

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

In the Matter of the Accusation Against:

NATALYA IGNATYEVA, INT 39269

Respondent

Case number 6947

OAH No. 2020100073

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective at 5:00 p.m. on February 11, 2021.

It is so ORDERED on January 12, 2021.

BOARD OF PHARMACY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA



By

Greg Lippe
Board President

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

13 In the Matter of the Accusation Against:

14 **NATALYA IGNATYEVA**
15 9475 Maler Road
San Diego, CA 92129

16 Intern Pharmacist Registration Number INT
17 39269

18 Respondent.

Case Number 6947

OAH Number 2020100073

19
20 **STIPULATED SETTLEMENT AND**
21 **DISCIPLINARY ORDER**

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

24 **PARTIES**

25 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy
26 (Board). She brought this action solely in her official capacity and is represented in this matter by
27 Xavier Becerra, Attorney General of the State of California, by Daniel J. Cross, Deputy Attorney
28 General.

2. Respondent Natalya Ignatyeva (Respondent) is representing herself in this proceeding
and has chosen not to exercise her right to be represented by counsel.

1 3. On October 17, 2016, the Board issued Intern Pharmacist Registration Number INT
2 39269 to Respondent. The Intern Pharmacist Registration was in full force and effect at all times
3 relevant to the charges brought in Accusation Number 6947, and will expire on May 31, 2021,
4 unless renewed.

5 **JURISDICTION**

6 4. Accusation Number 6947 was filed before the Board, and is currently pending against
7 Respondent. The Accusation and all other statutorily required documents were properly served
8 on Respondent on August 28, 2020. Respondent timely filed her Notice of Defense contesting
9 the Accusation.

10 5. A copy of Accusation Number 6947 is attached as Exhibit A and incorporated herein
11 by reference.

12 **ADVISEMENT AND WAIVERS**

13 6. Respondent has carefully read, and understands the charges and allegations in
14 Accusation Number 6947. Respondent has also carefully read, and understands the effects of this
15 Stipulated Settlement and Disciplinary Order.

16 7. Respondent is fully aware of her legal rights in this matter, including the right to a
17 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
18 her own expense; the right to confront and cross-examine the witnesses against her; the right to
19 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
20 compel the attendance of witnesses and the production of documents; the right to reconsideration
21 and court review of an adverse decision; and all other rights accorded by the California
22 Administrative Procedure Act and other applicable laws.

23 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each right
24 set forth above.

25 **CULPABILITY**

26 9. Respondent admits the truth of every charge and allegation in Accusation Number
27 6947.

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1 is placed on probation for five years on the following terms and conditions:

2 **STANDARD CONDITIONS OF PROBATIONS**

3 **1. Suspension**

4 As part of probation, Respondent is suspended from practice as an Intern Pharmacist
5 beginning the effective date of this decision and continuing until the Pharmacists Recovery
6 Program deems Respondent safe to practice.

7 During suspension, Respondent shall not enter any pharmacy area or any portion of the
8 licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug
9 retailer, or any other distributor of drugs that is licensed by the Board, or any manufacturer, or
10 any area where dangerous drugs and/or dangerous devices or controlled substances are
11 maintained.

12 Respondent shall not practice pharmacy nor do any act involving drug selection, selection
13 of stock, manufacturing, compounding, dispensing, or patient consultation; nor shall Respondent
14 manage, administer, or be a consultant to any licensee of the Board, or have access to or control
15 the ordering, distributing, manufacturing, or dispensing of dangerous drugs, dangerous devices, or
16 controlled substances.

17 During this suspension, Respondent shall not engage in any activity that requires the
18 professional judgment of, or licensure as, an Intern Pharmacist. Respondent shall not direct or
19 control any aspect of the practice of pharmacy or of the manufacturing, distributing, wholesaling,
20 or retailing of dangerous drugs, dangerous devices, or controlled substances.

21 Failure to comply with this suspension shall be considered a violation of probation.

22 **2. Obey All Laws**

23 Respondent shall obey all state and federal laws and regulations.

24 Respondent shall report any of the following occurrences to the Board, in writing, within 72
25 hours of such occurrence:

- 26 • an arrest or issuance of a criminal complaint for violation of any provision of the
27 Pharmacy Law, state and federal food and drug laws, or state and federal controlled
28 substances laws;

- 1 • a plea of guilty, nolo contendere, no contest, or similar plea, in any state or federal
- 2 criminal proceeding to any criminal complaint, information, or indictment;
- 3 • a conviction of any crime; and
- 4 • the filing of a disciplinary pleading, issuance of a citation, or initiation of another
- 5 administrative action filed by any state or federal agency that involves Respondent's
- 6 license or is related to the practice of pharmacy or the manufacturing, obtaining,
- 7 handling, distributing, billing, or charging for any drug, device, or controlled
- 8 substance.

9 Failure to timely report such occurrence shall be considered a violation of probation.

10 3. Report to the Board

11 Respondent shall report to the Board quarterly, on a schedule as directed by the Board or its
12 designee. The report shall be made either in person or in writing, as directed. Among other
13 requirements, Respondent shall state in each report under penalty of perjury whether there has
14 been compliance with all the terms and conditions of probation.

15 Failure to submit timely reports in a form as directed shall be considered a violation of
16 probation. Any period of delinquency in submission of reports as directed may be added to the
17 total period of probation. Moreover, if the final probation report is not made as directed,
18 probation shall be automatically extended until such time as the final report is made and accepted
19 by the Board.

20 4. Interview with the Board

21 Upon receipt of reasonable prior notice, Respondent shall appear in person for interviews
22 with the Board or its designee, at such intervals and locations as are determined by the Board or
23 its designee. Failure to appear for any scheduled interview without prior notification to Board
24 staff, or failure to appear for two or more scheduled interviews with the Board or its designee
25 during the period of probation, shall be considered a violation of probation.

26 5. Cooperate with Board Staff

27 Respondent shall timely cooperate with the Board's inspection program and with the
28 Board's monitoring and investigation of Respondent's compliance with the terms and conditions

1 of probation, including but not limited to: timely responses to requests for information by Board
2 staff; timely compliance with directives from Board staff regarding requirements of any term or
3 condition of probation; and timely completion of documentation pertaining to a term or condition
4 of probation. Failure to timely cooperate shall be considered a violation of probation.

5 **6. Reporting of Employment and Notice to Employers**

6 During the period of probation, Respondent shall notify all present and prospective
7 employers of the decision in Case Number 6947 and the terms, conditions and restrictions
8 imposed on Respondent by the decision, as follows:

9 Within 30 days of the effective date of this decision, and within 10 days of undertaking any
10 new employment, Respondent shall report to the Board in writing the name, physical address, and
11 mailing address of her employer, and the name and telephone number of all of her direct
12 supervisors, as well as any pharmacist-in-charge, designated representative-in-charge,
13 responsible manager, or other compliance supervisor and the work schedule, if known.

14 Respondent shall also include the reason for leaving her prior employment. Respondent shall
15 sign and return to the Board a written consent authorizing the Board or its designee to
16 communicate with all of Respondent's employers and supervisors, and authorizing those
17 employers or supervisors to communicate with the Board or its designee, concerning
18 Respondent's work status, performance, and monitoring. Failure to comply with the requirements
19 or deadlines of this condition shall be considered a violation of probation.

20 Within 30 days of the effective date of this decision, and within 15 days of Respondent
21 undertaking any new employment, Respondent shall cause (a) her direct supervisor, (b) her
22 pharmacist-in-charge, designated representative-in-charge, responsible manager, or other
23 compliance supervisor, and (c) the owner or owner representative of her employer, to report to the
24 Board in writing acknowledging that the listed individuals have read the decision in Case Number
25 6947, and the terms and conditions imposed thereby. If one person serves in more than one role
26 described in (a), (b), or (c), the acknowledgment shall so state. It shall be the Respondent's
27 responsibility to ensure that these acknowledgments are timely submitted to the Board. In the
28 event of a change in the persons serving the roles described in (a), (b), or (c) during the term of

1 probation, Respondent shall cause the person taking over the role to report to the Board in writing
2 within 15 days of the change acknowledging that he or she has read the decision in Case Number
3 6947, and the terms and conditions imposed thereby.

4 If Respondent works for or is employed by or through an employment service, Respondent
5 must notify the persons described in (a), (b), and (c) above at every entity licensed by the Board
6 of the decision in Case Number 6947, and the terms and conditions imposed thereby in advance
7 of Respondent commencing work at such licensed entity. A record of this notification must be
8 provided to the Board upon request.

9 Furthermore, within 30 days of the effective date of this decision, and within 15 days of
10 Respondent undertaking any new employment by or through an employment service, Respondent
11 shall cause the persons described in (a), (b), and (c) above at the employment service to report to
12 the Board in writing acknowledging that he or she has read the decision in Case Number 6947,
13 and the terms and conditions imposed thereby. It shall be Respondent's responsibility to ensure
14 that these acknowledgments are timely submitted to the Board.

15 Failure to timely notify present or prospective employers or failure to cause the identified
16 persons with those employers to submit timely written acknowledgments to the Board shall be
17 considered a violation of probation.

18 "Employment" within the meaning of this provision includes any full-time, part-time,
19 temporary, relief, or employment/management service position as an Intern Pharmacist, or any
20 position for which an Intern Pharmacist Registration is a requirement or criterion for
21 employment, whether the Respondent is an employee, independent contractor, or volunteer.

22 **7. Notification of Changes in Name, Address, or Phone Number**

23 Respondent shall further notify the Board in writing within 10 days of any change in name,
24 residence address, mailing address, e-mail address, or phone number.

25 Failure to timely notify the Board of any change in employer, name, address, or phone
26 number shall be considered a violation of probation.

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1 **8. Reimbursement of Board Costs**

2 As a condition precedent to successful completion of probation, Respondent shall pay to the
3 Board its costs of investigation and prosecution in the amount of \$5,000.00. Respondent shall be
4 permitted to pay these costs in a payment plan approved by the Board or its designee, so long as
5 full payment is completed no later than one year prior to the end date of probation. There shall be
6 no deviation from the schedule absent prior written approval by the Board or its designee. Failure
7 to pay costs by the deadlines as directed shall be considered a violation of probation.

8 **9. Probation Monitoring Costs**

9 Respondent shall pay any costs associated with probation monitoring as determined by the
10 Board each year of probation. Such costs shall be payable to the Board on a schedule as directed
11 by the Board or its designee. Failure to pay such costs by the deadlines as directed shall be
12 considered a violation of probation.

13 **10. Status of License**

14 Respondent shall, at all times while on probation, maintain an active, current Intern
15 Pharmacist Registration with the Board, including any period during which suspension or
16 probation is tolled. Failure to maintain an active, current Intern Pharmacist Registration shall be
17 considered a violation of probation.

18 If Respondent's Intern Pharmacist Registration expires or is cancelled by operation of law
19 or otherwise at any time during the period of probation, including any extensions thereof due to
20 tolling or otherwise, upon renewal or reapplication Respondent's license shall be subject to all
21 terms and conditions of this probation not previously satisfied.

22 **11. License Surrender While on Probation/Suspension**

23 Following the effective date of this decision, should Respondent cease practice due to
24 retirement or health, or be otherwise unable to satisfy the terms and conditions of probation,
25 Respondent may relinquish her license, including any indicia of licensure issued by the Board,
26 along with a request to surrender the license. The Board or its designee shall have the discretion
27 whether to accept the surrender or take any other action it deems appropriate and reasonable.
28 Upon formal acceptance of the surrender of the license, Respondent will no longer be subject to

1 the terms and conditions of probation. This surrender constitutes a record of discipline and shall
2 become a part of the Respondent's license history with the Board.

3 Upon acceptance of the surrender, Respondent shall relinquish her pocket and wall license,
4 including any indicia of licensure not previously provided to the Board within 10 days of
5 notification by the Board that the surrender is accepted if not already provided. Respondent may
6 not reapply for any license from the Board for three years from the effective date of the surrender.
7 Respondent shall meet all requirements applicable to the license sought as of the date the
8 application for that license is submitted to the Board, including any outstanding costs.

9 **12. Practice Requirement – Extension of Probation**

10 Except during periods of suspension, Respondent shall, at all times while on probation, be
11 employed as an Intern Pharmacist in California for a minimum of 80 hours per calendar month.
12 Any month during which this minimum is not met shall extend the period of probation by one
13 month. During any such period of insufficient employment, Respondent must nonetheless
14 comply with all terms and conditions of probation, unless Respondent receives a waiver in
15 writing from the Board or its designee.

16 If Respondent does not practice as an Intern Pharmacist in California for the minimum
17 number of hours in any calendar month, for any reason (including vacation), Respondent shall
18 notify the Board in writing within 10 days of the conclusion of that calendar month. This
19 notification shall include at least: the dates, locations, and hours of last practice; the reason for the
20 interruption or reduction in practice; and the anticipated date on which Respondent will resume
21 practice at the required level. Respondent shall further notify the Board in writing within 10 days
22 following the next calendar month during which Respondent practices as an Intern Pharmacist in
23 California for the minimum of hours. Any failure to timely provide such notifications shall be
24 considered a violation of probation.

25 It is a violation of probation for Respondent's probation to be extended pursuant to the
26 provisions of this condition for a total period, counting consecutive and non-consecutive months,
27 exceeding 36 months. The Board or its designee may post a notice of the extended probation
28 period on its website.

1 During Respondent's enrollment in a school or college of pharmacy, no minimum practice
2 hours shall be required. Instead, Respondent shall report to the Board quarterly in writing, in a
3 format and schedule as directed by the Board or its designee, on her compliance with academic
4 and vocational requirements, and on her academic progress. Respondent must comply with all
5 other terms and conditions of probation, unless notified in writing by the Board or its designee.

6 **13. Violation of Probation**

7 If Respondent has not complied with any term or condition of probation, the Board shall
8 have continuing jurisdiction over Respondent, and the Board shall provide notice to Respondent
9 that probation shall automatically be extended, until all terms and conditions have been satisfied
10 or the Board has taken other action as deemed appropriate to treat the failure to comply as a
11 violation of probation, to terminate probation, and to impose the penalty that was stayed. The
12 Board or its designee may post a notice of the extended probation period on its website.

13 If Respondent violates probation in any respect, the Board, after giving Respondent notice
14 and an opportunity to be heard, may revoke probation and carry out the disciplinary order that
15 was stayed. If a petition to revoke probation or an accusation is filed against Respondent during
16 probation, or the preparation of an accusation or petition to revoke probation is requested from
17 the Office of the Attorney General, the Board shall have continuing jurisdiction and the period of
18 probation shall be automatically extended until the petition to revoke probation or accusation is
19 heard and decided.

20 **14. Completion of Probation**

21 Upon written notice by the Board or its designee indicating successful completion of
22 probation, Respondent's license will be fully restored.

23 **15. Pharmacists Recovery Program**

24 By no later than ten 10 days after the effective date of this decision, Respondent shall have
25 completed all of the following if she has not already done so: contacted the Pharmacists Recovery
26 Program (PRP) for evaluation; enrolled in the PRP; completed, signed, and returned the treatment
27 contract as well as any addendums required or suggested by the PRP; successfully completed
28 registration for any drug or alcohol testing mandated by the treatment contract or by enrollment in

1 the PRP; and begun compliance with the drug or alcohol testing protocols. Respondent shall
2 successfully participate in the PRP and complete the treatment contract and any addendums
3 required or suggested by the PRP. The costs for PRP participation shall be borne by the
4 Respondent.

5 If Respondent is currently enrolled in the PRP, said participation is now mandatory and as
6 of the effective date of this decision is no longer considered a self-referral under Business and
7 Professions Code section 4362, subdivision (a)(2). Respondent shall successfully participate in
8 and complete her current contract and any subsequent addendums with the PRP.

9 Respondent shall pay administrative fees as invoiced by the PRP or its designee. Fees not
10 timely paid to the PRP shall constitute a violation of probation. The Board will collect unpaid
11 administrative fees as part of the annual probation monitoring costs if not submitted to the PRP.

12 Any of the following shall result in the automatic suspension of practice by Respondent and
13 shall be considered a violation of probation:

14 Failure to contact, complete enrollment, and execute and return the treatment contract with
15 the PRP, including any addendums, within 10 days of the effective date of the decision as
16 directed by the PRP;

17 Failure to complete registration for any drug or alcohol testing mandated by the treatment
18 contract or by the PRP, and begin compliance with the testing protocols, within 10 days of the
19 effective date of the decision as directed by the PRP;

20 Failure to comply with testing protocols regarding daily check-in or failure to complete a
21 mandated test as directed by the PRP;

22 Any report from the PRP of material non-compliance with the terms and conditions of the
23 treatment contract or any addendum; or

24 Termination by the PRP for non-compliance, failure to derive benefit, or as a public risk.

25 Respondent may not resume the practice of pharmacy until notified by the Board in writing.

26 Probation shall be automatically extended until Respondent successfully completes the
27 PRP. The Board will provide notice of any such suspension or extension of probation.

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1 During any suspension, Respondent shall not enter any pharmacy area or any portion of the
2 licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug
3 retailer, or any other distributor of drugs licensed by the Board, or any manufacturer, or any area
4 where dangerous drugs, dangerous devices, or controlled substances are maintained. Respondent
5 shall not practice as an Intern Pharmacist nor do any act involving drug selection, selection of
6 stock, manufacturing, compounding, dispensing, or patient consultation; nor shall Respondent
7 manage, administer, or be a consultant to any licensee of the Board, or have access to or control
8 the ordering, distributing, manufacturing, or dispensing of dangerous drugs, dangerous devices, or
9 controlled substances.

10 During any suspension, Respondent shall not engage in any activity that requires the
11 professional judgment of, or licensure as, an Intern Pharmacist. Respondent shall not direct or
12 control any aspect of the practice of pharmacy, or of the manufacturing, distributing, wholesaling,
13 or retailing of dangerous drugs, dangerous devices, or controlled substances.

14 Failure to comply with any requirement or deadline stated by this term shall be considered a
15 violation of probation.

16 **16. Drug and Alcohol Testing**

17 Respondent, at her own expense, shall participate in testing as directed by the Board or its
18 designee for the detection of alcohol, controlled substances, dangerous drugs, and dangerous
19 devices. Testing protocols may include biological fluid testing (urine, blood), breathalyzer, hair
20 follicle testing, or other testing protocols as directed by the Board or its designee. All testing
21 must be pursuant to an observed testing protocol, unless Respondent is informed otherwise in
22 writing by the Board or its designee. Respondent may be required to participate in testing for the
23 entire probation period and frequency of testing will be determined by the Board or its designee.

24 By no later than 30 days after the effective date of this decision, Respondent shall have
25 completed all of the following tasks: enrolled and registered with an approved drug and alcohol
26 testing vendor; provided that vendor with any documentation, and any information necessary for
27 payment by Respondent; commenced testing protocols, including all required contacts with the
28 testing vendor to determine testing dates; and begun testing. At all times, Respondent shall fully

1 cooperate with the testing vendor, and with the Board or its designee, with regard to enrollment,
2 registration, payment for, and compliance with, testing. Any failure to cooperate timely shall be
3 considered a violation of probation.

4 Respondent may be required to test on any day, including weekends and holidays.
5 Respondent is required to make daily contact with the testing vendor to determine if a test is
6 required, and if a test is required must submit to testing on the same day.

7 Prior to any vacation or other period of absence from the area where the approved testing
8 vendor provides services, Respondent shall seek and receive approval from the Board or its
9 designee to use an alternate testing vendor to ensure testing can occur. Upon approval,
10 Respondent shall enroll and register with the approved alternate drug testing vendor, provide to
11 that alternate vendor any documentation required by the vendor, including any necessary payment
12 by Respondent. During the period of absence of the area, Respondent shall commence testing
13 protocols with the alternate vendor, including required daily contacts with the testing vendor to
14 determine if testing is required, and required testing. Any failure to timely seek or receive
15 approval from the Board or its designee, or to timely enroll and register with, timely commence
16 testing protocols with, or timely undergo testing with, the alternate testing vendor, shall be
17 considered a violation of probation.

18 Upon detection of an illicit drug, controlled substance, or dangerous drug, the Board or its
19 designee may require Respondent to timely provide documentation from a licensed practitioner
20 authorized to prescribe the detected substance demonstrating that the substance was administered
21 or ingested pursuant to a legitimate prescription issued as a necessary part of treatment. All such
22 documentation shall be provided by Respondent within 10 days of being requested.

23 Any of the following shall be considered a violation of probation and shall result in
24 Respondent being immediately suspended from practice as an Intern Pharmacist until notified by
25 the Board in writing that she may resume practice: failure to timely complete all of the steps
26 required for enrollment and registration with the drug testing vendor, including making
27 arrangements for payment; failure to timely commence drug testing protocols; failure to contact
28 the drug testing vendor as required to determine testing dates; failure to test as required; failure to

1 timely supply documentation demonstrating that a detected substance was taken pursuant to a
2 legitimate prescription issued as a necessary part of treatment; and detection through testing of
3 alcohol, an illicit drug, controlled substance, or dangerous drug absent documentation that the
4 detected substance was taken pursuant to a legitimate prescription and a necessary treatment. In
5 the event of a suspension ordered after detection through testing of alcohol, an illicit drug, a
6 controlled substance, or a dangerous drug absent documentation that the detected substance was
7 taken pursuant to a legitimate prescription and a necessary treatment, the Board or its designee
8 shall inform Respondent of the suspension and inform her to immediately leave work, and shall
9 notify Respondent's employer and work site monitors of the suspension.

10 During any such suspension, Respondent shall not enter any pharmacy area or any portion
11 of the licensed premises of a wholesaler, third-party-logistics provider, veterinary food-animal
12 drug retailer, or any other distributor of drugs licensed by the Board, or any manufacturer, or any
13 area where dangerous drugs, dangerous devices, or controlled substances are maintained.
14 Respondent shall not practice pharmacy nor do any act involving drug selection, selection of
15 stock, manufacturing, compounding, dispensing, or patient consultation; nor shall Respondent
16 manage, administer, or be a consultant to any licensee of the Board, or have access to or control
17 the ordering, distributing, manufacturing, or dispensing of dangerous drugs, dangerous devices,
18 and controlled substances.

19 During any such suspension, Respondent shall not engage in any activity that requires the
20 professional judgment of, or licensure as, an Intern Pharmacist. Respondent shall not direct or
21 control any aspect of the practice of pharmacy, or of the manufacturing, distributing, wholesaling,
22 or retailing of dangerous drugs or dangerous devices.

23 Failure to comply with any such suspension shall be considered a violation of probation.
24 Failure to comply with any requirement or deadline stated by this term shall be considered a
25 violation of probation.

26 **17. Notification of Departure**

27 Prior to leaving the probationary geographic area designated by the Board or its designee
28 for a period greater than twenty-four hours, Respondent shall notify the Board verbally and in

1 writing of the dates of departure and return. Failure to comply with this provision shall be
2 considered a violation of probation.

3 **18. Abstain from Drugs and Alcohol**

4 Respondent shall completely abstain from the possession or use of alcohol, controlled
5 substances, illicit drugs, dangerous drugs, dangerous devices, and their associated paraphernalia,
6 except when possessed or used pursuant to a legitimate prescription issued as a necessary part of
7 treatment. Respondent shall ensure that she is not in the same physical location as individuals
8 who are using illicit substances even if Respondent is not personally ingesting the drugs. Any
9 possession or use of alcohol, dangerous drugs, dangerous devices, controlled substances, or their
10 associated paraphernalia for which a legitimate prescription has not been issued as a necessary
11 part of treatment, or any physical proximity to persons using illicit substances, shall be considered
12 a violation of probation.

13 **19. Prescription Coordination and Monitoring of Prescription Use**

14 Within 30 days of the effective date of this decision, Respondent shall submit to the Board,
15 for its prior approval, the name and qualifications of a single physician, nurse practitioner,
16 physician assistant, or psychiatrist of Respondent's choice, who shall be aware of the
17 Respondent's history with the use of controlled substances, and who will coordinate and monitor
18 any prescriptions for Respondent for dangerous drugs, dangerous devices, controlled substances,
19 or mood-altering drugs. The approved practitioner shall be provided with a copy of the Board's
20 Accusation and decision. A record of this notification must be provided to the Board or its
21 designee upon request. Respondent shall sign a release authorizing the practitioner to
22 communicate with the Board or its designee about Respondent's treatment. The coordinating
23 physician, nurse practitioner, physician assistant, or psychiatrist shall report to the Board on a
24 quarterly basis for the duration of probation regarding Respondent's compliance with this
25 condition. If any substances considered addictive have been prescribed, the report shall identify a
26 program for the time-limited use of any such substances. The Board or its designee may require
27 that the single coordinating physician, nurse practitioner, physician assistant, or psychiatrist be a
28 specialist in addictive medicine, or consult a specialist in addictive medicine. Should

1 Respondent, for any reason, cease supervision by the approved practitioner, Respondent shall
2 notify the Board or its designee immediately and, within 30 days of ceasing supervision, submit
3 the name of a replacement physician, nurse practitioner, physician assistant, or psychiatrist of
4 Respondent's choice to the Board or its designee for its prior approval. Failure to timely submit
5 the selected practitioner or replacement practitioner to the Board or its designee for approval, or
6 to ensure the required quarterly reporting thereby, shall be considered a violation of probation.

7 If at any time an approved practitioner determines that Respondent is unable to practice
8 safely or independently as an Intern Pharmacist, the practitioner shall notify the Board or its
9 designee immediately by telephone and follow up by written letter within three working days.
10 Upon notification from the Board or its designee of this determination, Respondent shall be
11 automatically suspended and shall not resume practice as an Intern Pharmacist until notified by
12 the Board or its designee that practice may be resumed.

13 During any suspension, Respondent shall not enter any pharmacy area or any portion of the
14 licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug
15 retailer, or any other distributor of drugs licensed by the Board, or any manufacturer, or any area
16 where dangerous drugs, dangerous devices, or controlled substances are maintained. Respondent
17 shall not practice pharmacy nor do any act involving drug selection, selection of stock,
18 manufacturing, compounding, dispensing, or patient consultation; nor shall Respondent manage,
19 administer, or be a consultant to any licensee of the Board, or have access to or control the
20 ordering, distributing, manufacturing, or dispensing of dangerous drugs, dangerous devices, and
21 controlled substances. Respondent shall not resume practice until notified by the Board.

22 During any suspension, Respondent shall not engage in any activity that requires the
23 professional judgment of, or licensure as an Intern Pharmacist. Respondent shall not direct or
24 control any aspect of the practice of pharmacy or of the manufacturing, distributing, wholesaling,
25 or retailing of dangerous drugs, dangerous devices, or controlled substances.

26 Failure to comply with any requirement or deadline stated by this term shall be considered a
27 violation of probation.

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1 **20. Facilitated Group Recovery and/or Support Meetings**

2 Within 30 days of the effective date of this decision, Respondent shall begin regular
3 attendance at a group recovery or support meeting that is run by a trained facilitator approved in
4 advance by the Board or its designee. The required frequency of group meeting attendance shall
5 be determined by the Board or its designee. Respondent shall continue regular attendance as
6 directed at an approved facilitated group meeting until the Board or its designee advises the
7 Respondent in writing that she may cease regular attendance. Respondent shall provide signed
8 and dated documentation of attendance as required with each quarterly report. Failure to attend as
9 required or to submit documentation of attendance shall be considered a violation of probation.

10 If Respondent is required to participate in the PRP, compliance with this term can be
11 demonstrated through that program. Where Respondent is enrolled in the PRP, participation as
12 required in a facilitated group meeting approved by the PRP shall be sufficient for satisfaction of
13 this requirement. Any deviation from participation requirements for the PRP-approved group
14 shall be considered a violation of probation.

15 **21. Attend Substance Abuse Recovery Relapse Prevention and Support Groups**

16 Within 30 days of the effective date of this decision, Respondent shall begin regular
17 attendance at a recognized and established substance abuse recovery support group in California
18 (e.g., Alcoholics Anonymous, Narcotics Anonymous, etc.), which has been approved by the
19 Board or its designee. Respondent must attend the number of group meetings per week or month
20 directed by the Board or its designee, which shall typically be at least one per week. Respondent
21 shall continue regular attendance and submit signed and dated documentation confirming
22 attendance with each quarterly report for the duration of probation. Failure to attend or submit
23 documentation thereof shall be considered a violation of probation.

24 Where Respondent is enrolled in the PRP, participation as required in a recovery group
25 meeting approved by the PRP shall be sufficient for satisfaction of this requirement. Any
26 deviation from participation requirements for the PRP-approved group shall be considered a
27 violation of probation.

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1 **22. Work Site Monitor**

2 It is a condition of Respondent’s enrollment in the Pharmacists Recovery Program (PRP)
3 that she is required to have a work site monitor approved by the PRP who shall be responsible for
4 supervising Respondent during working hours. Respondent shall be responsible for ensuring that
5 the work site monitor reports in writing to the PRP monthly or on another schedule as directed by
6 the PRP. Should the designated work site monitor suspect at any time during the probationary
7 period that Respondent has abused alcohol or drugs, he or she shall notify the PRP immediately.
8 The initial notification shall be made orally within one business day of the occurrence, which
9 shall be followed by written notification within two business days of the occurrence. If, for any
10 reason, including change of employment, Respondent is no longer able to be monitored by the
11 approved work site monitor, within 10 days of commencing new employment for prior approval
12 by the PRP. Failure to identify an acceptable initial or replacement work site monitor, or to ensure
13 monthly reports are submitted to the PRP by the work site monitor, shall be considered a violation
14 of probation.

15 Within 30 days of being approved by the PRP, the work site monitor shall sign an
16 affirmation that he or she has reviewed the terms and conditions of Respondent’s disciplinary
17 order and agrees to monitor Respondent. The work site monitor shall at least:

- 18 1) Have regular face-to-face contact with Respondent in the work environment, at least
19 once per week or with greater frequency if required by the Board or its designee;
20 2) Interview other staff in the office regarding Respondent’s behavior, if applicable; and
21 3) Review Respondent’s work attendance.

22 The written reports submitted to the PRP by the work site monitor shall include at least the
23 following information: Respondent’s name and license number; the monitor’s name, license
24 number (if applicable) and work site location; the dates the monitor had face-to-face contact with
25 Respondent; the staff interviewed, if applicable; an attendance report; notes on any changes in
26 Respondent’s behavior or personal habits; notes on any indicators that may lead to substance
27 abuse; and the work site monitor’s signature.

28 ///

1 Respondent shall complete the required consent forms and sign an agreement with the work
2 site monitor and the Board to allow the Board to communicate with the work site monitor.

3 **23. Ethics Course**

4 Respondent shall enroll in a course in ethics at Respondent's expense and approved in
5 advance by the Board or its designee that complies with Title 16 California Code of Regulations
6 section 1773.5. Respondent shall provide proof of enrollment upon request. Within five days of
7 completion, Respondent shall submit a copy of the certificate of completion to the Board or its
8 designee. Failure to timely enroll in an approved ethics course, to successfully complete it before
9 the end of the fourth year of probation, or to timely submit proof of completion to the Board or its
10 designee, shall be considered a violation of probation.

11 **24. Supervised Practice**

12 Within 30 days of the effective date of this decision, Respondent shall submit to the Board
13 or its designee, for prior approval, the name of a Pharmacist licensed by and not on probation
14 with the Board, to serve as Respondent's practice supervisor. As part of the documentation
15 submitted, Respondent shall cause the proposed practice supervisor to report to the Board in
16 writing acknowledging that he or she has read the decision in Case Number 6947, and is familiar
17 with the terms and conditions imposed thereby, including the level of supervision required by the
18 Board or its designee. This level will be determined by the Board or its designee, will be
19 communicated to the Respondent on or before the effective date of this decision and shall be one
20 of the following:

21 Continuous – At least 75% of a work week

22 Substantial - At least 50% of a work week

23 Partial - At least 25% of a work week

24 Daily Review - Supervisor's review of probationer's daily activities within 24 hours

25 Respondent may practice only under the required level of supervision by an approved
26 practice supervisor. If, for any reason, including change of employment, Respondent is no longer
27 supervised at the required level by an approved practice supervisor, within 10 days of this change
28 in supervision Respondent shall submit to the Board or its designee, for prior approval, the name

1 of a Pharmacist licensed by and not on probation with the Board, to serve as Respondent's
2 replacement practice supervisor. As part of the documentation submitted, Respondent shall cause
3 the proposed replacement practice supervisor to report to the Board in writing acknowledging that
4 he or she has read the decision in Case Number 6947, and is familiar with the terms and
5 conditions imposed thereby, including the level of supervision required.

6 Any of the following shall result in the automatic suspension of practice by a Respondent
7 and shall be considered a violation of probation:

8 Failure to nominate an initial practice supervisor, and to have that practice supervisor report
9 to the Board in writing acknowledging the decision, terms and conditions, and supervision level,
10 within 30 days;

11 Failure to nominate a replacement practice supervisor, and to have that practice supervisor
12 report to the Board in writing acknowledging the decision, terms and conditions, and supervision
13 level, within 10 days;

14 Practicing in the absence of an approved practice supervisor beyond the initial or
15 replacement nomination period; or

16 Any failure to adhere to the required level of supervision.

17 Respondent shall not resume practice until notified in writing by the Board or its designee.

18 During any suspension, Respondent shall not enter any pharmacy area or any portion of the
19 licensed premises of a wholesaler, third-party logistics provider, veterinary food-animal drug
20 retailer, or any other distributor of drugs licensed by the Board, or any manufacturer, or any area
21 where dangerous drugs, dangerous devices, or controlled substances are maintained. Respondent
22 shall not practice pharmacy nor do any act involving drug selection, selection of stock,
23 manufacturing, compounding, dispensing, or patient consultation; nor shall Respondent manage,
24 administer, or be a consultant to any licensee of the Board, or have access to or control the
25 ordering, distributing, manufacturing, or dispensing of dangerous drugs, dangerous devices, or
26 controlled substances.

27 During any suspension, Respondent shall not engage in any activity that requires the
28 professional judgment of, or licensure as an Intern Pharmacist. Respondent shall not direct or

1 control any aspect of the practice of pharmacy or of the manufacture, distribution, wholesaling, or
2 retailing of dangerous drugs, dangerous devices, or controlled substances.

3 Failure to comply with any suspension shall be considered a violation of probation.

4 **25. No Ownership or Management of Licensed Premises**

5 Respondent shall not own, have any legal or beneficial interest in, nor serve as a manager,
6 administrator, member, officer, director, trustee, associate, or partner of any business, firm,
7 partnership, or corporation currently or hereinafter licensed by the Board. Respondent shall sell
8 or transfer any legal or beneficial interest in any entity licensed by the Board within 90 days
9 following the effective date of this decision and shall immediately thereafter provide written
10 proof thereof to the Board. Failure to timely divest any legal or beneficial interest or provide
11 documentation thereof shall be considered a violation of probation.

12 **ACCEPTANCE**

13 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
14 stipulation and the effect it will have on my Intern Pharmacist Registration. I enter into this
15 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
16 to be bound by the Decision and Order of the Board of Pharmacy.

17
18 DATED: _____

19 NATALYA IGNATYEVA
20 *Respondent*
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1 control any aspect of the practice of pharmacy or of the manufacture, distribution, wholesaling, or
2 retailing of dangerous drugs, dangerous devices, or controlled substances.

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7 partnership, or corporation currently or hereinafter licensed by the Board. Respondent shall sell
8 or transfer any legal or beneficial interest in any entity licensed by the Board within 90 days
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14 stipulation and the effect it will have on my Intern Pharmacist Registration. I enter into this
15 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
16 to be bound by the Decision and Order of the Board of Pharmacy.

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18 DATED: 10/23/2020


19 NATALYA IGNATYEVA
20 Respondent
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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Pharmacy.

DATED: _____

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
THEODORE S. DRCAR
Supervising Deputy Attorney General

DANIEL J. CROSS
Deputy Attorney General
Attorneys for Complainant

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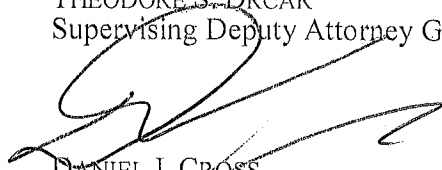
ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Pharmacy.

DATED: 11/10/20

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
THEODORE S. DRGAR
Supervising Deputy Attorney General



DANIEL J. CROSS
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation Number 6947

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Attorney General of California
2 THEODORE S. DRCAR
Supervising Deputy Attorney General
3 DANIEL J. CROSS
Deputy Attorney General
4 State Bar No. 203017
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9058
7 Facsimile: (619) 645-2061
Attorneys for Complainant
8

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

13 In the Matter of the Accusation Against:

14 **NATALYA IGNATYEVA**
15 **9475 Maler Road**
San Diego, CA 92129

16 **Intern Pharmacist Registration No. INT**
17 **39269**

18 Respondent.

Case No. 6947

OAH No. 2020080195

ACCUSATION

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 October 17, 2016, the Board of Pharmacy issued Intern Pharmacist
23 Registration Number INT 39269 to Natalya Ignatyeva (Respondent). The Intern Pharmacist
24 Registration was in full force and effect at all times relevant to the charges brought herein and
25 will expire on May 31, 2021, unless renewed. On August 10, 2020, pursuant to the Stipulated
26 Order for Interim Suspension of License Pursuant to Business and Professions Code Section 494,
27 Respondent's license was suspended.

28 ///

1 **JURISDICTION**

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

5 4. Code sections 118 and 4300.1 provide that the suspension, expiration, forfeiture,
6 cancellation or surrender of a license will not deprive the Board of jurisdiction to institute or
7 continue a disciplinary proceeding against a licensee.

8 **STATUTORY AUTHORITY**

9 5. Section 4300 of the Code states:

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

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

13 (1) Suspending judgment.

14 (2) Placing him or her upon probation.

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

16 (4) Revoking his or her license.

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

19 (c) The board may refuse a license to any applicant guilty of unprofessional
20 conduct. The board may, in its sole discretion, issue a probationary license to any
21 applicant for a license who is guilty of unprofessional conduct and who has met all
other requirements for licensure. The board may issue the license subject to any
terms or conditions not contrary to public policy, including, but not limited to, the
following:

22 (1) Medical or psychiatric evaluation.

23 (2) Continuing medical or psychiatric treatment.

24 (3) Restriction of type or circumstances of practice.

25 (4) Continuing participation in a board-approved rehabilitation program.

26 (5) Abstention from the use of alcohol or drugs.

27 (6) Random fluid testing for alcohol or drugs.

28 (7) Compliance with laws and regulations governing the practice of pharmacy.

1 (d) The board may initiate disciplinary proceedings to revoke or suspend any
2 probationary certificate of licensure for any violation of the terms and conditions of
probation. Upon satisfactory completion of probation, the board shall convert the
probationary certificate to a regular certificate, free of conditions.

3 (e) The proceedings under this article shall be conducted in accordance with
4 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the
5 Government Code, and the board shall have all the powers granted therein. The
action shall be final, except that the propriety of the action is subject to review by the
superior court pursuant to Section 1094.5 of the Code of Civil Procedure.

6 6. Section 4301 of the Code states:

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

9 ...

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

12 ...

13 (h) The administering to oneself, of any controlled substance, or the use of any
14 dangerous drug or of alcoholic beverages to the extent or in a manner as to be
dangerous or injurious to oneself, to a person holding a license under this chapter, or
15 to any other person or to the public, or to the extent that the use impairs the ability of
the person to conduct with safety to the public the practice authorized by the license.

16 ...

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

19 ...

20 **HEALTH AND SAFETY CODE**

21 7. California Health and Safety Code section 11170 states, "No person shall prescribe,
22 administer, or furnish a controlled substance for himself."

23 **COST RECOVERY**

24 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
25 administrative law judge to direct a licensee found to have committed a violation or violations of
26 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
27 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
28

1 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
2 included in a stipulated settlement.

3 DEFINITIONS

4 9. Lorazepam is a Schedule IV controlled substance pursuant to Health and Safety Code
5 section 11057, subdivision (d)(16), and a dangerous drug pursuant to Business and Professions
6 Code section 4022.

7 10. Tramadol is a Schedule IV controlled substance pursuant to Controlled Substances
8 Act.

9 11. Pyxis is an automated medication dispensing system supporting decentralized
10 medication management. It helps clinicians safely and efficiently dispense the right medications,
11 for the right patients at the right time.

12 FACTUAL ALLEGATIONS

13 12. On or about October 7, 2019, pharmacy staff at Scripps Memorial Hospital Encinitas
14 (SMHE) could not account for the removal of two tramadol pills from the Pyxis machine on the
15 Medical-Surgical Unit. The facility initiated an investigation. A review of the tramadol records
16 found no explanation to account for the missing tramadol. The Pyxis Activity report identified
17 that the log in code for Pharmacist OH was used to access the missing tramadol. Pharmacist in
18 Charge (PIC) EC and Registered Nurse MH interviewed OH. OH stated that Respondent
19 shadowed him on the day in question and asked thoughtful questions about the process.
20 Respondent was with OH when he accessed the Pyxis machine to obtain lorazepam for
21 administration to a patient having seizures located approximately three rooms from the
22 medication room. OH could not recall if he fully logged out of the Pyxis when he left the
23 medication room during this rapid response code. The medication room contained working
24 surveillance videos covering the hallway of the medication room where the Pyxis was located.

25 13. Surveillance recordings showed OH and Respondent enter the medication room using
26 OH's passcode. Shortly after, OH hurriedly left the room. The video showed Respondent
27 followed OH toward the exit but stopped at the door. Respondent went back inside the
28 medication room, peeked out the door twice before leaving the room, and headed towards the

1 patient room where OH was administering the lorazepam. Video surveillance showed that no
2 other staff entered or exited the room during this period. PIC EC and RN MH interviewed
3 Respondent about the missing tramadol. Respondent denied stealing the tramadol and stated that
4 she did not know how to access patient medications in the Pyxis machine.

5 14. On or about December 19, 2019, Board Investigator TS interviewed OH. OH
6 recalled that Respondent asked many questions including how a pharmacist accounted for
7 medications administered during a code and whether there are cameras in this unit.

8 15. On or about January 23, 2020, Board Investigator TS interviewed Respondent and
9 Respondent admitted that she took the two tramadol pills that went missing from the Medical
10 Surgical Unit Pyxis on October 7, 2019.

11 16. Board Investigator TS also asked Respondent about the two narcotic drips that went
12 missing from Scripps Encinitas Medical Surgical Unit Pyxis on or about September 10, 2019.
13 Respondent initially denied taking the drugs while working at SMHE. When asked why she was
14 terminated from employment, Respondent stated that she was “accused of accessing the Pyxis.”
15 Later during this interview, Respondent admitted that she accessed and removed narcotics from
16 the narcotic drip pocket from the Pyxis machine located at UCSD Medical Center Pharmacy
17 (UCSD) and consumed this controlled substance medication orally.

18 **FIRST CAUSE FOR DISCIPLINE**

19 **(Unprofessional Conduct)**

20 17. Respondent is subject to discipline under section 4301 for general unprofessional
21 conduct in that she stole narcotics from her employer as further described in paragraphs 12-16,
22 above, and incorporated herein.

23 **SECOND CAUSE FOR DISCIPLINE**

24 **(Acts Involving Moral Turpitude, Dishonesty or Fraud)**

25 18. Respondent is subject to discipline under Code section 4301 subdivision (f) for
26 committing an act or acts involving moral turpitude, dishonesty, fraud, deceit, or corruption, as
27 described in paragraphs 12-16, above, and incorporated herein.

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THIRD CAUSE FOR DISCIPLINE

(Self-Administration of Controlled Substance)

19. Respondent is subject to disciplinary action under Code section 4301, subdivision (h), for engaging in unprofessional conduct in that she administered a controlled substance to herself in a manner as to be dangerous to herself or the public as described with more particularity in paragraphs 12-16, above.

FOURTH CAUSE FOR DISCIPLINE

(Possession of a Controlled Substance)

20. Respondent is subject to discipline under Code sections 4301 subdivision (j), for possession of a controlled substance or substances without a prescription, as described above.

FIFTH CAUSE FOR DISCIPLINE

(Furnishing a Dangerous Drug/Controlled Substance)

21. Respondent is subject to discipline under Code sections 4301 subdivision (j), and/or Health and Safety Code section 11170, in that Respondent furnished to herself or another without a valid prescription, and/or conspired to furnish, and/or assisted or abetted furnishing of, a dangerous drug and/or a controlled substance, as described in paragraphs 12-16, above, and herein incorporated.

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 Intern Pharmacist Registration Number INT 39269, issued to Natalya Ignatyeva;

2. Ordering Natalya Ignatyeva 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,

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

DATED: 8/28/2020

Anne Sodergren

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

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