COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY	BOARD OF REGISTRATION IN PHARMACY
In the Matter of) CHRISTINE M. WILLIAMS)	Docket No. PH-PT -07-090
PH-PT Registration No. 5874) License expires 4/18/08)	

VOLUNTARY SURRENDER AGREEMENT

The Board of Registration in Pharmacy ("Board") and Christine Williams ("Registrant"), a pharmacy technician (Registration No. 5874), do hereby stipulate and agree that the following information shall be entered into and become a permanent part of the file of Registrant that is maintained by the Board:

- 1. The Registrant hereby admits having developed an Redacted in or around 2006;
- 2. The Registrant hereby admits diverting controlled substances from her employer, Brooks Pharmacy, in 2006 and through March of 2007, in a manner substantially consistent with the allegations set forth in ¶s 4-6 of the Order to Show Cause dated August 1, 2007 issued on Docket No. PH-PT -07-090;
- 3. The Registrant further acknowledges having admitted on August 27, 2007, that sufficient facts existed to allow the Worcester District Court to make a finding of guilty on a criminal charge of *Larceny of Property (under \$250)* stemming from her unauthorized removal of controlled substances from Brooks Pharmacy. The Court directed that the matter be *Continued Without a Finding* until August 26, 2008 and that the Registrant be supervised by the Court's Probation Department through that date. (Worcester District Court Dkt. No. Redacted);
- 4. The Registrant admits that her conduct in 2006 and 2007 and the continuance without a finding of the above-referenced criminal matter violate the statutes, regulations, and case law set forth in \$\\$10-12\$ of the Order to Show Cause;
- The Registrant, hereby voluntarily SURRENDERS to the Board her right and authorization to practice as a pharmacy technician in the Commonwealth of Massachusetts (Registration No. 5874) consistent with her admission that sufficient facts

exist to justify a finding of guilt in the Worcester District Court criminal matter and in light of her admission of violation of statutes, regulations, and case law with respect to the conduct set forth in ¶s 4-6 of the Order to Show Cause. The Registrant additionally and voluntarily herewith surrenders physical custody of her pharmacy technician's license.

- 6. The Registrant offers this Surrender of her Pharmacy Technician's license with the understanding that the Surrender shall be for an indefinite period and shall continue until the Board, in its discretion, determines that the Registrant is eligible to petition for the reinstatement of her license. The Board and the Registrant agree that the Board will not review and the Registrant may not file any petition for registration with the Board during the five (5) year period following the date of execution of this Agreement by the Registrant. If at any time in the future Registrant seeks licensure by the Board, the Board may require the Registrant to complete certain requirements and meet specific terms and conditions prior to filing any petition for registration, including but not limited to, requirements relating to monitoring and practice limitation conditions on her license, including but not limited to, probationary status and participation in substance abuse treatment programs. The Registrant acknowledges that she would be required to meet all licensure requirements in effect at the time of any petition for registration.
- 7. This Agreement and its contents shall be incorporated into the records maintained by the Board. This Agreement is a public record subject to disclosure to the public and equivalent state licensing boards.
- 8. The Board agrees that in return for Registrant's execution of this Agreement, the Board will not advance the prosecution of the conduct referenced in the Order to Show Cause issued on matter PH-PT -07-090. Any and all other rights of the Board to take action within the scope of its authority are expressly reserved.
- 9. The Registrant understands and agrees that the decision to enter into this Agreement and to accept the terms and conditions herein described is a final act and is not subject to reconsideration or judicial review.
- 10. The Registrant states that she has used legal counsel in connection with her decision to enter into this Agreement.
- 11. The Registrant certifies that she has read this document entitled "Voluntary Surrender Agreement." The Registrant understands that, by executing this Agreement, she is waiving her right to a formal hearing regarding ¶ 5 of the Order to Show Cause issued on matter PH-PT -07-090 at which she would possess the rights 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 court in the event of an adverse ruling, and all other rights set forth in G.L. c. 30A and 801 CMR 1.01 et seq. Registrant states that she further understands that in executing this document entitled

"Voluntary Surrender Agreement", she is knowingly and voluntarily waiving her right to a formal hearing and to all of the above listed rights.

Witness (sign name)

Witness (print name)

Christine Williams

4-10-08 date

Board of Registration in Pharmacy

By:

Sophia Pasedis, Pharm.D., R.Ph.

President