

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

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

**LA CARE PHARMACY, INC., DBA LA CARE PHARMACY,  
LILIT HAKOBYAN**

**Pharmacy Permit No. PHY 57545,**

**and**

**CHRISTINE AMANDA GEDJEYAN**

**Pharmacist License No. RPH 79233**

**Respondents.**

**Agency Case No. 7245**

## DECISION AND ORDER

The attached Stipulated Surrender of License 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 July 7, 2023.

It is so ORDERED on June 7, 2023.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

By

A handwritten signature in black ink, appearing to read "Seung W. Oh". The signature is written in a cursive style with a large initial "S".

Seung W. Oh, Pharm.D.  
Board President

1 ROB BONTA  
Attorney General of California  
2 NANCY A. KAISER  
Supervising Deputy Attorney General  
3 CRISTINA FELIX  
Deputy Attorney General  
4 State Bar No. 195663  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
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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:

Case No. 7245

13 **LA CARE PHARMACY, INC. DBA LA**  
**CARE PHARMACY, LILIT HAKOBYAN**  
14 **721 E. Broadway, Ste. 101**  
**Glendale, CA 91205**

15 **Permit No. PHY 57545,**

16 **and**

17 **CHRISTINE AMANDA GEDJEYAN**  
18 **7712 Via Napoli**  
**Burbank, CA 91504**

19 **Pharmacist License No. RPH 79233**

20 Respondents.  
21

**STIPULATED SURRENDER OF**  
**LICENSE AND ORDER ONLY AS TO**  
**RESPONDENT LA CARE PHARMACY,**  
**INC., DBA LA CARE PHARMACY**

22 In the interest of a prompt and speedy settlement of this matter, consistent with the public  
23 interest and the responsibilities of the Board of Pharmacy ("Board"), the parties hereby agree to  
24 the following Stipulated Surrender of License and Order which will be submitted to the Board for  
25 the Board's approval and adoption as the final disposition of the Accusation solely with respect to  
26 LA Care Pharmacy, Inc., doing business as LA Care Pharmacy, Lilit Hakobyan, 100%  
27 Shareholder, Chief Executive Officer, President, Secretary, Treasurer/Chief Financial Officer,  
28

1 and Director (“Respondent LA Care Pharmacy”). This Stipulated Surrender of License and Order  
2 does not apply to Respondent Christine Amanda Gedjeyan.

3 **PARTIES**

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

7 2. Respondent LA Care Pharmacy is represented in this proceeding by attorney Herbert  
8 L. Weinberg, Esq., whose address is: 1990 South Bundy Drive, Suite 777, Los Angeles, CA  
9 90025.

10 3. On or about February 3, 2020, the Board issued Permit Number PHY 57545 to  
11 Respondent LA Care Pharmacy. The Permit was in full force and effect at all times relevant to  
12 the charges brought herein and was set to expire on February 1, 2023, unless renewed. On  
13 October 31, 2022, the license was cancelled pursuant to a written request submitted by  
14 Respondent LA Care Pharmacy. Christine Amanda Gedjeyan (“Respondent Gedjeyan”) was the  
15 pharmacist-in-charge of Respondent LA Care Pharmacy from February 3, 2020, until December  
16 27, 2021.

17 **JURISDICTION**

18 4. Accusation No. 7245 was filed before the Board, and is currently pending against  
19 Respondent LA Care Pharmacy. The Accusation and all other statutorily required documents  
20 were properly served on Respondent LA Care Pharmacy on June 30, 2022. Respondent LA Care  
21 Pharmacy timely filed its Notice of Defense contesting the Accusation. A copy of Accusation  
22 No. 7245 is attached as **Exhibit A** and incorporated by reference.

23 **ADVISEMENT AND WAIVERS**

24 5. Respondent LA Care Pharmacy has carefully read, fully discussed with counsel, and  
25 understands the charges and allegations in Accusation No. 7245. Respondent LA Care Pharmacy  
26 also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated  
27 Surrender of License and Order.

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1 no force or effect, except for this paragraph, it shall be inadmissible in any legal action between  
2 the parties, and the Board shall not be disqualified from further action by having considered this  
3 matter.

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

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

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

15 **ORDER**

16 IT IS HEREBY ORDERED that Pharmacy Permit No. PHY 57545, issued to Respondent  
17 LA Care Pharmacy, Inc., doing business as LA Care Pharmacy, Lilit Hakobyan, 100%  
18 Shareholder, Chief Executive Officer, President, Secretary, Treasurer/Chief Financial Officer,  
19 and Director, is surrendered and accepted by the Board.

20 1. The surrender of Respondent's Permit and the acceptance of the surrendered permit  
21 by the Board shall constitute the imposition of discipline against Respondent LA Care Pharmacy.  
22 This stipulation constitutes a record of the discipline and shall become a part of Respondent LA  
23 Care Pharmacy's license history with the Board. Respondent understands and agrees that for  
24 purposes of Business and Professions Code section 4307, this surrender shall be construed the  
25 same as revocation.

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

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

4           4.     If Respondent LA Care Pharmacy or Lilit Hakobyan ever applies for licensure or  
5 petitions for reinstatement in the State of California, the Board shall treat it as a new application  
6 for licensure. They must comply with all the laws, regulations and procedures for licensure in  
7 effect at the time the application or petition is filed, and all of the charges and allegations  
8 contained in Accusation No. 7245 shall be deemed to be true, correct and admitted by Respondent  
9 LA Care Pharmacy and Lilit Hakobyan when the Board determines whether to grant or deny the  
10 application or petition. Respondent LA Care Pharmacy is required to report this surrender as  
11 disciplinary action. Respondent LA Care Pharmacy may not apply for any license, permit, or  
12 registration from the Board for three years from the effective date of this decision.

13           5.     Respondent LA Care Pharmacy shall pay the agency its costs of investigation and  
14 enforcement in the amount of \$4,943 prior to issuance of a new or reinstated license.

15           6.     If Respondent LA Care Pharmacy or Lilit Hakobyan should ever apply or reapply for  
16 a new license or certification, or petition for reinstatement of a license, by any other health care  
17 licensing agency in the State of California, all of the charges and allegations contained in  
18 Accusation, No. 7245 shall be deemed to be true, correct, and admitted by Respondent LA Care  
19 Pharmacy and Lilit Hakobyan for the purpose of any Statement of Issues or any other proceeding  
20 seeking to deny or restrict licensure.

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1 ACCEPTANCE

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

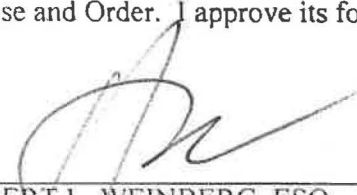
7  
8 DATED: 3.23.2023



9 LA CARE PHARMACY, INC. DBA LA  
10 CARE PHARMACY, LILIT HAKOBYAN.  
11 100% SHAREHOLDER, CEO, PRESIDENT,  
12 SECRETARY, TREASURER, CFO, AND  
DIRECTOR  
BY: LILIT HAKOBYAN  
*Respondent*

13 I have read and fully discussed with Respondent LA Care Pharmacy, Inc., doing business as  
14 LA Care Pharmacy, Lilit Hakobyan, 100% Shareholder, Chief Executive Officer, President,  
15 Secretary, Treasurer/Chief Financial Officer, and Director, the terms and conditions and other  
16 matters contained in this Stipulated Surrender of License and Order. I approve its form and  
17 content.

18 DATED: 3/23/2023



19 HERBERT L. WEINBERG, ESQ.  
20 Fenton Law Group, LLP  
*Attorney for Respondent*

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**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: 03/23/23

Respectfully submitted,

ROB BONTA  
Attorney General of California  
NANCY A. KAISER  
Supervising Deputy Attorney General

*Cristina Felix*

CRISTINA FELIX  
Deputy Attorney General  
*Attorneys for Complainant*

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**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  
NANCY A. KAISER  
Supervising Deputy Attorney General

CRISTINA FELIX  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 7245**

1 ROB BONTA  
Attorney General of California  
2 NANCY A. KAISER  
Supervising Deputy Attorney General  
3 STEPHEN D. SVETICH  
Deputy Attorney General  
4 State Bar No. 272370  
300 So. Spring Street, Suite 1702  
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6 Facsimile: (916) 731-2126  
E-mail: Stephen.Svetich@doj.ca.gov  
7 *Attorneys for Complainant*

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

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13 **LA CARE PHARMACY, INC., DOING**  
14 **BUSINESS AS LA CARE PHARMACY,**  
15 **LILIT HAKOBYAN**  
16 **721 E. Broadway, Ste. 101**  
17 **Glendale, CA 91205**

**ACCUSATION**

18 **Permit No. PHY 57545,**

19 **and**

20 **CHRISTINE AMANDA GEDJEYAN**  
21 **7712 Via Napoli**  
22 **Burbank, CA 91504**

23 **Pharmacist License No. RPH 79233**

24 Respondents.

25 **PARTIES**

26 1. Anne Sodergren (“Complainant”) brings this Accusation solely in her official  
27 capacity as the Executive Officer of the Board of Pharmacy (“Board”), Department of Consumer  
28 Affairs.

29 2. On or about February 3, 2020, the Board issued Permit Number PHY 57545 to LA  
30 Care Pharmacy, Inc., doing business as LA Care Pharmacy, Lilit Hakobyan, 100% Shareholder,

1 Chief Executive Officer, President, Secretary, Treasurer/Chief Financial Officer, and Director  
2 (“Respondent LA Care Pharmacy”). The Permit was in full force and effect at all times relevant  
3 to the charges brought herein and will expire on February 1, 2023, unless renewed. Christine  
4 Amanda Gedjeyan (“Respondent Gedjeyan”) was the pharmacist-in-charge of Respondent LA  
5 Care Pharmacy from February 3, 2020, until December 27, 2021.

6 3. On or about September 25, 2018, the Board issued Pharmacist License Number RPH  
7 79233 to Respondent Gedjeyan. The Pharmacist License was in full force and effect at all times  
8 relevant to the charges brought herein and will expire on January 31, 2024, unless renewed.

### 9 JURISDICTION

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

13 5. Section 4300 of the Code states:

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

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

17 (1) Suspending judgment.

18 (2) Placing him or her upon probation.

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

20 (4) Revoking his or her license.

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

23 ...

24 (e) The proceedings under this article shall be conducted in accordance with  
25 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the  
26 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.

27 6. Section 4300.1 of the Code states:

28 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

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

8 8. Section 4307 of the Code states:

9 (a) Any person who has been denied a license or whose license has been revoked or  
10 is under suspension, or who has failed to renew his or her license while it was under  
11 suspension, or who has been a manager, administrator, owner, member, officer, director,  
12 associate, partner, or any other person with management or control of any partnership,  
13 corporation, trust, firm, or association whose application for a license has been denied or  
14 revoked, is under suspension or has been placed on probation, and while acting as the  
15 manager, administrator, owner, member, officer, director, associate, partner, or any other  
16 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:

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

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

21 (b) “Manager, administrator, owner, member, officer, director, associate, partner, or  
22 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.

23 (c) The provisions of subdivision (a) may be alleged in any pleading filed pursuant to  
24 Chapter 5 (commencing with Section 11500 ) of Part 1 of Division 3 of the Government  
25 Code. However, no order may be issued in that case except as to a person who is named in  
26 the caption, as to whom the pleading alleges the applicability of this section, and where the  
27 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.

///

**STATUTORY PROVISIONS**

9. Section 4022 of the Code states:

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

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

(b) Any device that bears the statement: Caution: federal law restricts this 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 order use of the device.

(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.

10. Section 4040 of the Code states, in pertinent part:

(a) "Prescription" means an oral, written, or electronic transmission order that is both of the following:

(1) Given individually for the person or persons for whom ordered that includes all of the following:

....

(D) Either rubber stamped, typed, or printed by hand or typeset, the name, address, and telephone number of the prescriber, the prescriber's license classification, and the prescriber's federal registry number, if a controlled substance is prescribed.

....

11. Section 4059 of the Code states, in pertinent part:

(a) A person may not furnish any dangerous drug, except upon the prescription pursuant to Section 3640.7. A person may not furnish any dangerous device, except upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7.

....

12. Section 4113 of the Code states:

(a) Every pharmacy shall designate a pharmacist-in-charge and, within 30 days thereof, shall notify the board in writing of the identity and license number of that pharmacist and the date he or she was designated.



1 (b) The proposed pharmacist-in-charge shall be subject to approval by the  
2 board. The board shall not issue or renew a pharmacy license without identification of  
3 an approved pharmacist-in-charge for the pharmacy.

4 (c) The pharmacist-in-charge shall be responsible for a pharmacy's compliance  
5 with all state and federal laws and regulations pertaining to the practice of  
6 pharmacy...

7 13. Section 4156 of the Code states, "A pharmacy corporation shall not do, or fail to do,  
8 any act where doing or failing to do the act would constitute unprofessional conduct under any  
9 statute or regulation. In the conduct of its practice, a pharmacy corporation shall observe and be  
10 bound by the laws and regulations that apply to a person licensed under this chapter."

11 14. Section 4301 of the Code states:

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

15 ...

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

18 ...

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

### 24 **STATE REGULATORY AUTHORITY**

25 15. California Code of Regulations, title 16, section 1761, states:

26 (a) No pharmacist shall compound or dispense any prescription which  
27 contains any significant error, omission, irregularity, uncertainty, ambiguity or  
28 alteration. Upon receipt of any such prescription, the pharmacist shall contact the  
prescriber to obtain the information needed to validate the prescription.

...

### **COST RECOVERY**

16. Section 125.3 of the Code 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

1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
2 enforcement of the case.

3 **DEFINITIONS**

4 17. The following drugs and controlled substances are relevant to the charges alleged  
5 herein:

6 **TABLE NUMBER 1**  
7 **Drug and Controlled Substance Definitions**

8 <b>BRAND NAME</b>	9 <b>GENERIC NAME</b>	10 <b>DANGEROUS DRUG PER B&amp;P CODE § 4022</b>	11 <b>CONTROLLED SUBSTANCE PER HEALTH AND SAFETY CODE</b>	12 <b>INDICATIONS FOR USE</b>
13 Bensal HP 14 3% 15 Ointment	16 Benzoic 17 acid/Salicylic Acid	18 Yes	19 No	20 Skin Irritation
21 Not 22 Applicable	23 Betamethasone	24 Yes	25 No	26 Steroid Cream for 27 Itch/Eczema
28 Migranal	Dihydroergotamine	Yes	No	Migraine/ Headache
Voltaren	Diclofenac	Yes	No	Anti- Inflammatory/ Pain
Nalfon	Fenopren 200 mg Capsule	Yes	No	Anti- Inflammatory/ Pain
DermacinRx	Folic Acid/Vitamin D	Yes	No	Supplement
Halucort Gel	Emollient Combination /Hyaluronic Acid	Yes	No	Dermatitis
Nizoral	Ketoconazole Cream	Yes	No	Fungal Infection

1	NutriaRx CreamPak	Triamcinolone/ Dimethicone/ Silicone Tape	Yes	No	Skin Irritation
2					
3	Pliaglis	Lidocaine/ Tetracaine Cream	Yes	No	Topical Pain Relief
4					
5	Ortho DF	Folic Acid/Vitamin D	Yes	No	Supplement
6					
7	Vfend	Voriconazole	Yes	No	Fungal Infection
8					
9	Zelac Probiotic	Bifidobacterium/ Lactobacillus	No	No	Supplement
10					

11 **FACTUAL ALLEGATIONS**

12 18. The Board received a complaint from Humana, an insurance company, stating that  
13 some of Humana’s members denied requesting and/or receiving services from United Family  
14 Pharmacy. The Board initiated an investigation into United Family Pharmacy. During that  
15 investigation, the Board learned that Patient M. R. had received three creams labeled with Patient  
16 M.R.’s name and prescriber Dr. J. F. Each of the three creams was dispensed by Respondent LA  
17 Care Pharmacy. The patient did not expect or request the creams from LA Care Pharmacy. The  
18 Board investigated Respondent LA Care Pharmacy’s dispensing activity as part of the United  
19 Family Pharmacy investigation.

20 19. A Board inspector inspected Respondent LA Care Pharmacy on July 15, 2021. The  
21 pharmacy was closed, but the inspector contacted Respondent Gedjeyan by phone, and  
22 Respondent Gedjeyan met the inspector at the pharmacy. The inspector completed a general  
23 inspection and reviewed the prescription books. She pulled the original faxed prescription and  
24 prescription delivery receipt for Patient M. R. Respondent LA Care Pharmacy’s records indicated  
25 that in addition to the three creams Patient M. R. received, diclofenac 50 mg tab #60 was also  
26 purportedly dispensed and delivered to Patient M. R. on April 14, 2021. Patient M. R. denied  
27 receiving this medication.

1           20. The faxed prescription document for Patient M. R. contained a pre-printed, multiple  
2 checkoff prescription form, with 26 different medications listed. Xanax, a controlled substance,  
3 was one of the preprinted medications on the prescription form. The inspector also reviewed  
4 Respondent LA Care Pharmacy’s dispensing records for Dr. J. F., a prescriber at Clinicas Del  
5 Valle (“CDV”),<sup>1</sup> who purportedly wrote the prescriptions for Patient M. R.

6           21. Respondent LA Care Pharmacy dispensed 971 prescriptions purportedly written by  
7 Dr. J. F. between March 2021 and April 2021. Most of these prescriptions mirrored the  
8 prescription for Patient M. R. Each fax looked identical, except for patient name, birthdate, and  
9 date of the prescription. The origin of the faxes was not identified. The patients all resided in or  
10 around Calexico, California, or El Centro, California, more than 200 miles from Respondent LA  
11 Care Pharmacy. All 971 prescriptions identified Dr. J. F.’s address as 120 W. Cole Road,  
12 Calexico, California. However, that was not the correct address that Respondent LA Care  
13 Pharmacy had on file for CDV or Dr. J. F.<sup>2</sup>

14           22. On August 4, 2021, the Board’s inspector spoke to Dr. J. F. regarding the  
15 prescriptions attributed to her that were filled by Respondent LA Care Pharmacy. Dr. J. F. stated  
16 that she never authorized any prescriptions for ketoconazole cream (podiatry related) or  
17 diclofenac oral tablets. If a prescription form prescribed either of these medications, Dr. J. F. did  
18 not authorize it. Dr. J. F. stated that after evaluating a patient, she started them on a topical  
19 diclofenac (Volaren) gel, and sometimes betamethasone. Dr. J. F. stated she never checked more  
20 than two medications on a prescription form. She stated if there was a prescription form with  
21 more than two medications checked, it was done without her consent. Of the 971 prescriptions  
22 purportedly written by Dr. J. F. that Respondent LA Care Pharmacy dispensed between March  
23 2021 and April 2021, Dr. J. F. did not authorize 247 prescriptions for Ketoconazole 2% cream  
24 and 252 prescriptions for diclofenac 50 mg tablets.

25           23. The Board’s inspector also observed several prescriptions purportedly written by  
26 prescriber Dr. K. A. from CDV that did not contain the address and telephone number of the

27 <sup>1</sup> CDV is in Calexico, California.

28 <sup>2</sup> The address Respondents had on file for CDV and Dr. J. F. was 802 E. Birch Street, Suite 5,  
Calexico, CA.

1 prescriber. Between March 2021 and April 2021, Respondent LA Care Pharmacy dispensed 60  
2 faxed prescriptions pursuant to prescriptions that did not contain the address and telephone  
3 number of prescriber Dr. K. A.

4 24. While inspecting Respondent LA Care Pharmacy’s prescription books, the Board’s  
5 inspector observed prescriptions written by Physicians Assistant R. A. from Uptimum Medical  
6 Group (“UMG”). The prescriptions were signed by PA R. A., but dispensed and billed under Dr.  
7 S. W. Some of the prescriptions had handwriting stating “verified # per MD,” or change “to  
8 Folixapure and verified # per MD,” or words to that effect. Respondent Gedjeyan stated it was  
9 her handwriting, and she would make the notations after verifying the prescriptions (or changes to  
10 the prescriptions) with PA R. A. The prescriptions also appeared to be sent from “Restore  
11 Health” not UMG. Ultimately, Dr. S. W. confirmed that he did not authorize 83 prescriptions  
12 attributed to him and dispensed by Respondent LA Care Pharmacy. Dr. S. W. also confirmed that  
13 no one at Respondent LA Care Pharmacy ever contacted him to discuss or verify the  
14 prescriptions.

15 **FIRST CAUSE FOR DISCIPLINE**

16 **(Violation of Statutes: Furnishing Dangerous Drugs Without a Prescription**

17 **– Respondent LA Care Pharmacy)**

18 25. Respondent LA Care Pharmacy’s pharmacy permit is subject to disciplinary action  
19 under Code sections 4301, subdivision (j), and 4059, subdivision (a), in that Respondents  
20 furnished dangerous drugs without authorized prescriptions. Specifically, Respondents dispensed  
21 83 prescriptions under Dr. S. W.’s name, 247 prescriptions for ketoconazole under Dr. J. F.’s  
22 name, and 252 prescriptions for diclofenac 50 mg tablets under Dr. J. F.’s name. However, Dr. S.  
23 W. and Dr. J. F. confirmed that they did not authorize these prescriptions. Complainant refers to  
24 and by this reference incorporates the allegations set forth above in paragraphs 17 through 24,  
25 inclusive, as though set forth fully herein.

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1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Violation of Statutes: Filling Non-Compliant Prescriptions**

3 **– Respondent LA Care Pharmacy)**

4 26. Respondent LA Care Pharmacy’s pharmacy permit is subject to disciplinary action  
5 under Code sections 4301, subdivision (j), and 4040, subdivisions (a)(1)(D), in that Respondents  
6 dispensed dangerous drugs pursuant to prescriptions that did not meet the form requirements  
7 outlined in Code section 4040. Specifically, Respondents dispensed 60 prescriptions pursuant to  
8 faxed prescriptions from prescriber Dr. K. A. that did not contain either rubber stamped, typed, or  
9 printed name, address and telephone number of the prescriber and 971 prescriptions from  
10 prescriber Dr. J. F. that identified an incorrect address for CDV and Dr. J. F. Complainant refers  
11 to and by this reference incorporates the allegations set forth above in paragraphs 17 through 24,  
12 inclusive, as though set forth fully herein.

13 **THIRD CAUSE FOR DISCIPLINE**

14 **(Violation of Statutes: Furnishing Dangerous Drugs Without a Prescription**

15 **– Respondent Gedjeyan)**

16 27. Respondent Gedjeyan’s pharmacist license is subject to disciplinary action under  
17 Code sections 4301, subdivision (j), 4059, subdivision (a), and 4113, subdivision (c), in that  
18 Respondents furnished dangerous drugs without authorized prescriptions. Specifically,  
19 Respondents dispensed 83 prescriptions under Dr. S. W.’s name, 247 prescriptions for  
20 ketoconazole under Dr. J. F.’s name, and 252 prescriptions for diclofenac 50 mg tablets under Dr.  
21 J. F.’s name. However, Dr. S. W. and Dr. J. F. confirmed that they did not authorize these  
22 prescriptions. Complainant refers to and by this reference incorporates the allegations set forth  
23 above in paragraphs 17 through 24, inclusive, as though set forth fully herein.

24 **FOURTH CAUSE FOR DISCIPLINE**

25 **(Violation of Statutes: Filling Non-Compliant Prescriptions – Respondent Gedjeyan)**

26 28. Respondent Gedjeyan’s pharmacist license is subject to disciplinary action under  
27 Code sections 4301, subdivision (j), 4040, subdivisions (a)(1)(D), and 4113, subdivision (c), in  
28 that Respondents dispensed dangerous drugs pursuant to prescriptions that did not meet the form

1 requirements outlined in Code section 4040. Specifically, Respondents dispensed 60  
2 prescriptions pursuant to faxed prescriptions from prescriber Dr. K. A. that did not contain either  
3 rubber stamped, typed, or printed name, address and telephone number of the prescriber and 971  
4 prescriptions to patients of prescriber Dr. J. F. that identified an incorrect address for CDV and  
5 Dr. J. F. Complainant refers to and by this reference incorporates the allegations set forth above  
6 in paragraphs 18 through 26, inclusive, as though set forth fully herein.

7 **OTHER MATTERS**

8 29. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit Number  
9 PHY 57545, issued to Respondent LA Care Pharmacy, Inc., Lilit Hakobyan shall be prohibited  
10 from serving as a manager, administrator, owner, member, officer, director, associate, or partner  
11 of a licensee for five years if Pharmacy Permit Number 57545 is placed on probation or until  
12 Pharmacy Permit Number 31167 is reinstated if it is revoked.

13 30. Pursuant to Code section 4307, if discipline is imposed on Pharmacy Permit Number  
14 PHY 57545, issued to Respondent LA Care Pharmacy, Inc., doing business as LA Care  
15 Pharmacy, while Lilit Hakobyan was an officer and owner and had knowledge of or knowingly  
16 participated in any conduct for which the licensee was disciplined, Lilit Hakobyan shall be  
17 prohibited from serving as a manager, administrator, owner, member, officer, director, associate,  
18 or partner of a licensee for five years if Pharmacy Permit Number PHY 57545 is placed on  
19 probation or until Pharmacy Permit Number PHY 57545 is reinstated if it is revoked.

20 31. Pursuant to Code section 4307, if discipline is imposed on Pharmacist License  
21 Number RPH 79233, issued to Respondent Christine Amanda Gedjeyan, she shall be prohibited  
22 from serving as a manager, administrator, owner, member, officer, director, associate, or partner  
23 of a licensee for five years if Pharmacist License Number RPH 79233 is placed on probation or  
24 until Pharmacist License Number RPH 79233 is reinstated if it is revoked.

25 **PRAYER**

26 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
27 and that following the hearing, the Board of Pharmacy issue a decision:  
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1           1.     Revoking or suspending Permit Number PHY 57545, issued to LA Care Pharmacy,  
2 Inc., doing business as LA Care Pharmacy, Lilit Hakobyan, 100% Shareholder, Chief Executive  
3 Officer, President, Secretary, Treasurer/Chief Financial Officer, and Director;

4           2.     Revoking or suspending Pharmacist License Number RPH 79233, issued to Christine  
5 Amanda Gedjeyan;

6           3.     Ordering LA Care Pharmacy and Christine Amanda Gedjeyan to pay the Board of  
7 Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to  
8 Business and Professions Code section 125.3;

9           4.     Prohibiting LA Care Pharmacy, Inc., from serving as a manager, administrator,  
10 owner, member officer, director, associate, or partner of a licensee for five years if Pharmacy  
11 Permit Number PHY 57545 is placed on probation or until Pharmacy Permit Number PHY 57545  
12 is reinstated if Pharmacy Permit Number 57545 issued to LA Care Pharmacy, Inc., doing business  
13 as LA Care Pharmacy, Lilit Hakobyan, 100% Shareholder, Chief Executive Officer, President,  
14 Secretary, Treasurer/Chief Financial Officer, and Director, is revoked;

15          5.     Prohibiting Christine Amanda Gedjeyan from serving as a manager, administrator,  
16 owner, member officer, director, associate, or partner of a licensee for five years if Pharmacy  
17 Permit Number PHY 57545 is placed on probation or until Pharmacy Permit Number PHY 57545  
18 is reinstated if Pharmacy Permit Number 57545 issued to LA Care Pharmacy, Inc., doing business  
19 as LA Care Pharmacy, Lilit Hakobyan, 100% Shareholder, Chief Executive Officer, President,  
20 Secretary, Treasurer/Chief Financial Officer, and Director, is revoked; and

21          6.     Prohibiting Christine Amanda Gedjeyan from serving as a manager, administrator,  
22 owner, member officer, director, associate, or partner of a licensee for five years if Pharmacist  
23 License Number RPH 79233 is placed on probation or until Pharmacist License Number RPH  
24 79233 is reinstated if Pharmacist License Number RPH 79233 issued to Christine Amanda  
25 Gedjeyan is revoked; and

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

DATED: 6/16/2022

Signature on File

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

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