

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY

BOARD OF REGISTRATION
IN PHARMACY

In the Matter of)
Alla Stepanets)
PH26114)
Expires 12/31/2020)

PHA-2019-0021

CONSENT AGREEMENT FOR PROBATION

The Massachusetts Board of Registration in Pharmacy (“Board”) and Alla Stepanets (“Licensee”), PH26114, do hereby stipulate and agree that the following information shall be entered into and become a permanent part of the Licensee’s record maintained by the Board:

1. Licensee acknowledges the Board opened a complaint against her Massachusetts pharmacist license related to the conduct set forth in Paragraph 2, identified as Docket No. PHA-2019-0019.¹
2. The Board and Licensee acknowledge and agree to the following facts:
 - a. From approximately January 2008 until October 2012, Licensee worked as a pharmacist at New England Compounding Center (“NECC”), a pharmacy located in Framingham, Massachusetts.
 - b. On or about December 13, 2018, in the matter of *United States of America v. Alla Stepanets*, Case Number 1:14CR10363-8 (D. Mass), Licensee was convicted of strict liability misdemeanors with respect to conduct she engaged in while practicing as a pharmacist at NECC. Specifically, Licensee was convicted on six counts of violating the federal Food, Drug & Cosmetics Act.
 - c. As a result, on or about May 7, 2019, Licensee was sentenced to one year of probation which she successfully completed.

¹ The term “license” applies to both a current license and the right to renew an expired license.

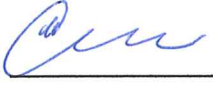
3. The Board and Licensee acknowledge and agree that the facts described in Paragraph 2 warrant disciplinary action by the Board under M.G.L. c. 112, §§ 42A & 61 and 247 CMR 10.03(1)(b), (k), (l), (n), (u), (v), (w) & (x).
4. Licensee agrees that her pharmacist license shall be placed on disciplinary PROBATION for at least thirty (30) days (“Disciplinary Probationary Period”), commencing with the date on which the Board signs this Agreement (“Effective Date”).
5. During the Disciplinary Probationary Period, the Licensee agrees that she shall comply in all material respects with all laws and regulations governing the practice of pharmacy and the United States Pharmacopeia.
6. During the Disciplinary Probationary Period, the Licensee further agrees to the following:
 - a. Licensee will not practice as a pharmacist until she achieves a passing score on the MPJE examination.
 - b. Licensee may not serve as Manager of Record of any pharmacy.
 - c. Licensee may not supervise pharmacy interns.
 - d. Licensee may not engage in sterile compounding, without express, written approval from the Board.
7. Upon Licensee’s submission of a passing score on the MPJE, but no sooner than 30 days after the Effective Date, the Disciplinary Probationary Period will be automatically converted to a Non-Disciplinary Stayed Probation (“Stayed Probationary Period”).
8. During the Non-Disciplinary Stayed Probationary Period, the Licensee further agrees to the following:
 - a. Licensee may not serve as Manager of Record of any pharmacy.
 - b. Licensee may not supervise pharmacy interns.
 - c. Licensee may not engage in sterile compounding, without express, written approval from the Board.

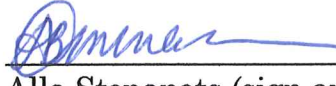
9. The Board agrees that in return for Licensee's execution and successful compliance with the requirements of this Agreement it will not prosecute the Complaint.
10. If the Licensee has complied to the Board's satisfaction with all the requirements contained in paragraphs 6 and 8 of this Agreement, the Non-Disciplinary Probationary Period will terminate one (1) year after Licensee submits documentation demonstrating she achieved a passing score on the MPJE examination.
11. If the Licensee does not materially comply with each requirement of this Agreement, or if the Board opens a Subsequent Complaint² during the Probationary Period or the Stayed Probationary Period, the Licensee agrees to the following:
 - a. The Board may upon written notice to the Licensee, as warranted to protect the public health, safety, or welfare:
 - i. EXTEND the Probationary Period; and/or
 - ii. MODIFY the Probation Agreement requirements; and/or
 - iii. IMMEDIATELY SUSPEND the Licensee's pharmacist license.
 - b. If the Board suspends the Licensee's pharmacy license pursuant to Paragraph 11(a)(iii), the suspension shall remain in effect until:
 - i. the Board provides Licensee written notice that the Probationary Period is to be resumed and under what terms; or
 - ii. the Board and Licensee sign a subsequent agreement; or
 - iii. the Board issues a written final decision and order following adjudication of the allegations (1) of

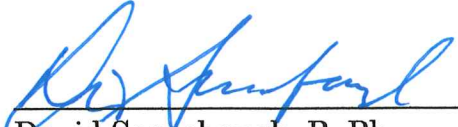
² The term "Subsequent Complaint" applies to a complaint opened after the Effective Date concerning acts, omissions, or events occurring after the Effective Date, which (1) alleges that the Licensee engaged in conduct that violates Board statutes or regulations, and (2) is substantiated by evidence, as determined following the complaint investigation during which the Licensee shall have an opportunity to respond.

noncompliance with this Agreement, and/ or (2) contained in the Subsequent Complaint.

12. Licensee agrees that if the Board suspends her pharmacist license in accordance with Paragraph 11, she will immediately return her current Massachusetts pharmacist license to the Board, by hand or certified mail. Licensee further agrees that upon said suspension, she will no longer be authorized to practice as a pharmacist in the Commonwealth of Massachusetts and shall not in any way represent herself as a pharmacist until such time as the Board reinstates her pharmacist license or right to renew such license.
13. Licensee understands that she has a right to formal adjudicatory hearing concerning the Complaint and that during said adjudication she would possess the right to confront and cross-examine witnesses, to call witnesses, to present evidence, to testify on her own behalf, to contest the allegations, to present oral argument, to appeal to the courts, and all other rights as set forth in the Massachusetts Administrative Procedures Act, M.G.L. c. 30A, and the Standard Adjudicatory Rules of Practice and Procedure, 801 CMR 1.01 et seq. The Licensee further understands that by executing this Agreement she is knowingly and voluntarily waiving her right to a formal adjudication of the Complaints.
14. The Licensee acknowledges that she has been represented by legal counsel in connection with the Complaint and this Agreement.
15. The Licensee acknowledges that after the Effective Date, the Agreement constitutes a public record of disciplinary action by the Board. The Board may forward a copy of this Agreement to other licensing boards, law enforcement entities, and other individuals or entities as required or permitted by law.
16. The Licensee certifies that she has read this Agreement. The Licensee understands and agrees that entering into this Agreement is a voluntary and final act and not subject to reconsideration, appeal or judicial review.

 04/20/21
Witness (sign and date)

 04/20/2021
Alla Stepanets (sign and date)

 5/11/2021
David Sencabaugh, R. Ph.
Executive Director
Board of Registration in Pharmacy

May 13, 2021
Effective Date of Probation Agreement

Fully Signed Agreement Sent to Licensee on May 13, 2021 by
Certified
Mail No. 7019 0140 0000 7224 4344