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

In the Matter of the Accusation Against:

**ANAIT GEVORGOVNA GUYUMZHYAN
1747 N. Normandie Ave., #205
Los Angeles, CA 90027**

**Pharmacy Technician No. TCH 99688
(cancelled 2/5/2018)**

Respondent.

Case No. 6559

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

FINDINGS OF FACT

1. On or about March 26, 2020, Complainant Anne Sodergren, in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs, filed Accusation No. 6559 against Anait Gevorgovna Guyumzhyan (Respondent) before the Board of Pharmacy. (Accusation attached as Exhibit A.)

2. On or about June 1, 2010, the Board of Pharmacy (Board) issued Pharmacy Technician No. TCH 99688 (cancelled 2/5/2018) to Respondent. The Pharmacy Technician expired on October 31, 2017, and has not been renewed. On or about April 2, 2020, Respondent was served by Certified and First Class Mail copies of the Accusation No. 6559, Statement to

1 Respondent, Notice of Defense, Request for Discovery, and Discovery Statutes (Government
2 Code sections 11507.5, 11507.6, and 11507.7) at Respondent's address of record which, pursuant
3 to Business and Professions Code section 4100, is required to be reported and maintained with the
4 Board. Respondent's address of record was and is:

5 1747 N. Normandie Ave., #205
6 Los Angeles, CA 90027.

7 3. Service of the Accusation was effective as a matter of law under the provisions of
8 Government Code section 11505(c) and/or Business and Professions Code section 124.

9 4. Government Code section 11506(c) states, in pertinent part:

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

15 5. The Board takes official notice of its records and the fact that Respondent failed to
16 file a Notice of Defense within 15 days after service upon her of the Accusation, and therefore
17 waived her right to a hearing on the merits of Accusation No. 6559.

18 6. California Government Code section 11520(a) states, in pertinent part:

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

23 7. Pursuant to its authority under Government Code section 11520, the Board finds
24 Respondent is in default. The Board will take action without further hearing and, based on the
25 relevant evidence contained in the Default Decision Investigatory Evidence Packet in this matter,
26 as well as taking official notice of all the investigatory reports, exhibits and statements contained
27 therein on file at the Board's offices regarding the allegations contained in Accusation No. 6559,
28 finds that the charges and allegations in Accusation No. 6559, are separately and severally, found
to be true and correct by clear and convincing evidence.

8. The Board finds that the actual costs for Investigation and Enforcement are \$5,488.75 as
of June 4, 2020.

DETERMINATION OF ISSUES

1
2 1. Based on the foregoing findings of fact, Respondent Anait Gevorgovna Guyumzhyan
3 has subjected her Pharmacy Technician No. TCH 99688 (cancelled 2/5/2018) to discipline.

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

5 3. The Board of Pharmacy is authorized to revoke Respondent's Pharmacy Technician
6 based upon the following violations alleged in the Accusation, which are supported by the
7 evidence contained in the Default Decision Investigatory Evidence Packet in this case:

8 a. Violation of Business and Professions Code section 4059, subdivision (a) (Furnishing
9 Dangerous Drugs).

10 b. Violation of Business and Professions Code section 4060 (Controlled Substance
11 Prescription Required).

12 c. Violation of Health and Safety Code section 11171 (Prescribing Controlled
13 Substances).

14 d. Violation of Health and Safety Code section 11173, subdivisions (a) and (b) (Fraud,
15 Deceit, Misrepresentation, or False Statement).

16 e. Violation of Health and Safety Code section 11174 (False Name or Address in
17 Connection with Prescriptions).

18 f. Violation of Health and Safety Code section 11175 (Obtaining or Possessing
19 Nonconforming Prescription).

20 g. Violation of Health and Safety Code section 11180 (Prohibition on Controlled
21 Substances Obtained by Nonconforming Prescription).

22 h. Violation of Business and Professions Code section 4301, subdivision (f).
23 (Unprofessional Conduct: Act Involving Moral Turpitude, Dishonesty, Fraud, Deceit, or
24 Corruption).

25 i. Violation of Business and Professions Code section 4301, subdivision (j)
26 (Unprofessional Conduct: Violation of Any Law Regulating Controlled Substances and
27 Dangerous Drugs).

28 ///

1 j. Violation of Business and Professions Code section 4301, subdivision (o)
2 (Unprofessional Conduct: Violation of Pharmacy Law).

3 k. Violation of Business and Professions Code sections 490, 493, 4301, subdivision (l)
4 in conjunction with California Code of Regulations, title 16, section 1770 (Conviction of a
5 Substantially Related Crime).

6 **ORDER**

7 IT IS SO ORDERED that Pharmacy Technician No. TCH 99688 (cancelled 2/5/2018),
8 issued to Respondent Anait Gevorgovna Guyumzhyan, is revoked.

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

13 This Decision shall become effective at 5:00 p.m. on August 26, 2020.

14 It is so ORDERED on July 27, 2020.

15 FOR THE BOARD OF PHARMACY
16 DEPARTMENT OF CONSUMER AFFAIRS

17
18 By 

19 _____
20 Greg Lippe
21 Board President

21 63331726.DOCX
22 DOJ Matter ID:LA2019500645

23 Attachment:
24 Exhibit A: Accusation

Exhibit A

Accusation

(ANAIT GEVORGOVNA GUYUMZHYAN)

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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:

Case No. 6559

13 **ANAIT GEVORGOVNA GUYUMZHYAN**
14 **1747 N. Normandie Ave., #205**
Los Angeles, CA 90027

ACCUSATION

15 **Pharmacy Technician No. TCH 99688**
16 **(canceled 2/5/2018)**

17 Respondent.

18
19 **PARTIES**

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

22 2. On or about June 1, 2010, the Board of Pharmacy issued Pharmacy Technician
23 Number TCH 99688 to Anait Gevorgovna Guyumzhyan (Respondent). The Pharmacy
24 Technician expired on October 31, 2017 and was canceled on February 5, 2018.

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.

STATUTORY PROVISIONS

4. Section 490 of the Code states:

"(a) In addition to any other action that a board is permitted to take against a licensee, a board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued.

"(b) Notwithstanding any other provision of law, a board may exercise any authority to discipline a licensee for conviction of a crime that is independent of the authority granted under subdivision (a) only if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the licensee's license was issued.

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

5. Section 493 of the Code states:

"Notwithstanding any other provision of law, in a proceeding conducted by a board within the department pursuant to law to deny an application for a license or to suspend or revoke a license or otherwise take disciplinary action against a person who holds a license, upon the ground that the applicant or the licensee has been convicted of a crime substantially related to the qualifications, functions, and duties of the licensee in question, the record of conviction of the crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact, and the board may inquire into the circumstances surrounding the commission of the crime in order to fix the degree of discipline or to determine if the conviction is substantially related to the qualifications, functions, and duties of the licensee in question. "As used in this section, 'license' includes 'certificate,' 'permit,' 'authority,' and 'registration.'"

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1 6. Section 4059 of the Code states:

2 "(a) A person may not furnish any dangerous drug, except upon the prescription of a
3 physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section
4 3640.7. A person may not furnish any dangerous device, except upon the prescription of a
5 physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section
6 3640.7."

7 7. Section 4060 of the Code states:

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

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

22 8. Section 4300 of the Code provides in pertinent part that every license issued by the
23 Board is subject to discipline, including suspension or revocation.

24 9. Section 4300.1 states:

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

3 10. Section 4301 of the Code states:

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

7 ***

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

11 ***

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

14 ***

15 “(l) The conviction of a crime substantially related to the qualifications, functions, and
16 duties of a licensee under this chapter. The record of conviction of a violation of Chapter 13
17 (commencing with Section 801) of Title 21 of the United States Code regulating controlled
18 substances or of a violation of the statutes of this state regulating controlled substances or
19 dangerous drugs shall be conclusive evidence of unprofessional conduct. In all other cases, the
20 record of conviction shall be conclusive evidence only of the fact that the conviction occurred.
21 The board may inquire into the circumstances surrounding the commission of the crime, in order
22 to fix the degree of discipline or, in the case of a conviction not involving controlled substances
23 or dangerous drugs, to determine if the conviction is of an offense substantially related to the
24 qualifications, functions, and duties of a licensee under this chapter. A plea or verdict of guilty or
25 a conviction following a plea of nolo contendere is deemed to be a conviction within the meaning
26 of this provision. The board may take action when the time for appeal has elapsed, or the
27 judgment of conviction has been affirmed on appeal or when an order granting probation is made
28 suspending the imposition of sentence, irrespective of a subsequent order under Section 1203.4 of

1 the Penal Code allowing the person to withdraw his or her plea of guilty and to enter a plea of not
2 guilty, or setting aside the verdict of guilty, or dismissing the accusation, information, or
3 indictment.

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

8 11. Section 11171 of the Health and Safety Code states: “No person shall prescribe,
9 administer, or furnish a controlled substance except under the conditions and in the manner
10 provided by this division.”

11 12. Section 11173 of the Health and Safety Code states:

12 “(a) No person shall obtain or attempt to obtain controlled substances, or procure or
13 attempt to procure the administration of or prescription for controlled substances, (1) by fraud,
14 deceit, misrepresentation, or subterfuge; or (2) by the concealment of a material fact.

15 “(b) No person shall make a false statement in any prescription, order, report, or record,
16 required by this division.”

17 13. Section 11174 of the Health and Safety Code states: “No person shall, in connection
18 with the prescribing, furnishing, administering, or dispensing of a controlled substance, give a
19 false name or false address.”

20 14. Section 11175 of the Health and Safety Code states: “No person shall obtain or
21 possess a prescription that does not comply with this division, nor shall any person obtain a
22 controlled substance by means of a prescription which does not comply with this division or
23 possess a controlled substance obtained by such a prescription.”

24 15. Section 11180 of the Health and Safety Code states: “No person shall obtain or
25 possess a controlled substance obtained by a prescription that does not comply with this division.”

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1 **REGULATORY PROVISIONS**

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

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

9 **CONTROLLED SUBSTANCES/DANGEROUS DRUGS**

10 17. Oxycodone is a synthetic opioid analgesic and a schedule II controlled substance
11 pursuant to Health and Safety Code section 11055(b)(1)(M) and a dangerous drug pursuant to
12 Business and Professions Code section 4022(c).

13 **COST RECOVERY**

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

20 **FACTUAL ALLEGATIONS**

21 19. Respondent, an unemployed Pharmacy Technician was arrested on December 23,
22 2015 and served a search warrant by the Ventura County Sheriff's Department. A search of her
23 apartment, which she shared with her sister, mother, and grandmother resulted in the following
24 items being seized, amongst others:

- 25 a. Paperwork with other people's identification information as well as copies of
26 identification cards. Some of the information included were names, birthdates,
27 addresses, medical insurance coverage information with member identification
28 numbers, pharmacy names and locations with dates of prescription drop off and pick-up

1 as well as International Classification of Diseases codes used by Medicare and
2 Medicaid for billing.

- 3 b. Paperwork with identification information and filled out prescriptions from a Dr. G.
4 Respondent's sister used to work in Dr. G's office.
- 5 c. Paper with a script reference of what to say when someone would call Dr. G's office.
- 6 d. Three (3) filled out prescriptions from Dr. G for Oxycodone 30mg 90 count. All three
7 (3) prescriptions had two addresses listed on the prescription for Dr. G's office; and all
8 three (3) had the Simi Valley office location checked. Three (3) receipts for filled
9 Oxycodone prescriptions filled at Prestige Pharmacy in Glendale, CA.
- 10 e. Receipt for filled Oxycodone prescription in the name of L.K. filled at Walgreens in
11 Thousand Oaks, CA.
- 12 f. Paper with notes containing names and pill quantities, and money amounts.
- 13 g. Receipt from CVS Pharmacy in Newbury Park, CA.
- 14 h. Paper with handwritten list of different CVS Pharmacies in Simi Valley, Thousand
15 Oaks, Camarillo, Woodland Hills, Tarzana, Van Nuys, and Canyon Country.

16 20. Upon questioning by the police, Respondent admitted that she and her sister began
17 filling prescriptions in other people's names and were paid money for it. Specifically, Respondent
18 explained that she and her sister originally knew a person named, "Grisha" who paid them to do
19 this and then a person known as "Arman" took over. Arman would give Respondent a prepaid
20 cell phone so they could contact each other. Arman paid Respondent \$150.00 per patient for each
21 prescription she filled. Respondent admitted Arman would have her fill the prescriptions in such
22 cities as Thousand Oaks and Oxnard. According to Respondent, Arman would pay each patient
23 \$180.00 for their information to use on the prescriptions. Once Respondent filled the prescriptions
24 she would take the pills to Arman. Respondent suspected that Arman then sold the pills.

25 **FIRST CAUSE FOR DISCIPLINE**

26 **(Furnishing Dangerous Drugs)**

27 21. Respondent is subject to disciplinary action under section 4059, subdivision (a) for
28 furnishing a dangerous drug without a prescription from a physician, dentist, podiatrist,

1 optometrist, veterinarian, or naturopathic doctor. Specifically, Respondent filled fraudulent
2 prescriptions for Oxycodone and then gave the pills to Arman. Complainant refers to and by this
3 reference incorporates allegations of paragraphs 19 and 20 above as though fully set forth.

4 **SECOND CAUSE FOR DISCIPLINE**

5 **(Controlled Substance Prescription Required)**

6 22. Respondent is subject to disciplinary action under section 4060 for possessing a
7 controlled substance without a prescription from a physician, dentist, podiatrist, optometrist,
8 veterinarian, or naturopathic doctor. Specifically, Respondent filled fraudulent prescriptions for
9 Oxycodone and then gave the pills to Arman. Complainant refers to and by this reference
10 incorporates allegations of paragraphs 19 and 20 above as though fully set forth.

11 **THIRD CAUSE FOR DISCIPLINE**

12 **(Prescribing Controlled Substances)**

13 23. Respondent is subject to disciplinary action under Health and Safety Code section
14 11171 for prescribing, administering, or furnishing a controlled substance except under the
15 conditions and in the manner provided by this division; prescribing and furnishing controlled
16 substances without a valid prescription from a physician is a violation of this section.
17 Specifically, Respondent filled fraudulent prescriptions in other people's names for Oxycodone
18 and then gave the pills to Arman. Complainant refers to and by this reference incorporates
19 allegations of paragraphs 19 and 20 above as though fully set forth.

20 **FOURTH CAUSE FOR DISCIPLINE**

21 **(Fraud, Deceit, Misrepresentation, or False Statement)**

22 24. Respondent is subject to disciplinary action under Health and Safety Code section
23 11173, subdivisions (a) and (b) for obtaining or attempting to obtain controlled substances, or
24 procuring or attempting to procure the administration of or prescription for controlled substances
25 by fraud, deceit, misrepresentation or false statement. Specifically, Respondent filled fraudulent
26 prescriptions in other people's names for Oxycodone and then gave the pills to Arman.
27 Complainant refers to and by this reference incorporates allegations of paragraphs 19 and 20
28 above as though fully set forth.

1 **FIFTH CAUSE FOR DISCIPLINE**

2 **(False Name or Address in Connection with Prescriptions)**

3 25. Respondent is subject to disciplinary action under Health and Safety Code section
4 11174 for giving a false name or address in connection with the prescribing, furnishing,
5 administering, or dispensing of a controlled substance. Specifically, Respondent filled fraudulent
6 prescriptions in other people’s names for Oxycodone and then gave the pills to Arman.
7 Complainant refers to and by this reference incorporates allegations of paragraphs 19 and 20
8 above as though fully set forth.

9 **SIXTH CAUSE FOR DISCIPLINE**

10 **(Obtaining or Possessing Nonconforming Prescription)**

11 26. Respondent is subject to disciplinary action under Health and Safety Code section
12 11175 for obtaining or possessing a prescription that does not comply with this division,
13 obtaining a controlled substance by means of a prescription that does not comply with this
14 division or possessing a controlled substance obtained by such a prescription. Specifically,
15 Respondent filled fraudulent prescriptions in other people’s names for Oxycodone and then gave
16 the pills to Arman. Complainant refers to and by this reference incorporates allegations of
17 paragraphs 19 and 20 above as though fully set forth.

18 **SEVENTH CAUSE FOR DISCIPLINE**

19 **(Prohibition on Controlled Substances Obtained by Nonconforming Prescription)**

20 27. Respondent is subject to disciplinary action under Health and Safety Code section
21 11180 for obtaining or possessing a controlled substance obtained by a prescription that does not
22 comply with this division. Specifically, Respondent filled fraudulent prescriptions in other
23 people’s names for Oxycodone and then gave the pills to Arman. Complainant refers to and by
24 this reference incorporates allegations of paragraphs 19 and 20 above as though fully set forth.

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1 **EIGHTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct: Act Involving Moral Turpitude, Dishonesty, Fraud, Deceit, or**
3 **Corruption)**

4 28. Respondent is subject to disciplinary action for unprofessional conduct under section
5 4301, subdivision (f), for the commission of an act involving moral turpitude, dishonesty, fraud,
6 deceit, or corruption. Specifically, Respondent filled fraudulent prescriptions in other people's
7 names for Oxycodone and then gave the pills to Arman. Complainant refers to and by this
8 reference incorporates allegations of paragraphs 19 and 20 above as though fully set forth.

9 **NINTH CAUSE FOR DISCIPLINE**

10 **(Unprofessional Conduct: Violation of Any Law Regulating Controlled Substances and**
11 **Dangerous Drugs)**

12 29. Respondent is subject to disciplinary action for unprofessional conduct under section
13 4301, subdivision (j), for violation of any of the statutes of this state, of any other state, or of the
14 United States regulating controlled substances and dangerous drugs. Specifically, Respondent
15 filled fraudulent prescriptions in other people's names for Oxycodone and then gave the pills to
16 Arman. Complainant refers to and by this reference incorporates allegations of paragraphs 19 and
17 20 above as though fully set forth.

18 **TENTH CAUSE FOR DISCIPLINE**

19 **(Unprofessional Conduct: Violation of Pharmacy Law)**

20 30. Respondent is subject to disciplinary action for unprofessional conduct under section
21 4301, subdivision (o), for violating or attempting to violate, directly or indirectly, or assisting in
22 or abetting the violation of or conspiring to violate any provision or term of this chapter or of the
23 applicable federal and state laws and regulations governing pharmacy, including regulations
24 established by the board or by any other state or federal regulatory agency. Specifically,
25 Respondent filled fraudulent prescriptions in other people's names for Oxycodone and then gave
26 the pills to Arman. Complainant refers to and by this reference incorporates allegations of
27 paragraphs 19 and 20 above as though fully set forth.

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1 **ELEVENTH CAUSE FOR DENIAL OF APPLICATION**

2 **(Conviction of a Substantially Related Crime)**

3 31. Respondent is subject to discipline under sections 490, 493, 4301, subdivision (l) in
4 conjunction with California Code of Regulations, title 16, section 1770, in that she was convicted
5 of a crime that is substantially related to the qualifications, duties, and functions of a pharmacist.

6 The circumstances are as follows:

- 7 a. On or about March 2, 2020 in a criminal proceeding entitled *USA v. Matosyan et al*
8 (U.S. District Court, 2017, No. 2:17cr480), Respondent pleaded guilty and was
9 convicted of one felony count of violating 42 U.S.C. § 1320(a)-7b(b)(2)(A) [Payment of
10 Illegal Remunerations for Health Case Referrals]. The circumstances underlying this
11 conviction are more fully alleged in paragraphs 19 and 20 above. Complainant refers to
12 and by this reference incorporates allegations of paragraphs 19 and 20 above as though
13 fully set forth.
- 14 b. On or about March 2, 2020, Respondent was sentenced to probation for a term of two
15 (2) years; a special assessment of \$100; restitution of \$6,545.47. Respondent is held
16 jointly and severally liable with her co-defendants to the extent the co-defendants are
17 ordered to pay restitution for the same victim loss.

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PRAYER

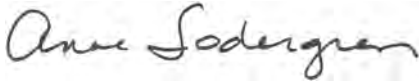
WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Pharmacy issue a decision:

1. Revoking or suspending Pharmacy Technician Number TCH 99688, issued to Anait Gevorgovna Guyumzhyan;

2. Ordering Anait Gevorgovna Guyumzhyan 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; and,

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

DATED: March 26, 2020



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

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