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

12 In the Matter of the Statement of Issues  
13 Against:

14 **AMIR KATIRAEI**

15 **Intern Pharmacist License Applicant**

16 Respondent.

Case No. 8114

**STATEMENT OF ISSUES**

17 **PARTIES**

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

21 2. On September 20, 2022, the Board issued Intern Pharmacist License Number INT  
22 50363 to Respondent. The Intern Pharmacist License was canceled on November 7, 2024, and  
23 has not been renewed.

24 3. On or about May 23, 2025, the Board received an application for an Intern Pharmacist  
25 License from Amir Katiraei (Respondent). On or about May 23, 2025, Respondent certified  
26 under penalty of perjury to the truthfulness of all statements, answers, and representations in the  
27 application. The Board denied the application on September 22, 2025.

28 ///

1 **JURISDICTIONAL AND STATUTORY PROVISIONS**

2 4. This Statement of Issues is brought before the Board under the authority of the  
3 following laws. All section references are to the Business and Professions Code (Code) unless  
4 otherwise indicated.

5 5. Code section 118 states:

6 (a) The withdrawal of an application for a license after it has been filed with a  
7 board in the department shall not, unless the board has consented in writing to such  
8 withdrawal, deprive the board of its authority to institute or continue a proceeding  
9 against the applicant for the denial of the license upon any ground provided by law or  
10 to enter an order denying the license upon any such ground.

11 (b) The suspension, expiration, or forfeiture by operation of law of a license  
12 issued by a board in the department, or its suspension, forfeiture, or cancellation by  
13 order of the board or by order of a court of law, or its surrender without the written  
14 consent of the board, shall not, during any period in which it may be renewed,  
15 restored, reissued, or reinstated, deprive the board of its authority to institute or  
16 continue a disciplinary proceeding against the licensee upon any ground provided by  
17 law or to enter an order suspending or revoking the license or otherwise taking  
18 disciplinary action against the licensee on any such ground.

19 (c) As used in this section, "board" includes an individual who is authorized by  
20 any provision of this code to issue, suspend, or revoke a license, and "license"  
21 includes "certificate," "registration," and "permit."

22 6. Code section 4208 states:

23 (a) At the discretion of the board, an intern pharmacist license may be issued  
24 for a period of:

25 (1) One to six years to a person who is currently enrolled in a school of  
26 pharmacy recognized by the board.

27 (2) Two years to a person who is a graduate of a school of pharmacy  
28 recognized by the board and who has applied to become licensed as a  
pharmacist in California.

(3) Two years to a foreign graduate who has met educational  
requirements described in paragraphs (1) and (2) of subdivision (a) of Section  
4200.

(4) One year to a person who has failed the pharmacist licensure  
examination four times and has reenrolled in a school of pharmacy to satisfy  
the requirements of Section 4200.1.

(b) The board may issue an intern pharmacist license to an individual for the  
period of time specified in a decision of reinstatement adopted by the board.

(c) An intern pharmacist shall notify the board within 30 days of any change of  
address.

1 (d) An intern pharmacist whose license has been issued pursuant to paragraph  
2 (1) or (4) of subdivision (a) shall return his or her license, by registered mail, within  
3 30 days of no longer being enrolled in a school of pharmacy. The intern pharmacist  
4 license shall be canceled by the board. Notwithstanding subdivision (c), an intern  
5 pharmacist license may be reinstated if the student reenrolls in a school of pharmacy  
6 recognized by the board to fulfill the education requirements of paragraphs (1) to (4),  
7 inclusive, of subdivision (a) of Section 4200.

8 (e) A person who has not completed the experience requirements necessary to  
9 be eligible for the licensure examination may have his or her intern license extended  
10 for a period of up to two years at the discretion of the board if he or she is able to  
11 demonstrate his or her inability to exercise the privileges of the intern license during  
12 the initial license period.

13 7. Code section 4300, states in part:

14 ...

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

21 (1) Medical or psychiatric evaluation.

22 (2) Continuing medical or psychiatric treatment.

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

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

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

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

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

8. Code section 4300.1 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

1 a decision suspending or revoking the license.

2 9. Code section 4301 states:

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

6 ...

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

10 ...

11 10. Code section 4307, subdivision (a), states:

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

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

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

### **REGULATORY PROVISIONS**

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

22 (a) For the purpose of denial, suspension, or revocation of a personal or facility  
23 license pursuant to Section 141 or Division 1.5 (commencing with Section 475) of the  
24 Business and Professions Code, a crime, professional misconduct, or act shall be  
25 considered substantially related to the qualifications, functions or duties of the  
26 practice, profession, or occupation that may be performed under the license type  
27 sought or held if to a substantial degree it evidences present or potential unfitness of  
28 an applicant or licensee to perform the functions authorized by the license in a  
manner consistent with the public health, safety, or welfare.

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

(1) The nature and gravity of the offense;

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

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

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

6 ...

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

9 ....

### 10 **OTHER MATTERS**

11 12. Pursuant to Code section 4307, if Intern Pharmacist License Number INT 50363,  
12 issued to Respondent Amir Katiraei, is revoked, he shall be prohibited from serving as a manager,  
13 administrator, owner, member, officer, director, associate, or partner of a licensee until the Intern  
14 Pharmacist License is reinstated.

### 15 **CAUSE FOR DENIAL OF APPLICATION**

#### 16 **(Unprofessional Conduct Involving Moral Turpitude, Dishonesty, Fraud, Deceit, or 17 Corruption)**

18 13. Respondent's application for an intern pharmacist license is subject to denial under  
19 Code section 4300, subdivision (c), in conjunction with Code section 4301, subdivision (f), in that  
20 Respondent engaged in unprofessional conduct by committing any act involving moral turpitude,  
21 dishonesty, fraud, deceit, or corruption. The circumstances are as follows:

22 14. In September 2024, Respondent was completing clinical rotations at a hospital in  
23 Santa Monica, California to satisfy requirements of the curriculum at Chapman University, where  
24 Respondent was then enrolled as a pharmacy student. Respondent was tasked with reviewing  
25 patient records of those who had received albumin, to assess whether its use was appropriate  
26 compared to alternative fluids such as lactated Ringer's solution or normal saline. Respondent  
27 was granted access to patient data for this project.

28 15. Between September 22, 2024, and September 23, 2024, Respondent inappropriately  
accessed 10 protected patient health records that were unrelated to Respondent's assignment.

