

**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



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
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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:

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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1 **ADVISEMENT AND WAIVERS**

2 5. GSSP has carefully read, fully discussed with counsel, and understands the charges
3 and allegations in Accusation No. 7453. GSSP also has carefully read, fully discussed with
4 counsel, and understands the effects of this Stipulated Surrender of License and Order.

5 6. GSSP is fully aware of its legal rights in this matter, including the right to a hearing
6 on the charges and allegations in the Accusation; the right to confront and cross-examine the
7 witnesses against it; the right to present evidence and to testify on its own behalf; the right to the
8 issuance of subpoenas to compel the attendance of witnesses and the production of documents;
9 the right to reconsideration and court review of an adverse decision; and all other rights accorded
10 by the California Administrative Procedure Act and other applicable laws.

11 7. GSSP voluntarily, knowingly, and intelligently waives and gives up each and every
12 right set forth above.

13 **CULPABILITY**

14 8. GSSP admits the truth of each and every charge and allegation in First Amended
15 Accusation No. 7453 and Statement of Issues No. 7355, agrees that cause exists for discipline and
16 hereby surrenders its Pharmacy Permit No. PHY 54580 for the Board's formal acceptance.

17 9. GSSP understands that by signing this stipulation it enables the Board to issue an
18 order accepting the surrender of its Pharmacy Permit without further process.

19 **CONTINGENCY**

20 10. This stipulation shall be subject to approval by the Board. GSSP understands and
21 agrees that counsel for Complainant and the staff of the Board may communicate directly with the
22 Board regarding this stipulation and surrender, without notice to or participation by Respondent
23 or its counsel. By signing the stipulation, GSSP understands and agrees that it may not withdraw
24 its agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon
25 it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender
26 and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be
27 inadmissible in any legal action between the parties, and the Board shall not be disqualified from
28 further action by having considered this matter.

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

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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: 02/25/2024 maria sarkisian
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: 2/26/24 Paul L. Cass
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: 2/26/24 Respectfully submitted,
ROB BONTA
Attorney General of California
SHAWN P. COOK
Supervising Deputy Attorney General
Matthew S. Beasley
MATTHEW S. BEASLEY
Deputy Attorney General
Attorneys for Complainant

Exhibit A

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

1 ROB BONTA
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2 SHAWN P. COOK
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3 MATTHEW S. BEASLEY
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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 **ACCUSATION**

2 **FIRST CAUSE FOR DISCIPLINE**

3 (Transfer and Warehousing of Pharmacy Records at Unlicensed Location)

4 28. Paragraphs 20 through 27 are incorporated herein by this reference.

5 29. Respondents are subject to disciplinary action for unprofessional conduct under Code
6 section 4301, subdivision (o), in that Respondents violated laws governing pharmacy by failing to
7 comply with Code sections 4105, subdivision (a), 4169, subdivision (a), and 4333, subdivision
8 (a), when Respondents moved to, and thereafter stored at, dangerous drugs, and records and
9 documentation of the acquisition and disposition of dangerous drugs, an unlicensed location.

10 **SECOND CAUSE FOR DISCIPLINE**

11 (Improper Billing)

12 30. Paragraphs 20 through 27 are incorporated herein by this reference.

13 31. Respondents are subject to disciplinary action for unprofessional conduct under Code
14 section 4301, subdivisions (f) and (o), for acts involving moral turpitude, dishonesty, fraud,
15 deceit, or corruption, and for violating laws governing pharmacy, specifically, Code section
16 4306.5, subdivision (a), in that Respondents billed a health insurer for prescriptions which
17 patients did not request or receive.

18 **THIRD CAUSE FOR DISCIPLINE**

19 (Concealing Ownership of License)

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

21 33. Respondents are subject to disciplinary action for unprofessional conduct under Code
22 section 4301, subdivisions (f) and (o), for acts involving moral turpitude, dishonesty, fraud,
23 deceit, or corruption, and for violating regulations governing pharmacy, specifically, Regulations
24 section 1709, subdivision (b), in that Respondents falsely represented that Apoyan was an owner,
25 officer, and director of Golden State when Respondents initially applied for a pharmacy permit,
26 or by failing to notify the Board of its change of ownership and control when Apoyan resigned.

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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.

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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