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

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

13 **HELPING HANDS PHARMACY, INC.,**
14 **DBA HELPING HANDS PHARMACY**

15 **Community Pharmacy License Applicant**

16 Respondent.

Case No. 8185

STATEMENT OF ISSUES

17
18
19 **PARTIES**

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

23 2. On or about September 9, 2025, the Board received an application for a Community
24 Pharmacy License from Helping Hands Pharmacy, Inc., dba Helping Hands Pharmacy
25 (Respondent). The application identified Vage Stepanyan as the 100% owner. On or about
26 September 5, 2025, Mr. Stepanyan certified under penalty of perjury to the truthfulness of all
27 statements, answers, and representations in the application. The Board denied the application on
28 December 16, 2025.

JURISDICTION

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

4. Section 4300, subdivision (c), states, in pertinent part:

The board may refuse a license to any applicant guilty of unprofessional conduct.

STATUTORY PROVISIONS

5. Section 475 states, in pertinent part:

(a) Notwithstanding any other provisions of this code, the provisions of this division shall govern the denial of licenses on the grounds of:

(1) Knowingly making a false statement of material fact, or knowingly omitting to state a material fact, in an application for a license.

...

(3) Commission of any act involving dishonesty, fraud or deceit with the intent to substantially benefit himself or another, or substantially injure another.

(4) Commission of any act which, if done by a licentiate of the business or profession in question, would be grounds for suspension or revocation of license.

6. Section 4301 states, in pertinent part:

Unprofessional conduct includes, 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.

...

(p) Actions or conduct that would have warranted denial of a license.

1 7. Section 4307 states, in pertinent part:

2 (a) Any person who has been denied a license or whose license has been revoked or is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

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

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

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

20 (c) The provisions of subdivision (a) may be alleged in any pleading filed pursuant to
21 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the Government Code.
22 However, no order may be issued in that case except as to a person who is named in the caption,
23 as to whom the pleading alleges the applicability of this section, and where the person has been
24 given notice of the proceeding as required by Chapter 5 (commencing with Section 11500) of Part
25 1 of Division 3 of the Government Code. The authority to proceed as provided by this subdivision
26 shall be in addition to the board's authority to proceed under Section 4339 or any other provision
27 of law.

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FACTUAL ALLEGATIONS

8. Vage Stepanyan holds Pharmacy Technician License Number TCH 19922.

9. On or about September 5, 2025, Respondent submitted a Community Pharmacy License Application with the required affidavits, including the Individual Financial Affidavit.

10. Question 4E of the Individual Financial Affidavit asked: "Will funding be provided in any amount from a person whose professional or vocational license has been denied or whose license has been revoked, suspended, placed on probation, or otherwise disciplined in California or any other state, jurisdiction, territory, or country?" Respondent checked: "No."

11. As part of the application review process, the Board conducts research to verify the validity of any identified funding sources listed in the application.

12. According to Respondent's Individual Financial Affidavit, the source of funding for the pharmacy was derived from a loan in the amount of \$60,000 from Golden Grain Bake House & Café, LLC. Mr. Stepanyan signed a promissory note for this loan on August 13, 2025.

13. As of May 1, 2025, Golden Grain Bake House & Café, LLC was not in good standing with the Franchise Tax Board. Its status was suspended, and it could not legally operate in California, which would include being prohibited from providing funding to a new pharmacy.

14. According to the most recent Statement of Information, Margarita Kazarian was the sole manager of Golden Grain Bake House & Café, LLC. Ms. Kazarian signed the \$60,000 promissory note as "Manager/CEO" on behalf of Golden Grain Bake House & Café, LLC on August 13, 2025. The Board confirmed that Ms. Kazarian held Pharmacist License Number RPH 45273, which has been revoked.

15. On April 11, 1995, the Board issued Pharmacy Permit Number PHY 40833 to Adams Square Pharmacy. The owner was Ms. Kazarian. On November 18, 2014, the Board revoked Ms. Kazarian's pharmacist license and Adams Square Pharmacy's pharmacy permit.

16. On May 4, 2010, the Board issued Pharmacy Permit Number PHY 50214 to Kenneth Road Pharmacy. The owner was Ms. Kazarian. On August 29, 2016, the Board revoked Kenneth Road Pharmacy's pharmacy permit in Board case number 5377.

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17. On May 28, 2004, the Board issued Pharmacy Permit Number PHY 46623 to Park West Pharmacy. The owner was Ms. Kazarian. On August 29, 2016, the Board revoked Park West Pharmacy's pharmacy permit in Board case number 5378.

18. In Board case numbers 5377 and 5378, the decisions noted that following the revocation of her pharmacist license, Ms. Kazarian attempted to sell Kenneth Road Pharmacy and Park West Pharmacy to a pharmacy technician for \$825,000 and \$520,000, respectively. The pharmacy technician had no substantial capital with which to purchase the pharmacies and did not own property against which she could borrow funds to finance the purchase of a business. The sole source of funding for the purchases was promissory notes in favor of Ms. Kazarian. The transactions were determined to not be good-faith, arms-length transactions and were not approved.

FIRST CAUSE FOR DENIAL

(Moral turpitude, Dishonesty, Fraud, Deceit, or Corruption)

19. Respondent's application is subject to denial under sections 4300, subdivision (c), and 475, in conjunction with section 4301, subdivision (f), in that Respondent committed act(s) involving moral turpitude, dishonesty, fraud, deceit, or corruption. The sole source of funding for the pharmacy was a loan, with the promissory note signed by Margarita Kazarian, whose pharmacist license was revoked. Respondent provided false information on the Individual Financial Affidavit by attesting under the penalty of perjury that the funding for the pharmacy was not from a source whose professional license had been revoked. Paragraphs 8 to 18 are re-alleged as if fully set forth herein.

SECOND CAUSE FOR DENIAL

(False Representation)

20. Respondent's application is subject to denial under sections 4300, subdivision (c), and 475, in conjunction with section 4301, subdivision (g), in that Respondent knowingly signed the Community Pharmacy License Application that falsely represented that the funding for the pharmacy was not from a source whose professional license had been revoked. Paragraphs 8 to 18 are re-alleged as if fully set forth herein.

1 **THIRD CAUSE FOR DENIAL**

2 (Misrepresentation)

3 21. Respondent's application is subject to denial under sections 4300, subdivision (c),
4 and 475, in conjunction with section 4301, subdivision (a), in that Respondent misrepresented on
5 the Individual Financial Affidavit that the funding for the pharmacy was not from a source whose
6 professional license had been revoked. Paragraphs 8 to 18 are re-alleged as if fully set forth
7 herein.

8 **FOURTH CAUSE FOR DENIAL**

9 (Action or Conduct Warranting Denial)

10 22. Respondent's application is subject to denial under sections 4300, subdivision (c),
11 and 475, in conjunction with section 4301, subdivision (p), in that Respondent misrepresented on
12 the Individual Financial Affidavit that the funding for the pharmacy was not from a source whose
13 professional license had been revoked. Paragraphs 8 to 18 are re-alleged as if fully set forth
14 herein.

15 **FIFTH CAUSE FOR DENIAL**

16 (Unprofessional Conduct)

17 23. Respondent's application is subject to denial under sections 4300, subdivision (c),
18 and 475, in conjunction with section 4301, in that Respondent committed unprofessional conduct.
19 Respondent misrepresented on the Individual Financial Affidavit that the funding for the
20 pharmacy was not from a source whose professional license had been revoked. Paragraphs 8 to 18
21 are re-alleged as if fully set forth herein.

22 **OTHER MATTERS**

23 24. Pursuant to section 4307, if Helping Hands Pharmacy, Inc. has been denied a license
24 or its license has been revoked or is under suspension, or if Helping Hands Pharmacy, Inc. has
25 been a manager, administrator, owner, member, officer, director, associate, partner, or any other
26 person with management or control of any partnership, corporation, trust, firm, or association
27 whose application for a license has been denied or revoked, is under suspension or has been
28 placed on probation, Helping Hands Pharmacy, Inc. shall be prohibited from serving as a

1 manager, administrator, owner, member, officer, director, associate, partner, or in any other
2 position with management or control of a licensee for five years if a probationary license is issued
3 or if the license is denied, the prohibition shall continue until the license is issued.

4 25. Pursuant to section 4307, if Vage Stepanyan has been denied a license or his license
5 has been revoked or is under suspension, or if Vage Stepanyan has been a manager, administrator,
6 owner, member, officer, director, associate, partner, or any other person with management or
7 control of any partnership, corporation, trust, firm, or association whose application for a license
8 has been denied or revoked, is under suspension or has been placed on probation, Vage Stepanyan
9 shall be prohibited from serving as a manager, administrator, owner, member, officer, director,
10 associate, partner, or in any other position with management or control of a licensee for five years
11 if a probationary license is issued or if the license is denied, the prohibition shall continue until
12 the license is issued.

13 **PRAYER**

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

16 1. Denying the application of Helping Hands Pharmacy, Inc., dba Helping Hands
17 Pharmacy for a Community Pharmacy License;

18 2. If Helping Hands Pharmacy, Inc. is denied a license or its license has been revoked or
19 is under suspension, or if Helping Hands Pharmacy, Inc. has been a manager, administrator,
20 owner, member, officer, director, associate, partner, or any other person with management or
21 control of any partnership, corporation, trust, firm, or association whose application for a license
22 has been denied or revoked, is under suspension or has been placed on probation, prohibiting
23 Helping Hands Pharmacy, Inc. from serving as a manager, administrator, owner, member, officer,
24 director, associate, partner, or in any other position with management or control of a licensee for
25 five years if a probationary license is issued or if the license is denied, the prohibition shall
26 continue until the license is issued;

27 3. If Vage Stepanyan is denied a license or his license has been revoked or is under
28 suspension, or if Vage Stepanyan has been a manager, administrator, owner, member, officer,

1 director, associate, partner, or any other person with management or control of any partnership,
2 corporation, trust, firm, or association whose application for a license has been denied or revoked,
3 is under suspension or has been placed on probation, prohibiting Vage Stepanyan from serving as
4 a manager, administrator, owner, member, officer, director, associate, partner, or in any other
5 position with management or control of a licensee for five years if a probationary license is issued
6 or if the license is denied, the prohibition shall continue until the license is issued;

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

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9 DATED: 5/31/2026

Sodergren,
Anne@DCA

Digitally signed by
Sodergren, Anne@DCA
Date: 2026.05.31 18:44:45
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ANNE SODERGREN
Executive Officer
Board of Pharmacy
Department of Consumer Affairs
State of California
Complainant

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