

KARYN E, POLITO

Lieutenant Governor

The Commonwealth of Massachusetts

Executive Office of Health and Human Services
Department of Public Health
Division of Health Professions Licensure
239 Causeway Street, Suite 500, Boston, MA 02114

Tel: 617-973-0800 TTY: 617-973-0988 www.mass.gov/dph/boards MARYLOU SUDDERS Secretary MONICA BHAREL, MD, MPH Commissioner

February 16, 2016

VIA FIRST CLASS AND CERTIFIED MAIL RETURN RECEIPT REQUESTED NO. 7015 3010 0001 7080 0133 Alexandria Sahara Valdez



RE: In the Matter of Alexandria Sahara Valdez, PT License No. 17873

Board of Registration in Pharmacy Docket No. PHA-2014-0117

Dear Ms. Valdez:

Enclosed is the *Final Decision and Order by Default ("Final Order")* issued by the Board of Registration in Pharmacy (Board) in connection with the above-referenced matter. The effective date of the Board's Order is ten (10) days from the date appearing on page 3 of the *Final Order* ("Date Issued"). Your appeal rights are noted on page 3 of the *Final Order*.

Sincerely,

David Sencabaugh, R. Ph.

Executive Director

Enc.

cc: Attorney Patricia Blackburn, Prosecuting Counsel

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY

BOARD OF REGISTRATION IN PHARMACY

In the Matter of ALEXANDRIA SAHARA VALDEZ PT Registration No. 17873 REG. EXP. DATE 07/14/16

Docket No. PHA-2014-0117

FINAL DECISION AND ORDER BY DEFAULT

On October 19, 2015, the Board of Registration in Pharmacy ("Board") issued and duly served on Alexandria Sahara Valdez, PT Registration No. 17873 ("Respondent") an Order to Show Cause related to a complaint filed with the Board regarding Respondent's license. In addition to stating the allegations against Respondent, the Order to Show Cause notified Respondent that an Answer to the Order to Show Cause ("Answer") was to be submitted within 21 days of receipt of the Order to Show Cause.² The Order to Show Cause also notified Respondent of the right to request a hearing on the allegations and that any hearing request ("Request for Hearing") was to be submitted within 21 days of receipt of the Order to Show Cause.³ Respondent was further notified that failure to submit an Answer within 21 days "shall constitute a waiver of the right to a hearing" and "shall result in the entry of default" and, if defaulted, "the Board may enter a Final Decision and Order that assumes the truth of the allegations in this Order to Show Cause, and may revoke, suspend, or take other disciplinary action against [Respondent's] registration to practice as a [p]harmacy [t]echnician...including any right to renew [Respondent's] license." A copy of the Order to Show Cause is attached to this proposed Final Decision and Order by Default and is incorporated herein by reference.

To date, Respondent has failed to file either an Answer or a Request for Hearing.

¹ Order to Show Cause was issued pursuant to 801 CMR 1.01(6)(a).

² In accordance with 801 CMR 1.01(6)(d).

In accordance with G.L. c. 112, § 61.

The Board has afforded Respondent an opportunity for a full and fair hearing on the allegations in the Order to Show Cause, as required by G.L. c. 30A, § 10, as well as sufficient notice of the issues involved to afford Respondent reasonable opportunity to prepare and present evidence and argument, as required by G.L. c. 30A, § 11(1). The Board has also notified Respondent of the obligation under 801 CMR 1.01(6)(d) to file an Answer to the Show Cause Order within 21 days of its receipt and of the consequences of failing to file an Answer or otherwise respond.

The Board may make informal disposition of any adjudicatory proceeding by default. G.L. c. 30A, § 10(2). Upon default, the allegations of the complaint against Respondent are accepted as true. *Danca Corp. v. Raytheon Co.*, 28 Mass. App. Ct. 942, 943 (1990).

Based on the foregoing, the Board enters a default in the above-captioned matter and, consequently, the allegations in the Order to Show Cause are deemed to be true and Respondent has waived the right to be heard. In accordance with the Board's authority and statutory mandate, the Board orders as follows:

On January 5, 2016, in accordance with the Board's authority and statutory mandate, the Board voted to issue this Final Decision and Order by Default and REVOKE Respondent's pharmacy technician registration (No. 17873), effective ten days from the Date Issued, by the following vote:

In favor:

Patrick Gannon; Ed Taglieri; Richard Tinsley; Timothy Fensky;

Garrett Cavanaugh; Andrew Stein; Phillippe Bouvier; Catherine

Basile; Karen Conley; Susan Cornacchio

Opposed:

None

Abstained:

None

Recused:

Michael Godek

Absent:

Ali Raja; William Cox

The Board will not review any petition for reinstatement of Respondent's pharmacy technician license prior to February 22, 2021.

While Respondent's pharmacy technician registration is revoked, Respondent may not: (1) be employed as pharmacy technician to provide any services related to the practice of pharmacy or be employed to provide any services in any capacity in any pharmacy setting in the Commonwealth; or (2) have any ownership, management or other interest or involvement in any pharmacy related business in any setting.

EFFECTIVE DATE OF ORDER

The Final Decision and Order by Default shall be effective 10 days from the Date Issued.

RIGHT TO APPEAL

Respondent is hereby notified of the right to appeal this Final Decision and Order to the Supreme Judicial Court, pursuant to M.G.L. c. 112, § 64 and M.G.L. c. 30A, §§ 14 and 15, within thirty (30) days of receipt of notice of this Final Decision and Order by Default.

BOARD OF REGISTRATION

IN PHARMACY

David Sencabangh, R. Ph.

Executive Director

Date Issued: February 16, 2016

7

Notice to:

BY FIRST CLASS MAIL AND CERTIFIED MAIL RETURN RECEIPT REQUESTED

Alexandria Sahara Valdez



BY HAND

Patricia Blackburn, Esq.
Office of Prosecutions
Department of Public Health
Division of Health Professions Licensure
239 Causeway Street
Boston, MA 02114



CHARLES D. BAKER
Governor

KARYN E. POLITO
Lieutenent Governor

The Commonwealth of Massachusetts Executive Office of Health and Human Services Department of Public Health

Department of Public Health
Division of Health Professions Licensure
239 Causeway Street, Suite 500, Boston, MA 02114

Tel: 617-973-0800 TTY: 617-973-0988 Fax: 617-973-0986 www.mass.gov/dph/boards MARYLOU SUDDERS Secretary EILEEN M. SULLIVAN Acting Commissioner

October 19, 2015

BY FIRST CLASS AND CERTIFIED MAIL (return-receipt requested) 7009 1680 0001 1520 2976

Alexandria Sahara Valdez



RE:

In the Matter of Alexandria S. Valdez, PT 17873

Board of Registration in Pharmacy Docket No. PHA-2014-0117

Dear Ms. Valdez:

The Massachusetts Board of Registration in Pharmacy within the Department of Public Health, Division of Health Professions Licensure (Board), has completed its investigation of the above-listed complaint against your registration to practice as a Pharmacy Technician. For the reasons set forth in the attached Order to Show Cause, the Board is proposing to suspend, revoke or impose other discipline against your registration to practice as a Pharmacy Technician (PT Registration No. 17873).

The Order to Show Cause and any subsequent hearing are governed by the State Administrative Procedure Act, G.L. c. 30A, and the Standard Adjudicatory Rules of Practice and Procedure, 801 CMR 1.01 et. seq. You must submit an Answer to the Order to Show Cause and you have a right to request a hearing by filing a written request for a hearing, as specified in the Order to Show Cause.

Your failure to submit an Answer to the Order to Show Cause within twenty-one (21) days of receipt of the Order to Show Cause shall result in the entry of default in the above-referenced matter. Your failure to submit a written request for a hearing within twenty-one (21) days of receipt of this Order to Show Cause shall constitute a waiver of the right to a hearing on the allegations therein and on any Board disciplinary action. Notwithstanding the earlier filing of an Answer and/or request for a hearing, your failure to respond to notices or correspondence, failure to appear for any scheduled status conference, pre-hearing conference or hearing dates, or failure to otherwise defend this action shall result in the entry of default.

If you are defaulted, the Board may enter a Final Decision and Order that assumes the truth of the allegations in this Order to Show Cause, and may revoke, suspend, or take

other disciplinary action against your registration to practice as a Pharmacy Technician in Massachusetts, including any right to renew your license.

The request for a hearing and your Answer must be filed with Patricia M. Blackburn, Prosecuting Counsel, at the following address:

Patricia M. Blackburn, Esq. Prosecuting Counsel Department of Public Health Office of the General Counsel 239 Causeway Street, Suite 500 Boston, Massachusetts 02114

If you are represented by an attorney in this matter, all communications should be made through your attorney. You may contact me at (617) 973-0841 if you have any questions regarding this matter.

Yours truly,

Patricia M. Blackburn Prosecuting Counsel

Encl: Order to Show Cause Certificate of Service

This is an important notice. Please have it translated. Este é um aviso importante. Queim mandá-lo traduzir. Esce es un aviso importante. Sirvase mandarlo traducir. DAY LÀ MỘT BẢN THỐNG CÁO QUAN TRONG XIN VUI LÒNG CHO DỊCH LẠI THỐNG CÁO ÂY Coci est important. Yeuillez faire traduire. 本通知很重要。指考之体成中文

ΠΡΟΣΟΧΗ, AYTO EINAI ΣΗΜΑΝΤΙΚΟ. ΠΑΡΑΚΑΛΘ ΜΕΤΑΦΡΑΣΤΕ Questo è un 'avviso importante. Si pregadi farlo tradurre.

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY		BOARD OF REGISTRATION IN PHARMACY
In the Matter of Alexandria Sahara Valdez PT Registration No. 17873 Reg. Exp. 7/14/16)	Docket No. PHA-2014-0117

ORDER TO SHOW CAUSE

Alexandria Sahara Valdez, you are hereby ordered to appear and show cause why the Massachusetts Board of Registration in Pharmacy ("Board") should not suspend, revoke or otherwise take action against your Pharmacy Technician registration, Registration No. PT 17873, or your right to renew such registration, pursuant to Massachusetts General Laws (G.L.) chapter 112, §§ 42A and 61, and Board regulations 247 CMR 2.00, et seq., based upon the following facts and allegations:

- 1. On or about September 21, 2011, you commenced employment with Walgreen Pharmacy #1862, located at 450 Paradise Road, Swampscott, Massachusetts ("Walgreens").
- 2. In April 2012, you began working in the Pharmacy Department of Walgreens as a Pharmacy Technician Trainee.
- 3. In or about February 2014, you filed a Pharmacy Technician Registration Application for registration as a Pharmacy Technician in Massachusetts, which you had notarized, in which you reported that you had not passed a Board-approved Pharmacy Technician Assessment examination.
- 4. In or about March 2014, you filed a second such Pharmacy Technician Registration Application in which you reported that you had passed a Board-approved Pharmacy Technician Assessment examination on April 19, 2012.
- 5. On divers dates and occasions, including from in or about November 2013 to March 27, 2014, while working at Walgreens, including while working as a Pharmacy Technician Trainee, you diverted in excess of fourteen hundred hydrocodone/apap tablets, a Schedule III Controlled Substance ("hydrocodone").

¹ Pursuant to 21 U.S.C. 811(a) and 21 U.S.C. 812(b)(2), the United States Department of Justice, Drug Enforcement Administration ("DEA"), re-classified all hydrocodone combination products ("HCPs") as Schedule II (previously they were Schedule III) of the Controlled Substances Act, effective October 6,

- 6. You did not have a legitimate prescription for the hydrocodone identified in the immediately preceding paragraph.
- 7. On or about March 27, 2014, you signed the following documents at Walgreens:
 - a. A voluntary statement wherein you admitted to diverting fifteen (15) hydrocodone tablets over the course of the prior four (4) months.
 - b. An agreement to repay Walgreens restitution in the amount of \$139.28.
- 8. On or about March 27, 2014, you were interviewed by a Swampscott Police Officer, during which you:
 - a. Stated that you did not sign the statement referenced in the immediately preceding paragraph while under duress.
 - b. Admitted to diverting hydrocodone tablets from Walgreens for the personal use of your boyfriend and yourself.
- 9. On or about March 27, 2014, you were terminated as an employee of Walgreens as a result of your admission to diverting hydrocodone.
- 10. While employed as a Pharmacy Technician Trainee at Walgreens, you worked in excess of one thousand hours.
- 11. On or about March 28, 2014, the Board issued to you a Pharmacy Technician registration, Registration No. 17873. Your license is current and expires on July 14, 2016.
- 12. On or about May 1, 2014, the Board sent you a letter by first class mail to your address of record, seeking your response to the allegations concerning the above referenced matter.
- 13. On or about May 9, 2014, the Board received your undated response, wherein you denied the allegations of diverting hydrocodone, in essence, retracting your prior voluntary admission.
- 14. On or about April 9, 2015, the Board sent you a letter, with a Consent Agreement for Voluntary Surrender ("Agreement") enclosed, by first class mail, to your address of record, suggesting that you sign and return the Agreement, along with

^{2014. 21} CFR 1308. HCPs are identified as "pharmaceuticals containing specified doses of hydrocodone in combination with other drugs in specified amounts" 21 CFR 1308. The rescheduling of HCPs as a Schedule II Controlled Substance was based on the DEA's finding of substantial evidence of its potential for abuse, 21 CFR 1308. Here, where all of the prescription incidents involving HCP products occurred before its rescheduling, such references are made as a Schedule III Controlled Substance.

your Pharmacy Technician registration, on or before May 7, 2015, and advising you that your failure to so comply would result in initiation of adjudicatory action.

- a. You did not respond to this letter.
- b. This letter was not returned to the Board.
- 15. On or about May 8, 2015, the Board sent you a second letter, with the Agreement enclosed, by first class mail and Certified Mail No. 7009 2250 0001 8154 9050, to your address of record, suggesting that you sign and return the Agreement, along with your Pharmacy Technician registration, on or before May 29, 2015, and advising you that your failure to so comply would result in initiation of adjudicatory action.
 - a. You did not respond to this letter.
 - b. This letter was not returned to the Board.
- 16. On or about July 16, 2015, the Board sent you a third letter, with the Agreement enclosed, by first class mail and Certified Mail No. 7014 2120 0002 1353 5206, to your address of record, suggesting that you sign and return the Agreement, along with your Pharmacy Technician registration, on or before July 24, 2015, and advising you that your failure to so comply would result in initiation of adjudicatory action.
 - a. You did not respond to this letter.
 - b. This letter was not returned to the Board.

RELATED CRIMINAL MATTER

- 17. On or about April 24, 2014, you were arraigned in Lynn District Court, Criminal Docket No. on one (1) count of violation of G.L. c. 94C, § 33(b) (Drugs Obtained by Fraud), related to the circumstances described above in paragraphs 5-8.
- 18. On or about July 17, 2014, you voluntarily entered into the Essex County District Attorney's Office Drug Diversion Program in relation to Criminal Docket No.
- 19. On or about June 26, 2015, you were expelled from the Essex County District Attorney's Office Drug Diversion Program for being non-compliant with their requirements for participation.
- 20. On or about July 1, 2015, your case, Criminal Docket No. was put back on the trial list.

21. On or about October 13, 2015, you appeared in Lynn District Court and admitted to sufficient facts for a finding of guilt on Criminal Docket No. however, a finding of guilt did not enter at that time and the matter was Continued Without a Finding until April 13, 2016, during which time you were ordered to remain drug free and submit to random urine screenings.

OTHER CONDUCT

- 22. On or about July 28, 2015, your Pharmacy Technician Registration No. PT 17873 was located in an automobile, registered to you, during the arrest of a male individual, identified as your boyfriend (Boyfriend), for distribution of a Class A substance, to wit, heroin, to an undercover police officer in the City of Lynn.
- 23. During the arrest described in the immediately preceding paragraph, you sent one or more text messages to Boyfriend's mobile telephone requesting that he obtain illegal narcotics for you.
- 24. During the arrest described above in Paragraph 20, you telephoned Boyfriend on his mobile telephone and spoke with one of the arresting Lynn police officers.

GROUNDS FOR DISCIPLINE

- A. Your conduct as alleged warrants disciplinary action by the Board against your registration to practice as a Pharmacy Technician pursuant to G.L. c. 112, § 42A.
- B. Your conduct as alleged warrants disciplinary action by the Board against your registration to practice as a Pharmacy Technician pursuant to Board Regulation 247 CMR 8.02 (1)(a)(3) for failing to meet the requirement for registration as a Pharmacy Technician that you be of good moral character.
- C. Your conduct as alleged warrants disciplinary action by the Board against your registration to practice as a Pharmacy Technician pursuant to Board Regulation 247 CMR 8.02 (1)(a)(4) for failing to meet the requirement for registration as a Pharmacy Technician that you have not been convicted of a drug related felony or admitted to sufficient facts to warrant such a finding.
- D. Your conduct as alleged warrants disciplinary action by the Board against your ability to act and be designated as a Pharmacy Technician Trainee pursuant to Board Regulation 247 CMR 8.03 (1)(c) for failing to meet the requirement for Pharmacy Technician Trainees that you be of good moral character.
- E. Your conduct as alleged warrants disciplinary action by the Board against your ability to act and be designated as a Pharmacy Technician Trainee pursuant to Board Regulation 247 CMR 8.03 (1)(d) for failing to meet the requirement for

- Pharmacy Technician Trainees that you have not been convicted of a drug related felony or admitted to sufficient facts to warrant such a finding.
- F. Your conduct as alleged warrants disciplinary action by the Board against your ability to act and be designated as a Pharmacy Technician Trainee pursuant to Board Regulation 247 CMR 8.03 (3) for failing to act and be designated as a Pharmacy Technician Trainee for not more than one thousand hours, unless an extension is granted by the Board.
- G. Your conduct as alleged warrants disciplinary action by the Board against your registration to practice as a Pharmacy Technician pursuant to Board Regulation 247 CMR 10.03, including, but not limited to the following Grounds for Discipline:
 - a. 247 CMR 10.03 (1)(a) for violating any of the duties and standards set out in Board regulations or any rule or written policy adopted by the Board;
 - b. 247 CMR 10.03 (1)(b) for violating any provision of G.L. c. 112, §§ 24 through 42A or any provision of state or federal statutes or rules and regulations promulgated thereunder;
 - c. 247 CMR 10.03 (1)(e) for engaging in misconduct in the practice of the profession;
 - d. 247 CMR 10.03 (1)(f) for engaging in practice beyond the authorized scope of a Pharmacy Technician;
 - e. 247 CMR 10.03 (1)(h) for engaging in abuse or illegal use of prescription drugs or controlled substances;
 - f. 247 CMR 10.03 (1)(k) for engaging in conduct that has the capacity or potential to place the public health, safety or welfare at risk;
 - g. 247 CMR 10.03 (1)(1) for engaging in conduct that has the capacity to or potential to deceive or defraud;
 - h. 247 CMR 10.03 (1)(n) for admitting to sufficient facts to warrant a finding of guilty of any crime;
 - i. 247 CMR 10.03 (1)(p) for providing false information on an application for licensure;
 - j. 247 CMR 10.03 (1)(q) for failing without cause, to cooperate with any request by the Board to appear before it or provide requested information; failing to respond to a Board subpoena or failing to furnish to the Board,

- its investigators or representatives with records, documents, information or testimony to which the Board is legally entitled;
- k. 247 CMR 10.03 (1)(r) for engaging in conduct that demonstrates a lack of good moral character;
- 1. 247 CMR 10.03 (1)(u) for engaging in conduct which undermines public confidence in the integrity of the profession;
- m. 247 CMR 10.03 (1)(v) for committing an act that violates recognized standards of pharmacy practice;
- n. 247 CMR 10.03 (1)(w) for failing to comply with recognized ethical standards of the profession, including, but not limited to, the standards of practice set forth in 247 CMR 9.01: Code of Conduct for Registered Pharmacists, Pharmacles and Pharmacy Departments;
- o. 247 CMR 10.03 (1)(x) for violation of G.L. c. 94C or any rules or regulations promulgated thereunder; and
- p. 247 CMR 10.03 (1)(aa) for failing to report to the Board, in writing, within thirty (30) days, any pending criminal charge or conviction, as defined in 247 CMR 10.02, of a registrant or licensee, in Massachusetts or any other jurisdiction.
- H. Your conduct as alleged warrants disciplinary action by the Board against your registration to practice as a Pharmacy Technician pursuant to G.L. c. 112, § 61 for deceit, malpractice, and gross misconduct in the practice of the profession or for any offense against the laws of the Commonwealth relating thereto.
- Your conduct as alleged also constitutes unprofessional conduct and conduct which undermines public confidence in the integrity of the profession. Sugarman v. Board of Registration in Medicine, 422 Mass. 338, 342 (1996); Kvitka v. Board of Registration in Medicine, 407 Mass. 140, cert. denied, 498 U.S. 823 (1990); Raymond v. Board of Registration in Medicine, 387 Mass. 708, 713 (1982).
- J. Your failure to give immediate written notification to the Board of a change of address, to apply for an amended license and to advise the Board, in writing, of your current mailing address warrants disciplinary action by the Board against your registration to practice as a Pharmacy Technician pursuant to G.L. c. 112, § 24F.
- K. Your failure to notify the Board in writing of a change of mailing address or name within ten (10) days of such change(s) warrants disciplinary action by the Board against your registration to practice as a Pharmacy Technician pursuant to 247 CMR 8.07 (3)(a).

You have a right to an adjudicatory hearing ("hearing") on the allegations contained in the Order to Show Cause before the Board determines whether to suspend, revoke, or impose other discipline against your license. G.L. c. 112, § 61. Your right to a hearing may be claimed by submitting a written request for a hearing within twenty-one (21) days of receipt of this Order to Show Cause. You must also submit an Answer to this Order to Show Cause in accordance with 801 CMR 1.01(6)(d) within twenty-one (21) days of receipt of this Order to Show Cause. The Board will give you prior written notice of the time and place of the hearing following receipt of a written request for a hearing.

Hearings shall be conducted in accordance with the State Administrative Procedure Act, G.L. c. 30A, §§ 10 and 11, and the Standard Adjudicatory Rules of Practice and Procedure, 801 CMR 1.01 and 1.03, under which you are granted certain rights including, but not limited to, the rights: to a hearing, to secure legal counsel or another representative to represent your interests, to call and examine witnesses, to cross-examine witnesses who testify against you, to testify on your own behalf, to introduce evidence and to make arguments in support of your position.

The Board will make an audio recording of any hearing conducted in the captioned matter. In the event that you wish to appeal a final decision of the Board, it is incumbent on you to supply a reviewing court with a "proper record" of the proceeding, which may include a written transcript. New Bedford Gas and Light Co. v. Board of Assessors of Dartmouth, 368 Mass. 745, 749-750 (1975). Upon request, the Board will make available a copy of the audio recording of the proceeding at your own expense. Pursuant to 801 CMR 1.01(10)(i)(1), upon motion, you "may be allowed to provide a public stenographer to transcribe the proceedings at [your] own expense upon terms ordered by the Presiding Officer." Those terms may include a requirement that any copy of the transcript produced must be sent immediately upon completion, and on an ongoing basis, directly to the Presiding Officer by the stenographer or transcription service. The transcript will be made available to the Prosecutor representing the Board. Please note that the administrative record of the proceedings, including, but not limited to, the written transcript of the hearing, is a public record and subject to the provisions of G.L. c. 4, § 7 and G.L. c. 66, § 10.

Your failure to submit a written request for a hearing within twenty-one (21) days of receipt of this Order to Show Cause shall constitute a waiver of the right to a hearing on the allegations herein and on any Board disciplinary action. Your failure to submit an Answer to the Order to Show Cause within twenty-one (21) days of receipt of the Order to Show Cause shall result in the entry of default in the captioned matter.

Notwithstanding the earlier filing of an Answer and/or request for a hearing, your failure to respond to notices or correspondence, your failure to appear for any scheduled status conference, pre-hearing conference or hearing dates, or your failure to otherwise defend this action shall result in the entry of default.

If you are defaulted, the Board may enter a Final Decision and Order that assumes the truth of the allegations in this Order to Show Cause, and may revoke, suspend, or take other disciplinary action against your registration to practice as a Pharmacy Technician in the Commonwealth of Massachusetts, including any right to renew your license.

Your Answer to the Order to Show Cause and your written request for a hearing must be filed with Patricia M. Blackburn, Prosecuting Counsel, at the following address:

Patricia M. Blackburn, Esq. Prosecuting Counsel Department of Public Health Office of the General Counsel 239 Causeway Street, 5th Floor Boston, MA 02114

You or your representative may examine Board records relative to this case prior to the date of the hearing during regular business hours at the office of the Prosecuting Counsel. If you elect to undertake such an examination, please contact Prosecuting Counsel in advance at (617) 973-0841 to schedule a time that is mutually convenient.

BOARD OF REGISTRATION IN PHARMACY Patrick M. Gannon, R.Ph., MS, FABC

President

Patricia M. Blackburn, Esq.

Prosecuting Counsel

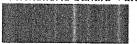
Department of Public Health

Date: October <u>19</u>, 2015

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Order to Show Cause, with accompanying cover letter and Certificate of Service, was served upon the Respondent, Alexandria Sahara Valdez, at the following address of record:

Alexandria Sahara Valdez



by first class mail, postage prepaid, and by Certified Mail No. 70091680000115202976.

This 19th day of October, 2015.

Patricia M. Blackburn, Esq.

Prosecuting Counsel