

COMMONWEALTH OF MASSACHUSETTS

FILED

SUFFOLK COUNTY

BOARD OF REGISTRATION IN  
PHARMACY

2013  
MAY 27  
2013

In the Matter of )  
Deliluz Gonzalez )  
PT License No. 7710 )  
REG. EXP. DATE: 9/30/14 )

Docket No. PHA-2013-0014

**CONSENT AGREEMENT FOR VOLUNTARY SURRENDER**

The Massachusetts Board of Registration in Pharmacy ("Board") and Deliluz Gonzalez ("Licensee"), a pharmacy technician registered by the Board, Registration No. PT7710, 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. The Licensee acknowledges that a complaint has been filed with the Board against her Massachusetts pharmacy technician registration ("registration") related to the conduct set forth in Paragraph 2, identified as Docket No. PHA-2013-0014 ("the Complaint").<sup>1</sup>
2. The Board and the Licensee acknowledge and agree to the following facts:
  - a. Licensee is not licensed or authorized to order or prescribe controlled substances.
  - b. On at least three occasions, Licensee contacted a pharmacy by telephone, represented herself to be acting on behalf of a physician, and placed a verbal order for Vicodin with intent that she obtain the Vicodin for her personal use.
  - c. Licensee provided false information to a pharmacy in order to obtain controlled substances.
  - d. Licensee did not have a legal or valid prescription for the Vicoden she obtained.

<sup>1</sup> The term "registration" applies to both a current registration and the right to renew an expired registration.

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3. The Board and Licensee acknowledge and agree that Licensee's conduct described in Paragraph 2 warrants disciplinary action by the Board under M.G.L. c. 112, § 61 and Board regulations at 247 CMR 10.06.
4. The Licensee agrees to SURRENDER her license and refrain from practicing as a Pharmacy Technician and from working in any pharmacy setting in Massachusetts, commencing with the date on which the Board signs this Agreement ("Effective Date").
5. The Licensee further agrees to immediately return her original Massachusetts pharmacy technician registration to the Board.
6. The Board agrees that in return for the Licensee's execution of this Agreement it will not prosecute the Complaint.
7. The Licensee understands that she has a right to formal adjudicatory hearing concerning the allegations against her 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, 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 Complaint.
8. The Licensee acknowledges that she has at all times free to seek and use legal counsel in connection with the Complaint and this Agreement.
9. 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.

10. The Licensee certifies that she has read this Agreement. The Licensee understands and agrees that entering into this Agreement is a final act and not subject to reconsideration, appeal or judicial review.

Charles Lane MM 09 12/14  
Witness (sign and date)

Deliluz Gonzalez 2/29/14  
Deliluz Gonzalez  
Licensee (sign and date)

David Sencabaugh  
David Sencabaugh  
Executive Director  
Board of Registration in Pharmacy

2-19-14  
Effective Date of Surrender Agreement

Fully Signed Agreement Sent to Licensee on 2/19/14 by  
Certified Mail No. 7010 1870 0002 2380 5417