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

In the Matter of the Accusation Against:

JAJCO INC. DBA ANCHOR DRUGS III; KANAAN PAUL JAJEH FAMILY TRUST and RAYMOND PAUL JAJEH,

Pharmacy Permit No. PHY 48787

and

RAYMOND PAUL JAJEH,

Pharmacist License No. RPH 47418

Respondents

Case number 6819

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order for Public Reproval 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 March 19, 2021.

It is so ORDERED on February 17, 2021.

BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

My n. Lippe

Ву

Greg Lippe Board President

1	XAVIER BECERRA	
2	Attorney General of California DIANN SOKOLOFF	
3	Supervising Deputy Attorney General TIMOTHY FROEHLE	
4	Deputy Attorney General State Bar No. 279337	
5	1515 Clay Street, 20th Floor P.O. Box 70550	
6	Oakland, CA 94612-0550 Telephone: (510) 879-0004	
7	Facsimile: (510) 622-2270 E-mail: Tim.Froehle@doj.ca.gov	
8	Attorneys for Complainant	
9	BEFOR	
10	BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS	
11	STATE OF CALIFORNIA	
12		
13	In the Matter of the Accusation Against:	Case No. 6819
14	JAJCO INC. DBA ANCHOR DRUGS III; KANAAN PAUL JAJEH FAMILY TRUST	STIPULATED SETTLEMENT AND DISCIPLINARY ORDER FOR PUBLIC
15	and RAYMOND PAUL JAJEH, Owners 161 S. Spruce Avenue	REPROVAL
16	South San Francisco, CA 94080	[Bus. & Prof. Code § 495]
17	Original Permit No. PHY 48787,	
18	and	
19	RAYMOND PAUL JAJEH 161 S. Spruce Avenue	
20	South San Francisco, CA 94080	
21	Pharmacist License No. RPH 47418	
22	Respondents.	
23		
24	IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-	
25	entitled proceedings that the following matters are true:	
26	PARTIES	
27		Executive Officer of the Board of Pharmacy
28	(Board). She brought this action solely in her off	cial capacity and is represented in this matter by
		1
	STIP SETTLEMEN	T & DISC ORDER FOR PUBLIC REPROVAL (6819)

Xavier Becerra, Attorney General of the State of California, by Timothy Froehle, Deputy 2 Attorney General.

2. Respondents Jajco Inc. dba Anchor Drugs III, Kanaan Paul Jajeh Family Trust and 3 Raymond Paul Jajeh, Owners and Raymond Paul Jajeh (Respondent Jejeh) are represented in this 4 proceeding by attorney Anne Marchant of Klein, Hockel, Iezza & Patel, P.C., 1981 North 5 Broadway, Suite 220, Walnut Creek, CA 94596. 6

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JURISDICTION

3. On or about January 30, 2009, the Board of Pharmacy issued Original Permit 8 9 Number PHY 48787 to Jajco Inc. dba Anchor Drugs III with Raymond Paul Jajeh designated as Pharmacist in Charge since November 1, 2014, as well as President and 49-percent shareholder 10 since April 3, 2015, and with Kanaan Paul Jajeh Family Trust as 51-percent shareholder since 11 April 3, 2015 (Respondent Pharmacy). The Original Permit was in full force and effect at all 12 times relevant to the charges brought here and will expire on January 1, 2021, unless renewed. 13 4. On or about August 5, 1994, the Board of Pharmacy issued Pharmacist License 14 Number RPH 47418 to Respondent Jajeh. The Pharmacist License was in full force and effect at 15 all times relevant to the charges brought here and will expire on March 31, 2022, unless renewed. 16 5. Second Amended Accusation No. 6819 was filed before the Board of Pharmacy 17 (Board), Department of Consumer Affairs and is currently pending against Respondents. The 18 Second Amended Accusation and all other statutorily required documents were properly served 19 on Respondents on December 13, 2019. Respondents timely filed their Notice of Defense 20contesting the Second Amended Accusation. A copy of Second Amended Accusation No. 6819 21

22 23

ADVISEMENT AND WAIVERS

24 6. Respondents have carefully read, fully discussed with counsel, and understands the charges and allegations in Second Amended Accusation No. 6819. Respondents have also 25 carefully read, fully discussed with counsel, and understands the effects of this Stipulated 26 Settlement and Disciplinary Order for Public Reproval. 27

is attached as Exhibit A and incorporated here by reference.

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1	7. Respondents are fully aware of its legal rights in this matter, including the right to a	
2	hearing on the charges and allegations in the Second Amended Accusation; the right to be	
3	represented by counsel at its own expense; the right to confront and cross-examine the witnesses	
4	against them; the right to present evidence and to testify on its own behalf; the right to the	
5	issuance of subpoenas to compel the attendance of witnesses and the production of documents;	
6	the right to reconsideration and court review of an adverse decision; and all other rights accorded	
7	by the California Administrative Procedure Act and other applicable laws.	
8	8. Respondents voluntarily, knowingly, and intelligently waive and give up each and	
9	every right set forth above.	
10	<u>CULPABILITY</u>	
11	9. Respondents understand and agree that the charges and allegations in Scond	
12	Amended Accusation No. 6819, if proven at hearing, constitute cause for imposing discipline	
13	upon their Original Permit and Pharmacist License, respectively.	
14	10. For the purpose of resolving Second Amended Accusation No. 6819 with the expense	
15	and uncertainty of further proceedings, Respondents hereby give up their rights to contest those	
16	charges and allegations in Second Amended Accusation No. 6819.	
17	11. Respondents agree that their Original Permit and Pharmacist License, respectively, is	
18	subject to discipline and they agree to be bound by the Disciplinary Order below.	
19	12. Respondents agree that in any future disciplinary proceeding before the Board against	
20	Respondent the allegations set forth in Second Amended Accusation No. 6819 shall be deemed	
21	admitted.	
22	RESERVATIONS	
23	13. The admissions made by Respondents here are only for the purposes of this	
24	proceeding or any other proceedings in which the Board of Pharmacy, or other professional	
25	licensing agency, is involved, and shall not be admissible in any other criminal or civil	
26	proceeding.	
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	STIP SETTLEMENT & DISC ORDER FOR PUBLIC REPROVAL (6819)	

1	<u>CONTINGENCY</u>	
2	14. This stipulation shall be subject to approval by the Board of Pharmacy. Respondents	
3	understand and agree that counsel for Complainant and the staff of the Board of Pharmacy may	
4	communicate directly with the Board regarding this stipulation and settlement, without notice to	
5	or participation by Respondents or their counsel. By signing the stipulation, Respondents	
6	understand and agree that they may not withdraw their agreement or seek to rescind the	
7	stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this	
8	stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order for Public	
9	Reproval shall be of no force or effect, except for this paragraph, it shall be inadmissible in any	
10	legal action between the parties, and the Board shall not be disqualified from further action by	
11	having considered this matter.	
12	15. The parties understand and agree that Portable Document Format (PDF) and facsimile	
13	copies of this Stipulated Settlement and Disciplinary Order for Public Reproval, including	
14	Portable Document Format (PDF) and facsimile signatures thereto, shall have the same force and	
15	effect as the originals.	
16	16. This Stipulated Settlement and Disciplinary Order for Public Reproval is intended by	
17	the parties to be an integrated writing representing the complete, final, and exclusive embodiment	
18	of their agreement. It supersedes any and all prior or contemporaneous agreements,	
19	understandings, discussions, negotiations, and commitments (written or oral). This Stipulated	
20	Settlement and Disciplinary Order for Public Reproval may not be altered, amended, modified,	
21	supplemented, or otherwise changed except by a writing executed by an authorized representative	
22	of each of the parties.	
23	17. In consideration of the foregoing admissions and stipulations, the parties agree that	
24	the Board may, without further notice or formal proceeding, issue and enter the following	
25	Disciplinary Order:	
26	DISCIPLINARY ORDER	
27	IT IS HEREBY ORDERED that Original Permit No. PHY 48787, issued to Respondent	
28	Pharmacy, and Pharmacist License No. RPH 47418, issued to Respondent Jajeh, shall be publicly	
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	STIP SETTLEMENT & DISC ORDER FOR PUBLIC REPROVAL (6819)	

reproved by the Board of Pharmacy under Business and Professions Code section 495 in resolution of Second Accusation No. 6819, attached as Exhibit A. This decision constitutes a record of discipline and shall become a part of Respondents' license history with the Board.

Cost Recovery. Respondents shall pay \$5,761.50 to the Board for its costs associated with the investigation and enforcement of this matter. Respondents shall be permitted to pay these costs in a payment plan approved by the Board. If Respondents fail to pay the Board costs as ordered, Respondents shall not be allowed to renew their Original Permit or Pharmacist license until Respondents pay costs in full.

Full Compliance. As a resolution of the charges in Second Accusation No. 6819, this
stipulated settlement is contingent upon Respondents' full compliance with all conditions of this
Order. If Respondents fail to satisfy any of these conditions, such failure to comply constitutes
cause for discipline, including outright revocation, of Respondent Pharmacy's Original Permit
No. PHY 48787 and Respondent Jajeh's Pharmacist License No. RPH 47418.

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ACCEPTANCE

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I have carefully read the above Stipulated Settlement and Disciplinary Order for Public Reproval and have fully discussed it with my attorney, Anne Marchant. I understand the stipulation and the effect it will have on my Original Permit. I enter into this Stipulated Settlement and Disciplinary Order for Public Reproval voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: <u>9/30/2020</u>

On behalf of JAJCO INC. DBA ANCHOR DRUGS III, KANAAN PAUL JAJEH FAMILY TRUST AND RAYMOND PAUL JAJEH, OWNERS Respondent

STIP SETTLEMENT & DISC ORDER FOR PUBLIC REPROVAL (6819)

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

9/30/2020 DATED:

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RAYMÓND PAUL JAJEH Respondent

I have read and fully discussed with Respondent Jajco Inc. dba Anchor Drugs III, Kanaan Paul Jajeh Family Trust and Raymond Paul Jajeh, Owners, and Raymond Paul Jajeh 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:

Attorney for Respondents

ENDORSEMENT

17 The foregoing Stipulated Settlement and Disciplinary Order for Public Reproval is hereby 18 respectfully submitted for consideration by the Board of Pharmacy of the Department of 19 Consumer Affairs. 20 21 DATED: · Respectfully submitted, 22 XAVIER BECERRA Attorney General of California 23 DIANN SOKOLOFF Supervising Deputy Attorney General 24 25 26 TIMOTHY FROEHLE Deputy Attorney General 27 Attorneys for Complainant 28 OK2019900565/91251946.docx 6 STIP SETTLEMENT & DISC ORDER FOR PUBLIC REPROVAL (6819)

1	I have carefully read the above Stipulated Settlement and Disciplinary Order for Public		
2	Reproval and have fully discussed it with my attorney, Anne Marchant. I understand the		
3	stipulation and the effect it will have on my Pharmacist License. I enter into this Stipulated		
4	Settlement and Disciplinary Order for Public Reproval voluntarily, knowingly, and intelligently,		
5	and agree to be bound by the Decision and Order of the Board of Pharmacy.		
6			
7	DATED:		
8	RAYMOND PAUL JAJEH Respondent		
9 10	I have read and fully discussed with Respondent Jajco Inc. dba Anchor Drugs III, Kanaan Paul Jajeh Family Trust and Raymond Paul Jajeh, Owners, and Raymond Paul Jajeh the terms		
11	and conditions and other matters contained in the above Stipulated Settlement and Disciplinary		
12	Order for Public Reproval. I approve its form and content.		
13	DATED:		
14	ANNE MARCHANT Attorney for Respondents		
15 16			
10	ENDORSEMENT		
18	The foregoing Stipulated Settlement and Disciplinary Order for Public Reproval is hereby		
19	respectfully submitted for consideration by the Board of Pharmacy of the Department of		
20	Consumer Affairs.		
21	DATED: October 30, 2020 Respectfully submitted,		
22	XAVIER BECERRA		
23	Attorney General of California DIANN SOKOLOFF Supervising Deputy Attorney General		
24 25	Anthey S. L.		
26	for TIMOTHY FROEHLE		
27	Deputy Attorney General Attorneys for Complainant		
28	OK2019900565/91251946.docx		
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	STIP SETTLEMENT & DISC ORDER FOR PUBLIC REPROVAL (6819)		

Exhibit A

Second Amended Accusation No. 6819

1	XAVIER BECERRA	
2	Attorney General of California DIANN SOKOLOFF	
3	Supervising Deputy Attorney General TIMOTHY FROEHLE	
4	Deputy Attorney General State Bar No. 279337	
5	1515 Clay Street, 20th Floor P.O. Box 70550	
6	Oakland, CA 94612-0550 Telephone: (510) 879-0004	
7	Facsimile: (510) 622-2270 E-mail: Tim.Froehle@doj.ca.gov	
8	Attorneys for Complainant	
9	BEFORE THE	
10	BOARD OF PHARMACY DEPARTMENT OF CONSUMER AFFAIRS	
11	STATE OF C	
12		
13	In the Matter of the Accusation Against:	Case No. 6819
14	JAJCO INC. DBA ANCHOR DRUGS III; KANAAN PAUL JAJEH FAMILY TRUST	
15	and RAYMOND PAUL JAJEH, Owners 161 S. Spruce Avenue	SECOND AMENDED ACCUSATION
16	South San Francisco, CA 94080	
17	Original Permit No. PHY 48787,	
18	and	
19	RAYMOND PAUL JAJEH 161 S. Spruce Avenue	
20	South San Francisco, CA 94080	
21	Pharmacist License No. RPH 47418	
22	Respondents.	
23		
24	PART	
25		s this Second Amended Accusation solely in her
26	official capacity as the Executive Officer of the B	oard of Pharmacy, Department of Consumer
27	Affairs.	
28		1
		and RAYMOND PAUL JAJEH) SECOND AMENDED ACCUSATION

1	2. On or about January 30, 2009, the Board of Pharmacy issued Original Permit
2	Number PHY 48787 to Jajco Inc. dba Anchor Drugs III with Raymond Paul Jajeh designated as
3	Pharmacist in Charge since November 1, 2014, as well as President and 49-percent shareholder
4	since April 3, 2015, and with Kanaan Paul Jajeh Family Trust as 51-percent shareholder since
5	April 3, 2015 (Respondent Pharmacy). The Original Permit was in full force and effect at all
6	times relevant to the charges brought here and will expire on January 1, 2021, unless renewed.
7	3. On or about August 5, 1994, the Board of Pharmacy issued Pharmacist License
8	Number RPH 47418 to Raymond Paul Jajeh (Respondent Jajeh). The Pharmacist License was in
9	full force and effect at all times relevant to the charges brought here and will expire on March 31,
10	2020, unless renewed.
11	JURISDICTION
12	4. This Second Amended Accusation is brought before the Board of Pharmacy (Board),
13	Department of Consumer Affairs, under the authority of the following laws. All section
14	references are to the Business and Professions Code (Code) unless otherwise indicated.
15	5. Section 4113, subdivision (c), of the Code, states, in pertinent part:
16	"(c) The pharmacist-in-charge shall be responsible for a pharmacy's compliance with all
17	state and federal laws and regulations pertaining to the practice of pharmacy."
18	6. Section 4300, subdivision (a), of the Code provides that every license issued by the
19	Board may be suspended or revoked.
20	7. Section 4300.1 of the Code states:
21	"The expiration, cancellation, forfeiture, or suspension of a board-issued license by
22	operation of law or by order or decision of the board or a court of law, the placement of a license
23	on a retired status, or the voluntary surrender of a license by a licensee shall not deprive the board
24	of jurisdiction to commence or proceed with any investigation of, or action or disciplinary
25	proceeding against, the licensee or to render a decision suspending or revoking the license."
26	8. Section 4307, subdivision (a), of the Code states:
27	"Any person who has been denied a license or whose license has been revoked or is under
28	suspension, or who has failed to renew his or her license while it was under suspension, or who
	(LA ICO INC. DDA, ANCHOR DDUCS III and DAVMOND DALIL LA IEU) SECOND, AMENDED
	(JAJCO INC. DBA ANCHOR DRUGS III and RAYMOND PAUL JAJEH) SECOND AMENDED ACCUSATION

1	has been a manager, administrator, owner, member, officer, director, associate, partner, or any
2	other person with management or control of any partnership, corporation, trust, firm, or
3	association whose application for a license has been denied or revoked, is under suspension or has
4	been placed on probation, and while acting as the manager, administrator, owner, member,
5	officer, director, associate, partner, or any other person with management or control had
6	knowledge of or knowingly participated in any conduct for which the license was denied,
7	revoked, suspended, or placed on probation, shall be prohibited from serving as a manager,
8	administrator, owner, member, officer, director, associate, partner, or in any other position with
9	management or control of a licensee as follows:
10	"(1) Where a probationary license is issued or where an existing license is placed on
11	probation, this prohibition shall remain in effect for a period not to exceed five years.
12	"(2) Where the license is denied or revoked, the prohibition shall continue until the license
13	is issued or reinstated."
14	STATUTORY PROVISIONS
15	9. Section 4301 of the Code states, in pertinent part:
16	"The board shall take action against any holder of a license who is guilty of unprofessional
17	conduct or whose license has been issued by mistake. Unprofessional conduct shall include, but is
18	not limited to, any of the following:
19	
20	"(o) Violating or attempting to violate, directly or indirectly, or assisting in or
21	abetting the violation of or conspiring to violate any provision or term of this chapter or of the
22	applicable federal and state laws and regulations governing pharmacy, including regulations
23	established by the board or by any other state or federal regulatory agency.
24	"
25	REGULATORY PROVISIONS
25 26	REGULATORY PROVISIONS10. California Code of Regulations, title 16, section 1707.3, states:
26	10. California Code of Regulations, title 16, section 1707.3, states:
26 27	

1	"Prior to consultation as set forth in section 1707.2, a pharmacist shall review a patient's
2	drug therapy and medication record before each prescription drug is delivered. The review shall
3	include screening for severe potential drug therapy problems."
4	11. California Code of Regulations, title 16, section 1716, states:
5	"Pharmacists shall not deviate from the requirements of a prescription except upon the prior
6	consent of the prescriber or to select the drug product in accordance with Section 4073 of the
7	Business and Professions Code.
8	"Nothing in this regulation is intended to prohibit a pharmacist from exercising commonly-
9	accepted pharmaceutical practice in the compounding or dispensing of a prescription."
10	12. California Code of Regulations, title 16, section 1735.2, subdivision (i), states, in
11	pertinent part:
12	"(i) Every compounded drug preparation shall be given a beyond use date representing the
13	date or date and time beyond which the compounded drug preparation should not be used, stored,
14	transported or administered, and determined based on the professional judgment of the pharmacist
15	performing or supervising the compounding.
16	(1) For non-sterile compounded drug preparation(s), the beyond use date shall not
17	exceed any of the following:
18	(A) the shortest expiration date or beyond use date of any ingredient in the
19	compounded drug preparation,
20	
21	<u>COST RECOVERY</u>
22	13. Section 125.3 of the Code states, in pertinent part, that the Board may request the
23	administrative law judge to direct a licentiate found to have committed a violation or violations of
24	the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
25	enforcement of the case.
26	DEFINITIONS
27	14. Warfarin, also known by the brand name Coumadin, is a dangerous drug under
28	Business and Professions Code section 4022. It is used as a blood thinner.
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	(JAJCO INC. DBA ANCHOR DRUGS III and RAYMOND PAUL JAJEH) SECOND AMENDED ACCUSATION

1	FIRST CAUSE FOR DISCIPLINE
2	(Variation from Prescription)
3	15. Respondent Pharmacy has subjected its pharmacy permit to discipline, and
4	Respondent Jajeh has subjected his pharmacist license to discipline, because Respondents
5	deviated from the requirements of a prescription. (Bus. & Prof. Code, § 4301, subd. (o); Cal.
6	Code Regs., tit. 16, §§ 1707.3, 1716.) Respondent Jajeh is responsible as pharmacist in charge.
7	(Bus. & Prof. Code, § 4113, subd. (c).) The circumstances are as follows:
8	16. On or about September 4, 2018, a pharmacist working for Respondent Pharmacy
9	verified and dispensed a prescription incorrectly to patient M.S. The prescription was written for
10	Coumadin 5 mg, but the pharmacy staff typed and dispensed warfarin 1 mg tablets. This caused
11	patient M.S. to ingest the wrong medication for approximately 20 days.
12	17. Additionally, in filling the prescription, Respondent Pharmacy's pharmacist failed to
13	review patient M.S.'s drug therapy and medication records, which indicated that M.S. had been
14	taking Coumadin 5 mg tablets since January 2016.
15	SECOND CAUSE FOR DISCIPLINE
16	(Compounding Limitations and Requirements)
17	18. Respondent Pharmacy has subjected its pharmacy permit to discipline, and
18	Respondent Jajeh has subjected his pharmacist license to discipline, because Respondents
19	assigned beyond-use dates on compounded drug preparations that exceeded the expiration dates
20	of the ingredients used to prepare the product. (Bus. & Prof. Code, § 4301, subd. (o); Cal. Code
21	Regs., tit. 16, §§ 1735.2, subd. (i)(1)(A).) Respondent Jajeh is responsible as pharmacist in
22	charge. (Bus. & Prof. Code, § 4113, subd. (c).) The circumstances are as follows:
23	19. On or about December 13, 2018, during a routine inspection of Respondent
24	Pharmacy, the Board's inspector reviewed Respondents' compounding records. The inspector
25	found that multiple records of compounded drug preparations prepared between November 1,
26	2018, and December 13, 2018, were assigned beyond-use dates to the finished product that
27	exceeded the shortest beyond-use date of the ingredients used in the preparation.
28	///
	5 (JAJCO INC. DBA ANCHOR DRUGS III and RAYMOND PAUL JAJEH) SECOND AMENDED
	(JAJCO INC. DBA ANCHOR DROUS III and RATMOND TAOL JAJEN) SECOND AMENDED ACCUSATION

1	OTHER MATTERS
2	20. Pursuant to Code section 4307, if discipline is imposed on Original Permit Number
3	PHY 48787, issued to Jajco Inc. dba Anchor Drugs III, Jajco Inc. shall be prohibited from serving
4	as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee
5	for five years if Original Permit Number PHY 48787 is placed on probation or until Original
6	Permit Number PHY 48787 is reinstated if it is revoked.
7	21. Pursuant to Code section 4307, if discipline is imposed on Original Permit Number
8	PHY 48787, issued to Jajco Inc. dba Anchor Drugs III, while Respondent Jajeh and/or the
9	Kanaan Paul Jajeh Family Trust have been owner and had knowledge of or knowingly
10	participated in any conduct for which the licensee was disciplined, Respondent Jajeh and/or
11	persons with management or control of Kanaan Paul Jajeh Family Trust shall be prohibited from
12	serving as a manager, administrator, owner, member, officer, director, associate, or partner of a
13	licensee for five years if Original Permit Number PHY 48787 is placed on probation or until
14	Original Permit Number PHY 48787 is reinstated if it is revoked.
15	DISCIPLINE CONSIDERATIONS
16	22. To determine the degree of discipline, if any, to be imposed on Respondent
17	Pharmacy, Complainant alleges that on or about March 6, 2017, in a prior action, the Board of
18	Pharmacy issued Citation Number CI 2016 74345 to Respondent Pharmacy. That Citation is now
19	final.
20	23. To determine the degree of discipline, if any, to be imposed on Respondent Jajeh,
21	Complainant alleges that on or about March 6, 2017, in a prior action, the Board of Pharmacy
22	issued Citation Number CI 2016 74346, requiring Respondent Jajeh to pay a fine of \$2,500.00.
23	That Citation is now final.
24	PRAYER
25	WHEREFORE, Complainant requests that a hearing be held on the matters alleged, and
26	that following the hearing, the Board of Pharmacy issue a decision:
27	1. Revoking or suspending Original Permit Number PHY 48787, issued to Jajco Inc.
28	dba Anchor Drugs III;
	6
	(JAJCO INC. DBA ANCHOR DRUGS III and RAYMOND PAUL JAJEH) SECOND AMENDED ACCUSATION

2. Revoking or suspending Pharmacist License Number RPH 47418, issued to Raymond Paul Jajeh;

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3. Prohibiting Jajco Inc. from serving as a manager, administrator, owner, member,
 officer, director, associate, or partner of a licensee for five years if Original Permit Number PHY
 48787 is placed on probation or until Original Permit Number PHY 48787 is reinstated if Original
 Permit Number 48787 issued to Jajco Inc. dba Anchor Drugs III is revoked.

4. Prohibiting Raymond Paul Jajeh from serving as a manager, administrator, owner, 7 8 member, officer, director, associate, or partner of a licensee for five years if Original Permit 9 Number PHY 48787 is placed on probation or until Original Permit Number PHY 48787 is reinstated if Original Permit Number 48787 issued to Jajco Inc. dba Anchor Drugs III is revoked. 10 5. Prohibiting the Kanaan Paul Jajeh Family Trust and any persons with management or 11 control of Kanaan Paul Jajeh Family Trust from serving as a manager, administrator, owner, 12 member, officer, director, associate, or partner of a licensee for five years if Original Permit 13 14 Number PHY 48787 is placed on probation or until Original Permit Number PHY 48787 is reinstated if Original Permit Number 48787 issued to Jajco Inc. dba Anchor Drugs III is revoked. 15 Ordering Jajco Inc. and Raymond Paul Jajeh to pay the Board of Pharmacy the 6. 16 reasonable costs of the investigation and enforcement of this case, pursuant to Business and 17 Professions Code section 125.3; and, 18 7. 19 Taking such other and further action as deemed necessary and proper. 20 21 Anne Sodergren 22 DATED: 9/21/2020 23 ANNE SODERGREN **Executive Officer** 24 Board of Pharmacy Department of Consumer Affairs 25 State of California Complainant 26 27 OK2019900565 28 91280323.docx 7 (JAJCO INC. DBA ANCHOR DRUGS III and RAYMOND PAUL JAJEH) SECOND AMENDED

ACCUSATION