

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

**In the Matter of the Accusation Against:**

**GOLDEN STATE SPECIALTY PHARMACY, INC.  
MARIA SARKISIAN, CEO/PIC  
ARMEN APOYAN, OWNER**

**Pharmacy Permit No. PHY 54580,**

**and**

**MARIA SARKISIAN  
Pharmacist License No. RPH 42868**

**Respondents.**

**Accusation Case No. 7453**

**and**

**In the Matter of the Statement of Issues Against:**

**GOLDEN STATE SPECIALITY PHARMACY, INC.**

**Respondent.**

## Statement of Issues Case No. 7355

**OAH No. 2023080671**

### DECISION AND ORDER

The attached Stipulated Surrender of Pharmacy Permit and 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 May 3, 2024.

It is so ORDERED on April 3, 2024.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

By

A handwritten signature in black ink, appearing to read "Seung W. Oh", is written over a light blue rectangular background.

Seung W. Oh, Pharm.D.  
Board President

1 ROB BONTA  
Attorney General of California  
2 SHAWN P. COOK  
Supervising Deputy Attorney General  
3 MATTHEW S. BEASLEY  
Deputy Attorney General  
4 State Bar No. 288070  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6705  
6 Facsimile: (916) 731-2126  
E-mail: Matthew.Beasley@doj.ca.gov  
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

13 **GOLDEN STATE SPECIALTY**  
**PHARMACY, INC.**  
14 **MARIA SARKISIAN, CEO/PIC**  
**ARMEN APOYAN, OWNER**  
15 **325 N. Victory Blvd.**  
**Burbank, CA 91502**

16 **Pharmacy Permit No. PHY 54580,**

17 **and**

18 **MARIA SARKISIAN**  
19 **17055 Oak View Drive**  
**Encino, CA 91436**

20 **Pharmacist License No. RPH 42868**

21 Respondents.

22 In the Matter of the Statement of Issues  
23 Against:

24 **GOLDEN STATE SPECIALTY**  
**PHARMACY, INC.**

25 **Community Pharmacy License Application**

26 Respondent.

Accusation Case No. 7453

Statement of Issues Case No. 7355

OAH No. 2023080671

**STIPULATED SURRENDER OF**  
**PHARMACY PERMIT AND ORDER**

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

3 **PARTIES**

4 1. Anne Sodergren (Complainant) is the Executive Officer of the Board of Pharmacy  
5 (Board). She brought this action solely in her official capacity and is represented in this matter by  
6 Rob Bonta, Attorney General of the State of California, by Matthew S. Beasley, Deputy Attorney  
7 General.

8 2. Golden State Specialty Pharmacy, Inc. (GSSP) is represented in this proceeding by  
9 attorney Paul L. Cass, whose address is: 7777 Greenback Lane, Suite 107 Citrus Heights, CA  
10 95610.

11 3. On or about March 10, 2017, the Board issued Pharmacy Permit No. PHY 54580 to  
12 GSSP. The Pharmacy Permit was in full force and effect at all times relevant to the charges  
13 brought in Accusation No. 7453, and expired on March 1, 2023 and has not been renewed.  
14 Pursuant to Business and Professions Code section 4300.1, the expiration of a board-issued  
15 license shall not deprive the board of jurisdiction to commence or proceed with any investigation  
16 of, or action or disciplinary proceeding against, the licensee or to render a decision suspending or  
17 revoking the license.

18 **JURISDICTION**

19 4. Accusation No. 7453 and Statement of Issues No. 7355 was filed before the Board.  
20 The Accusation and Statement of Issues and all other statutorily required documents were  
21 properly served on GSSP on June 5, 2023. The operative First Amended Accusation and First  
22 Amended Statement of Issues, which is currently pending against Respondent, was properly  
23 served on Respondent on January 25, 2024. Respondent timely filed its Notice of Defense  
24 contesting the Accusation and Statement of Issues. A copy of First Amended Accusation No.  
25 7453 and Statement of Issues No. 7355 is attached as Exhibit A and incorporated by reference.

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11. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

12. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

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

## ORDER

IT IS HEREBY ORDERED that Pharmacy Permit No. PHY 54580, issued to Respondent Golden State Specialty Pharmacy, Inc., is surrendered and accepted by the Board.

IT IS HEREBY ORDERED that First Amended Statement of Issues No. 7355 is affirmed, and that the Community Pharmacy License Application dated December 9, 2021 of Respondent Golden State Specialty Pharmacy, Inc. is denied.

1. The surrender of Respondent's Pharmacy Permit and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board. Respondent Golden State Specialty Pharmacy understands and acknowledges that for purposes of Business and Professions Code section 4307, this stipulated surrender is the same as a revocation.

2. Respondent shall lose all rights and privileges as a Pharmacy in California as of the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board its pocket license and, if one was issued, its wall certificate on or before the effective date of the Decision and Order.

1           4.     If Respondent ever applies for licensure or petitions for reinstatement in the State of  
2 California, the Board shall treat it as a new application for licensure. Respondent must comply  
3 with all the laws, regulations and procedures for licensure in effect at the time the application or  
4 petition is filed, and all of the charges and allegations contained in Accusation No. 7453 shall be  
5 deemed to be true, correct and admitted by Respondent when the Board determines whether to  
6 grant or deny the application or petition.

7           5.     If Respondent should ever apply or reapply for a new license or certification, or  
8 petition for reinstatement of a license, by any other health care licensing agency in the State of  
9 California, all of the charges and allegations contained in First Amended Accusation No. 7453  
10 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement  
11 of Issues or any other proceeding seeking to deny or restrict licensure.

12          6.     Respondent Golden State Specialty Pharmacy, Inc. may not apply, reapply, or  
13 petition for any licensure, permit, or registration from the Board for three (3) years from the  
14 effective date of the Decision and Order.

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**ACCEPTANCE**

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney Paul L. Cass. I understand the stipulation and the effect it will have on my Pharmacy Permit. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Pharmacy.

DATED: \_\_\_\_\_  
GOLDEN STATE SPECIALTY  
PHARMACY, INC.  
By: Maria Sarkisian, CEO  
*Respondent*

I have read and fully discussed with Maria Sarkisian the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: \_\_\_\_\_  
PAUL L. CASS  
*Attorney for Respondent*

**ENDORSEMENT**

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

DATED: \_\_\_\_\_  
Respectfully submitted,  
ROB BONTA  
Attorney General of California  
SHAWN P. COOK  
Supervising Deputy Attorney General  
  
MATTHEW S. BEASLEY  
Deputy Attorney General  
*Attorneys for Complainant*



1 ACCEPTANCE

2 I have carefully read the above Stipulated Surrender of License and Order and have fully  
3 discussed it with my attorney Paul L. Cass. I understand the stipulation and the effect it will have  
4 on my Pharmacy Permit. I enter into this Stipulated Surrender of License and Order voluntarily,  
5 knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of  
6 Pharmacy.

7  
8 DATED: 02/25/2024

*maria sarkisian*

GOLDEN STATE SPECIALTY  
PHARMACY, INC.

By: Maria Sarkisian, CEO  
Respondent

11 I have read and fully discussed with Maria Sarkisian the terms and conditions and other  
12 matters contained in this Stipulated Surrender of License and Order. I approve its form and  
13 content.

14 DATED: 2/26/24

*Paul L. Cass*

PAUL L. CASS  
Attorney for Respondent

17 ENDORSEMENT

18 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
19 for consideration by the Board of Pharmacy of the Department of Consumer Affairs.

20 DATED: 2/26/24

Respectfully submitted,

21  
22 ROB BONTA  
Attorney General of California  
23 SHAWN P. COOK  
Supervising Deputy Attorney General

*Matthew S. Beasley*

24  
25 MATTHEW S. BEASLEY  
26 Deputy Attorney General  
27 Attorneys for Complainant  
28

## **Exhibit A**

**First Amended Accusation No. 7453 and First Amended Statement of Issues No. 7355**

1 ROB BONTA  
Attorney General of California  
2 SHAWN P. COOK  
Supervising Deputy Attorney General  
3 MATTHEW S. BEASLEY  
Deputy Attorney General  
4 State Bar No. 288070  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6705  
6 Facsimile: (916) 731-2126  
E-mail: Matthew.Beasley@doj.ca.gov  
7 *Attorneys for Complainant*

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

12 In the Matter of the Accusation Against:

Accusation Case No. 7453

13 **GOLDEN STATE SPECIALTY**  
14 **PHARMACY, INC.**  
15 **MARIA SARKISIAN, CEO/PIC**  
16 **ARMEN APOYAN, OWNER**  
**325 N. Victory Blvd.**  
**Burbank, CA 91502**

**FIRST AMENDED ACCUSATION**

17 **Pharmacy Permit No. PHY 54580,**

18 **and**

19 **MARIA SARKISIAN**  
20 **17055 Oak View Drive**  
**Encino, CA 91436**

21 **Pharmacist License No. RPH 42868**

22 Respondents.

23 In the Matter of the Statement of Issues  
Against:

Case No. 7355

24 **GOLDEN STATE SPECIALTY**  
25 **PHARMACY, INC.**

**FIRST AMENDED STATEMENT OF  
ISSUES**

26 **Community Pharmacy License Application**

27 Respondent.

1 **PARTIES**

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

5 2. On or about March 10, 2017, the Board of Pharmacy (Board) issued Pharmacy Permit  
6 Number PHY 54580 to Respondent Golden State Specialty Pharmacy, Inc. (Golden State).  
7 Respondent Maria Sarkisian (Sarkisian) has been the majority owner, president, and pharmacist-  
8 in-charge of Golden State since March 10, 2017. Respondent Armen Apoyan (Apoyan) was the  
9 minority owner of Golden State since March 10, 2017. Golden State, Sarkisian, and Apoyan, are  
10 referred to hereinafter, collectively, as "Respondents." The Pharmacy Permit was in full force  
11 and effect at all times relevant to the charges brought herein, but expired on March 1, 2023 and  
12 has not yet been renewed.

13 3. On or about August 30, 1989, the Board issued Pharmacist License Number RPH  
14 42868 to Sarkisian. The Pharmacist License was in full force and effect at all times relevant to  
15 the charges brought herein, and will expire on January 31, 2025, unless and renewed.

16 **JURISDICTION**

17 4. This Accusation is brought before the Board, under the authority of the following  
18 laws. All section references are to the Business and Professions Code (Code) unless otherwise  
19 indicated.

20 5. Section 4300 of the Code states, in pertinent part:

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

22 ...

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

(1) Medical or psychiatric evaluation.

(2) Continuing medical or psychiatric treatment.

(3) Restriction of type or circumstances of practice.

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

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

(6) Random fluid testing for alcohol or drugs.

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

...

(e) The proceedings under this article shall be conducted in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the 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. Section 4300.1 of the Code states:

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

7. Section 4307, subdivision (a), of the Code states:

Any person who has been denied a license or whose license has been revoked or is under suspension, or who has failed to renew his or her license while it was under suspension, or who has been a manager, administrator, owner, member, officer, director, associate, partner, or any other person with management or control of any partnership, corporation, trust, firm, or association whose application for a license has been denied or revoked, is under suspension or has been placed on probation, and while acting as the manager, administrator, owner, member, officer, director, associate, partner, or any other person with management or control had knowledge of or knowingly participated in any conduct for which the license was denied, revoked, suspended, or placed on probation, shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, partner, or in any other position with management or control of a licensee as follows:

(1) Where a probationary license is issued or where an existing license is placed on probation, this prohibition shall remain in effect for a period not to exceed five years.

(2) Where the license is denied or revoked, the prohibition shall continue until the license is issued or reinstated.

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## STATUTORY PROVISIONS

8. Section 4037, subdivision (a), of the Code states:

“Pharmacy” means an area, place, or premises licensed by the board in which the profession of pharmacy is practiced and where prescriptions are compounded. “Pharmacy” includes, but is not limited to, any area, place, or premises described in a license issued by the board wherein controlled substances, dangerous drugs, or dangerous devices are stored, possessed, prepared, manufactured, derived, compounded, or repackaged, and from which the controlled substances, dangerous drugs, or dangerous devices are furnished, sold, or dispensed at retail.

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

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

(a) Procurement of a license by fraud or misrepresentation.

...

(f) The commission of any act involving moral turpitude, dishonesty, fraud, 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.

(g) Knowingly making or signing any certificate or other document that falsely represents the existence or nonexistence of a state of facts.

...

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

...

10. Section 4105, subdivision (a), of the Code states: “All records or other documentation of the acquisition and disposition of dangerous drugs and dangerous devices by any entity licensed by the board shall be retained on the licensed premises in a readily retrievable form.”

11. Section 4113, subdivision (c), of the Code states: “The pharmacist-in-charge shall be responsible for a pharmacy’s compliance with all state and federal laws and regulations pertaining to the practice of pharmacy.”

12. Section 4169, subdivision (a), of the Code states, in pertinent part: “A person or entity shall not do any of the following: (1) Purchase, trade, sell, warehouse, distribute, or transfer

1 dangerous drugs or dangerous devices at wholesale with a person or entity that is not licensed  
2 with the board as a wholesaler, third-party logistics provider, or pharmacy....”

3 13. Section 4201, subdivision (j), of the Code provides that, with respect to a pharmacy  
4 license, “any change in the proposed beneficial ownership interest shall be reported to the board  
5 within 30 days thereafter upon a form to be furnished by the board.”

6 14. Section 4302 of the Code states: “The board may deny, suspend, or revoke any  
7 license where conditions exist in relation to any person holding 10 percent or more of the  
8 ownership interest or where conditions exist in relation to any officer, director, or other person  
9 with management or control of the license that would constitute grounds for disciplinary action  
10 against a licensee.”

11 15. Section 4306.5 of the Code states, in pertinent part:

12 Unprofessional conduct for a pharmacist may include any of the following:

13 (a) Acts or omissions that involve, in whole or in part, the inappropriate  
14 exercise of his or her education, training, or experience as a pharmacist, whether or  
15 not the act or omission arises in the course of the practice of pharmacy or the  
16 ownership, management, administration, or operation of a pharmacy or other entity  
17 licensed by the board.

18 ...

19 16. Section 4312 of the Code states, in pertinent part:

20 (a) The board may cancel the license of a facility that is licensed by the board if  
21 the licensed premises remain closed, as defined in subdivision (e), other than by order  
22 of the board.

23 ...

24 (e) For the purposes of this section, “closed” means not engaged in the ordinary  
25 activity for which a license has been issued for at least one day each calendar week  
26 during any 120-day period.

27 ...

28 17. Section 4333, subdivision (a), of the Code states: “All prescriptions filled by a  
pharmacy and all other records required by Section 4081 shall be maintained on the  
premises and available for inspection by authorized officers of the law for a period of at

1 least three years. In cases where the pharmacy discontinues business, these records shall be  
2 maintained in a board-licensed facility for at least three years.”

### 3 **REGULATORY PROVISIONS**

4 18. Title 16, California Code of Regulations section 1709, subdivision (b), states:

5 (1) Any transfer, in a single transaction or in a series of transactions, of 10  
6 percent or more of the beneficial interest in a business entity licensed by the board to  
7 a person or entity who did not hold a beneficial interest at the time the original license  
8 was issued, shall require written notification to the board within 30 days of the  
9 transfer.

10 (2) Any transfer of the management or control over a business entity licensed  
11 by the board to a person or entity who did not have management or control over the  
12 license at the time the original license was issued, shall require written notification to  
13 the board within 30 days of the transfer.

### 14 **COST RECOVERY**

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

### 21 **FACTUAL ALLEGATIONS**

22 20. In or about April 2016, Respondents filed a Community Pharmacy Permit  
23 Application (Permit Application) with the Board. On the Permit Application, Respondents  
24 represented that Sarkisian was the Chief Executive Officer, a corporate director, and a 51% owner  
25 of Golden State, and that Apoyan was the Chief Financial Officer, a corporate director, and a 49%  
26 owner of Golden State. Sarkisian and Apoyan both signed the Permit Application on March 22,  
27 2016. The Board subsequently granted the Permit Application and issued Pharmacy Permit  
28 Number PHY 54580 based thereon.

21. From approximately March 2017 through December 2021, Respondents operated a  
retail pharmacy in Burbank, California.



1           22. In December 2021, Respondents filed a Community Pharmacy License Application  
2 (the 2021 Application) with the Board which requested a change of location for Golden State  
3 from the Burbank location to a new location in Simi Valley, California. In addition, the 2021  
4 Application represented that Sarkisian was Golden State's Chief Executive Officer, Chief  
5 Financial Officer, sole corporate director, and 100% owner. Sarkisian signed the 2021  
6 Application on December 9, 2021.

7           23. In or about January 2022, Respondents moved dangerous drugs, and records and  
8 documentation of the acquisition and disposition of dangerous drugs, to the new Simi Valley  
9 location. Sarkisian later admitted that those items remained at the Simi Valley location, even  
10 though the Board had not approved the 2021 Application. Respondents' Burbank location ceased  
11 operations as of approximately January 2022.

12           24. In response to an inquiry by Board staff regarding Golden State's ownership, Board  
13 staff was informed that Apoyan had resigned from Golden State, and furnished a resignation letter  
14 from Apoyan dated February 15, 2016. However, Respondents had never filed with the Board a  
15 change of permit application regarding Apoyan's resignation, and had renewed Pharmacy Permit  
16 Number PHY 54580 twice without informing the Board of the change in ownership and control  
17 of Golden State.

18           25. The Board denied the 2021 Application.

19           26. Meanwhile, in November 2021 the Board received a complaint from Humana, a  
20 health insurer, stating that Golden State had billed for prescriptions that were either not requested,  
21 or not received, by the respective patients.

22           27. In response to a Board inquiry, Sarkisian admitted that Golden State had billed  
23 Humana for six different prescriptions that were not received by the patients. Golden State only  
24 reversed its billing for these six prescriptions after the health insurer identified them as part of an  
25 audit.

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1 **FOURTH CAUSE FOR DISCIPLINE**

2 (Falsification of Documents)

3 34. Paragraphs 20 through 27 are incorporated herein by this reference.

4 35. Respondents are subject to disciplinary action for unprofessional conduct under Code  
5 sections 4301, subdivision (g), for knowingly signing any document that falsely represents the  
6 existence of a state of facts in that Respondents falsely represented that Apoyan was an owner,  
7 officer, and director of Golden State when Respondents initially applied for a pharmacy permit,  
8 or by failing to notify the Board of its change of ownership and control when Apoyan resigned..

9 **FIFTH CAUSE FOR DISCIPLINE**

10 (Failure to Engage in Licensed Activity for at least 120 days)

11 36. Paragraphs 20 through 27 are incorporated herein by this reference.

12 37. Respondents are subject to disciplinary action for unprofessional conduct under Code  
13 sections 4301, subdivision (o), for violating laws governing pharmacy, specifically Code section  
14 4312, subdivision (a), in that Respondent Golden State failed to engage in the ordinary activity  
15 for which its license was issued for at least one day each calendar week during a 120-day period.

16 **OTHER MATTERS**

17 38. Pursuant to Code section 4307, if discipline is imposed on Pharmacist License  
18 Number RPH 42868 issued to Maria Sarkisian, she shall be prohibited from serving as a manager,  
19 administrator, owner, member, officer, director, associate, or partner of a licensee for five years if  
20 Pharmacist License Number RPH 42868 is placed on probation or until Pharmacist License  
21 Number RPH 42868 is reinstated if it is revoked.

22 39. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit Number  
23 PHY 54580 issued to Golden State Specialty Pharmacy, Inc., with Maria Sarkisian as the owner,  
24 CEO, and pharmacist-in-charge, then Maria Sarkisian shall be prohibited from serving as a  
25 manager, administrator, owner, member, officer, director, associate, or partner of a licensee for  
26 five years if Pharmacy Permit Number PHY 54580 is placed on probation or until Pharmacy  
27 Permit Number PHY 54580 is reinstated if it is revoked.

40. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit Number PHY 54580 issued to Golden State Specialty Pharmacy, Inc., with Armen Apoyan as the owner, then Armen Apoyan shall be prohibited from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Permit Number PHY 54580 is placed on probation or until Pharmacy Permit Number PHY 54580 is reinstated if it is revoked.

## STATEMENT OF ISSUES

### **FIRST CAUSE FOR DENIAL OF APPLICATION**

41. Paragraphs 20 through 27 are incorporated herein by this reference.

42. Respondents' Community Pharmacy License Application dated December 9, 2021 is subject to denial under Code section 4300, subdivision (c), Code section 4301, subdivision (a), and Code section 4301, subdivision (f), in that Golden State obtained Pharmacy Permit Number PHY 54580 by falsifying its ownership, or in that Golden State renewed Pharmacy Permit Number PHY 54580 without informing the Board of its change of ownership and control.

## SECOND CAUSE FOR DENIAL OF APPLICATION

**(Pending Disciplinary Action)**

43. Respondents' Community Pharmacy License Application dated December 9, 2021 is subject to denial under Code sections 4302 and 4307, due to the pending disciplinary action set forth in paragraphs 28-40, above. The circumstances are as follows:

a. Pursuant to Code section 4302, if the Accusation results in discipline against Golden State, then its owner and pharmacist-in-charge, Sarkisian, shall be prohibited from owning 10% or more of any other pharmacy.

b. Pursuant to Code section 4307, if the Accusation results in discipline against Golden State, then its owner and pharmacist-in-charge, Sarkisian, shall be prohibited from owning or managing any pharmacy.

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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 Permit Number PHY 54580, issued to Golden State Specialty Pharmacy, Inc.;

2. Revoking or suspending Pharmacist License Number RPH 42868, issued to Maria Sarkisian;

3. Prohibiting Maria Sarkisian from serving as a manager, administrator, owner, member, officer, director, associate, partner, or any other person with management or control of a licensee for five years if Pharmacy Permit Number PHY 54580 is placed on probation or until Pharmacy Permit Number PHY 54580 is reinstated if revoked;

4. Prohibiting Maria Sarkisian from serving as a manager, administrator, owner, member, officer, director, associate, partner, or any other person with management or control of a licensee for five years if Pharmacist License Number RPH 42868 is placed on probation or until Pharmacist License Number RPH 42868 is reinstated if revoked;

5. Prohibiting Armen Apoyan from serving as a manager, administrator, owner, member, officer, director, associate, partner, or any other person with management or control of a licensee for five years if Pharmacy Permit Number PHY 54580 is placed on probation or until Pharmacy Permit Number PHY 54580 is reinstated if revoked;

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1           6.     Ordering Golden State Pharmacy, Inc., and Maria Sarkisian, jointly and severally, to  
2 pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case,  
3 pursuant to Business and Professions Code section 125.3; and,

4           7.     Taking such other and further action as deemed necessary and proper.  
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7           DATED: 1/23/2024

Sodergren,  
Anne@DCA

Digitally signed by  
Sodergren, Anne@DCA  
Date: 2024.01.23 10:53:06  
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ANNE SODERGREN  
Executive Officer  
Board of Pharmacy  
Department of Consumer Affairs  
State of California  
*Complainant*

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