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

In the Matter of the Accusation Against:

KACHATUR CHRIS DEMIRCHYAN
1836 N. Alexandria Ave., #8
Los Angeles, CA 90027

Pharmacy Technician License No. TCH
181607

Respondent.

Case No. 7822

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

FINDINGS OF FACT

1. On September 24, 2024, Complainant Anne Sodergren, in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs, filed Accusation Number 7822 against Kachatur Chris Demirchyan (Respondent) before the Board of Pharmacy. (Accusation attached as Exhibit A.)

2. On June 29, 2021, the Board of Pharmacy (Board) issued Pharmacy Technician License Number TCH 181607 to Respondent. The Pharmacy Technician License was in full force and effect at all times relevant to the charges brought in Accusation Number 7822 and expired on September 30, 2024. This lapse in licensure, however, pursuant to Business and

1 Professions Code section 118(b), and/or Business and Professions Code section 4300.1, does not
2 deprive the Board of its authority to continue this disciplinary proceeding.

3 3. On September 30, 2024, Respondent was served copies of the Accusation Number
4 7822, Statement to Respondent, Notice of Defense, Request for Discovery and discovery statutes
5 (Government Code sections 11507.5, 11507.6, and 11507.7) by certified and first class mail at
6 Respondent's address of record which, pursuant to Business and Professions Code section 4100,
7 is required to be reported and maintained with the Board. Respondent's address of record was
8 and is: 1836 N. Alexandria Ave., #8, Los Angeles, CA 90027.

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

11 5. Government Code section 11506(c) states, in pertinent part:

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

17 6. The Board takes official notice of its records and the fact that Respondent failed to
18 file a Notice of Defense within 15 days after service upon him of the Accusation, and therefore
19 waived his right to a hearing on the merits of Accusation Number 7822.

20 7. Government Code section 11520(a) states, in pertinent part:

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

25 8. Pursuant to its authority under Government Code section 11520, the Board finds
26 Respondent is in default. The Board will take action without further hearing and, based on the
27 relevant evidence contained in the Default Decision Investigatory Evidence Packet in this matter,
28 finds that the charges and allegations in Accusation Number 7822, are separately and severally,
found to be true and correct by clear and convincing evidence.

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1 **DETERMINATION OF ISSUES**

2 1. Based on the foregoing findings of fact, Respondent Kachatur Chris Demirchyan has
3 subjected his Pharmacy Technician License Number TCH 181607 to discipline.

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

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

8 a. Business and Professions Code section 4301, subdivision (l) - Conviction of
9 Substantially Related Crimes;

10 b. Business and Professions Code section 4301, subdivision (j) – Violation of Statutes
11 Regulating Controlled Substances and Dangerous Drugs; and

12 c. Business and Professions Code sections 4300 and 4301, subdivision (f) – Acts
13 Involving Moral Turpitude, Dishonesty, Fraud, or Deceit.

14 **ORDER**

15 IT IS SO ORDERED that Pharmacy Technician License Number TCH 181607, issued to
16 Respondent Kachatur Chris Demirchyan, is revoked.

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

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Exhibit A

Accusation

1 ROB BONTA
Attorney General of California
2 ARMANDO ZAMBRANO
Supervising Deputy Attorney General
3 THOMAS L. RINALDI
Supervising Deputy Attorney General
4 State Bar No. 206911
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6310
6 Facsimile: (916) 731-2126
Attorneys for Complainant
7

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

12 In the Matter of the Accusation Against:

Case No. 7822

13 **KACHATUR CHRIS DEMIRCHYAN**
1836 N. Alecandria Ave, #8
14 Los Angeles, CA 90027

ACCUSATION

15 Pharmacy Technician License No. TCH
181607

16 Respondent.
17

18 **PARTIES**

19
20 1. Anne Sodergren (Complainant) brings this Accusation solely in her official capacity
21 as the Executive Officer of the Board of Pharmacy (Board), Department of Consumer Affairs.

22 2. On or about June 29, 2021, the Board issued Pharmacy Technician License Number
23 TCH 181607 to Kachatur Chris Demirchyan (Respondent). The Pharmacy Technician License
24 was in full force and effect at all times relevant to the charges brought herein and will expire on
25 September 30, 2024, unless renewed.

26 **JURISDICTION**

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

1 4. Section 4300 of the Code states:

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

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

6 (1) Suspending judgment.

7 (2) Placing him or her upon probation.

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

9 (4) Revoking his or her license.

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

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

18 (1) Medical or psychiatric evaluation.

19 (2) Continuing medical or psychiatric treatment.

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

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

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

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

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

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

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

34 5. Section 4300.1 states:

35 The expiration, cancellation, forfeiture, or suspension of a board-issued license
36 by operation of law or by order or decision of the board or a court of law, the

1 placement of a license on a retired status, or the voluntary surrender of a license by a
2 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.

3 **STATUTORY PROVISIONS**

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

7 7. Section 4022 states:

8 “Dangerous drug” or “dangerous device” means any drug or device unsafe for
9 self-use in humans or animals, and includes the following:

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

11 (b) Any device that bears the statement: “Caution: federal law restricts this
12 device to sale by or on the order of a _____,” “Rx only,” or words of similar import,
the blank to be filled in with the designation of the practitioner licensed to use or
13 order use of the device.

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

15 8. Section 4301 states, in pertinent part:

16 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
17 conduct shall include, but is not limited to, any of the following:

18

19 (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
20 licensee or otherwise, and whether the act is a felony or misdemeanor or not.

21

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

23

24 (l) The conviction of a crime substantially related to the qualifications,
25 functions, and duties of a licensee under this chapter. The record of conviction of a
violation of Chapter 13 (commencing with Section 801) of Title 21 of the United
26 States Code regulating controlled substances or of a violation of the statutes of this
state regulating controlled substances or dangerous drugs shall be conclusive
27 evidence of unprofessional conduct. In all other cases, the record of conviction shall
be conclusive evidence only of the fact that the conviction occurred. The board may
28 inquire into the circumstances surrounding the commission of the crime, in order to

1 fix the degree of discipline or, in the case of a conviction not involving controlled
2 substances or dangerous drugs, to determine if the conviction is of an offense
3 substantially related to the qualifications, functions, and duties of a licensee under this
4 chapter. A plea or verdict of guilty or a conviction following a plea of nolo
5 contendere is deemed to be a conviction within the meaning of this provision. The
6 board may take action when the time for appeal has elapsed, or the judgment of
7 conviction has been affirmed on appeal or when an order granting probation is made
8 suspending the imposition of sentence, irrespective of a subsequent order under
9 Section 1203.4 of the Penal Code allowing the person to withdraw his or her plea of
10 guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or
11 dismissing the accusation, information, or indictment.

12 9. Section 4307 states:

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

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

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

(b) "Manager, administrator, owner, member, officer, director, associate,
partner, or any other person with management or control of a license" as used in this
section and Section 4308, may refer to a pharmacist or to any other person who serves
in such capacity in or for a licensee.

(c) The provisions of subdivision (a) may be alleged in any pleading filed
pursuant to Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of
the Government Code. However, no order may be issued in that case except as to a
person who is named in the caption, as to whom the pleading alleges the applicability
of this section, and where the person has been given notice of the proceeding as
required by Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of
the Government Code. The authority to proceed as provided by this subdivision shall
be in addition to the board's authority to proceed under Section 4339 or any other
provision of law.

REGULATORY PROVISIONS

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

(a) For the purpose of denial, suspension, or revocation of a personal or facility
license pursuant to Section 141 or Division 1.5 (commencing with Section 475) of the
Business and Professions Code, a crime, professional misconduct, or act shall be

1 considered substantially related to the qualifications, functions or duties of the
2 practice, profession, or occupation that may be performed under the license type
3 sought or held if to a substantial degree it evidences present or potential unfitness of
4 an applicant or licensee to perform the functions authorized by the license in a
5 manner consistent with the public health, safety, or welfare.

6 (b) In making the substantial relationship determination required under
7 subdivision (a) for a crime, the board will consider the following criteria:

8 (1) The nature and gravity of the offense;

9 (2) The number of years elapsed since the date of the offense; and

10 (3) The nature and duties of the practice, profession, or occupation that may be
11 performed under the license type sought or held.

12 (c) For purposes of subdivision (a), substantially related crimes, professional
13 misconduct, or acts shall include, but are not limited to, those which:

14 (1) Violate or attempt to violate, directly or indirectly, or to aid, abet or
15 conspire to violate, any provision of law of this state, or any other jurisdiction,
16 governing the practice of pharmacy.

17 (2) Violate or attempt to violate, directly or indirectly, or to aid, abet or
18 conspire to violate, any provision of Chapter 13 (commencing with Section 801) of
19 Title 21 of the United States Code regulating controlled substances or any law of this
20 state, or any other jurisdiction, relating to controlled substances or dangerous drugs.

21 (3) Violate or attempt to violate, directly or indirectly, or to aid, abet or
22 conspire to violate, any provision of law of this state, or any other jurisdiction,
23 relating to government provided or government supported healthcare.

24 (4) Involve dishonesty, fraud, deceit, or corruption related to money, items,
25 documents, or personal information.

26 (5) Involve a conviction for driving under the influence of drugs or alcohol.

27 **COST RECOVERY**

28 11. Section 125.3 states, in pertinent part, that the Board may request the administrative
law judge to direct a licentiate found to have committed a violation or violations of the licensing
act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
case.

12. **CONTROLLED SUBSTANCES / DANGEROUS DRUGS**

a. "Alprazolam," is a Schedule IV controlled substance pursuant to Health and Safety
Code section 11057, subdivision (d)(1) and is a dangerous drug pursuant to section 4022.

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1 placed Respondent on formal probation for two years, with terms and conditions. The
2 circumstances surrounding the conviction are that on or about April 6, 2023, police officers
3 conducted an enforcement stop. While speaking to Respondent, the officer observed in plain
4 view several torch lighters in the center console and passenger door pocket. An officer also
5 noticed there was Narcan in the passenger door pocket. Respondent was asked to step out of the
6 vehicle several times but initially refused to do so. When Respondent did step out of the vehicle,
7 he attempted to pull away from officers and was placed under arrest for resisting and obstructing
8 a police officer. During a search of the vehicle, officers found a plastic baggie containing one
9 ounce of a white crystalline like substance recognized as methamphetamine, several empty plastic
10 baggies, and a small digital scale in the center console. The search also revealed the following
11 additional items: two new glass smoking pipes, and several credit and debit cards, drivers
12 licenses, and insurance cards belonging to others. During the booking procedure, Respondent was
13 also found to be in possession of nine Alprazolam pills.

14 b. On or about February 29, 2024, after pleading nolo contendere, Respondent was
15 convicted of one felony count of violating Health and Safety Code section 11378 [possess
16 controlled substance for sale] in the criminal proceeding entitled *The People of the State of*
17 *California v. Kachatur Chris Demirchyan* (Super. Ct. L.A. County, 2024, No. GA115084). The
18 court placed Respondent on formal probation for two years, with terms and conditions. The
19 circumstances surrounding the conviction are that on or about June 19, 2023, a law enforcement
20 officer observed a parked vehicle next to a Walgreens parking lot and conducted a record check
21 of the license plate that revealed the registration tags were fraudulent. Upon contact with
22 Respondent, he informed the officer that the vehicle did not belong to him and refused to exit the
23 vehicle when asked to do so. After several requests, other officers arrived to assist and were able
24 to pull him out of the vehicle before he was placed under arrest for obstructing and resisting an
25 officer. While searching his person, an officer found California EBT and Medi-CAL cards
26 belonging to other persons. During a search of the vehicle, officers found the following items: a
27 digital scale containing white crystalline residue; two bags containing white crystalline residue
28 recognized as methamphetamine; a plastic bag containing an off-white chalky pill recognized as

1 Fentanyl; two glass pipes commonly used to smoke methamphetamine with white crystalline
2 residue; and a bag containing several prescription bottles not prescribed to Respondent. They
3 also found various pills, including 19 pills suspected to be Fentanyl, 25 Codeine pills, 1 Butalbital
4 pill, 30 Zolpidem Tartrate pills, and 80 Hydrocodone pills. Lastly, officers additionally found two
5 debit cards belonging to another person; bag containing 5 bags of white crystalline substance
6 (approximately 30 grams each); plastic baggies; a bag containing U.S. Resident Alien card issued
7 to another person; a stolen California license plate; and a bag containing approximately 1.5
8 pounds of marijuana.

9 **SECOND CAUSE FOR DISCIPLINE**

10 **(Violated Statutes regulating controlled substances and dangerous drugs)**

11 14. Respondent is subject to disciplinary action under section 4301, subdivision (j), on
12 the grounds of unprofessional conduct, in that on or about June 19, 2023, Respondent violated
13 statutes regulating controlled substances and dangerous drugs. Complainant refers to, and by this
14 reference incorporates, the allegations set forth above in paragraph 13, as though fully set forth
15 herein.

16 **THIRD CAUSE FOR DISCIPLINE**

17 **(Acts Involving Moral Turpitude, Dishonesty, Fraud, or Deceit)**

18 15. Respondent is subject to disciplinary action under Code sections 4300 and 4301,
19 subdivision (f), in that Respondent committed acts involving moral turpitude, dishonesty, fraud,
20 deceit, or corruption. Complainant refers to and by this reference incorporates the allegations set
21 forth above in paragraph 13, as though fully set forth herein.

22 **DISCIPLINE CONSIDERATIONS**

23 16. To determine the degree of discipline, if any, to be imposed on Respondent,
24 Complainant alleges as follows:

25 a. On or about August 15, 2013, Respondent was convicted of one felony count of
26 violating Health and Safety Code section 11378 [possession of a controlled substance for sale] in
27 the criminal proceeding entitled *The People of the State of California v. Kachatur Chris*
28 *Dermirchyan* (Super. Ct. L.A. County, 2013, No. BA403605.)

1 b. August 15, 2013, Respondent was convicted of one felony count of violating Penal
2 Code section 495 [burglary] and one felony count of violating Penal Code section 484E,
3 subdivision (d) [grand theft of access cards] in the criminal proceeding entitled *The People of the*
4 *State of California v. Kachatur Chris Dermirchyan* (Super. Ct. L.A. County, 2013, No.
5 BA411839).

6 c. On or about February 8, 2013, after pleading guilty, Respondent was convicted of one
7 misdemeanor count of violating Health and Safety Code section 11378 [possession of a controlled
8 substance for sale] in the criminal proceeding entitled *The People of the State of California v.*
9 *Kachatur Chris Dermirchyan* (Super. Ct. L.A. County, 2013, No. BA403605).

10 d. On or about August 9, 2012, Respondent was convicted of one felony count of
11 violating Health and Safety Code section 11378 [possession of a controlled substance] in the
12 criminal proceeding entitled *The People of the State of California v. Kachatur Chris Dermirchyan*
13 (Super. Ct. L.A. County, 2012, No. BA396968).

14 e. On or about April 29, 2011, Respondent was convicted of one misdemeanor count of
15 violating Penal Code section 484, subdivision (a) [petty theft] in the criminal proceeding entitled
16 *The People of the State of California v. Kachatur Chris Dermirchyan* (Super. Ct. L.A. County,
17 2011, No. 0BR03486-02).

18 f. On or about November 24, 2009, Respondent was convicted of one misdemeanor
19 count of violating Penal Code section 484, subdivision (a) [petty theft] in the criminal proceeding
20 entitled *The People of the State of California v. Kachatur Chris Dermirchyan* (Super. Ct. L.A.
21 County, 2009, No. 9GN03448).

22 g. On or about October 8, 2008, Respondent was convicted of one misdemeanor count
23 of violating Vehicle Code section 12500, subdivision (a) [unlicensed driver] in the criminal
24 proceeding entitled *The People of the State of California v. Kachatur Chris Dermirchyan* (Super.
25 Ct. L.A. County, 2009, No. 8MP12160).

26 h. On or about January 10, 2008, Respondent was convicted of one misdemeanor count
27 of violating Vehicle Code section 14601.1, subdivision (a) [driving with a suspended license] in

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1 i. the criminal proceeding entitled *The People of the State of California v. Kachatur*
2 *Chris Dermirchyan* (Super. Ct. L.A. County, 2008, No. 7GN05593).

3 j. On or about October 16, 2007, Respondent was convicted of one misdemeanor count
4 of violating Vehicle Code section 23152, subdivision (a) [driving while under the influence of
5 alcohol] in the criminal proceeding entitled *The People of the State of California v. Kachatur*
6 *Chris Dermirchyan* (Super. Ct. L.A. County, 2007, No. 7BR02561).

7 k. On or about May 14, 2007, Respondent was convicted of one misdemeanor count of
8 violating Penal Code section 490.1 [petty theft] and one misdemeanor count of violating Vehicle
9 Code section 14610, subdivision (A)(7) [photograph, photostat, duplicate, or in any way
10 reproduce any driver's license] in the criminal proceeding entitled *The People of the State of*
11 *California v. Kachatur Chris Dermirchyan* (Super. Ct. L.A. County, 2007, No. 7PS60598).

12 l. On or about April 10, 2007, Respondent was convicted of one misdemeanor count of
13 violating Vehicle Code section 12500, subdivision (a) [driving without a license] in the criminal
14 proceeding entitled *The People of the State of California v. Kachatur Chris Dermirchyan* (Super.
15 Ct. L.A. County, 2007, No. 7GN00587).

16 m. On or about June 21, 1996, Respondent was convicted of one misdemeanor count of
17 violating Vehicle Code section 2800.1 [evade police] in the criminal proceeding entitled *The*
18 *People of the State of California v. Kachatur Chris Dermirchyan* (Super. Ct. L.A. County, 1996,
19 No. 6MT02665).

20 **OTHER MATTERS**

21 17. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Technician
22 License Number TCH 181607 issued to Kachatur Chris Demirchyan, Kachatur Chris Demirchyan
23 shall be prohibited from serving as a manager, administrator, owner, member, officer, director,
24 associate, or partner of a licensee for five years if Pharmacy Technician License Number TCH
25 181607 is placed on probation or until Pharmacy Technician License Number TCH 181607 is
26 reinstated if it is revoked

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PRAYER

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

1. Revoking or suspending Pharmacy Technician License Number TCH 181607, issued to Kachatur Chris Demirchyan;

2. Prohibiting Kachatur Chris Demirchyan from serving as a manager, administrator, owner, member, officer, director, associate, or partner of a licensee for five years if Pharmacy Technician License Number TCH 181607 is placed on probation or until Pharmacy Technician License Number TCH 181607 is reinstated if Pharmacy Technician License Number TCH 181607 issued to Kachatur Chris Demirchyan is revoked;

3. Ordering Kachatur Chris Demirchyan 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, if placed on probation, the costs of probation monitoring; and,

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

DATED: 9/24/2024

Sodergren, Digitally signed by
Anne@DCA Sodergren, Anne@DCA
Date: 2024.09.24
18:26:46 -07'00'

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

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