pay
24 the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case,
25 pursuant to Business and Professions Code section 125.3; and,
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

6. Taking such other and further action as deemed necessary and proper.

DATED: November 4, 2019



ANNE SODERGREN
Interim Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

LA2019500723
14194033.docx