

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY

BOARD OF REGISTRATION IN  
PHARMACY

In the Matter of  
**JUSTINE ALYSSA ANDERSON**  
License No. PT18418  
Expires March 11, 2017

Docket No. PHA-2015-0040

**CONSENT AGREEMENT FOR VOLUNTARY SURRENDER**

The Massachusetts Board of Registration in Pharmacy ("Board") and Justine Alyssa Anderson ("Licensee"), a pharmacy technician licensed by the Board, PT18418 ("License" or "registration"), 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:

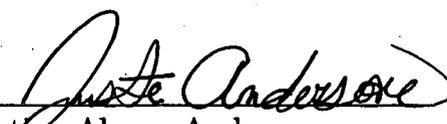
1. The Licensee acknowledges that the Board opened a complaint against her Massachusetts pharmacy technician License related to the conduct set forth in Paragraph 2, identified as Docket No. PHA-2015-0040 ("Complaint").<sup>1</sup>
2. The Board and Licensee acknowledge and agree to the following facts:
  - a. Between March 30, 2013 and January 5, 2015, Licensee was employed as a pharmacy technician at CVS Pharmacy #707 ("Pharmacy"), located at 500 Grafton Street in Worcester, Massachusetts.
  - b. On or about January 5, 2015, Licensee admitted to diverting approximately 217 tablets/units of Schedule II and IV controlled substances from the Pharmacy during her employment.
3. The Board and Licensee acknowledge and agree that Licensee's conduct described in Paragraph 2 constitutes a violation M.G.L. c. 94C, § 37 and 247 CMR 10.03(1)(x) and is grounds for discipline by the Board pursuant to M.G.L. c. 112, § 61 and 247 CMR 10.03(1)(r).
4. The Licensee agrees to SURRENDER her License for an indefinite period of time and refrain from practicing as a pharmacy technician and from working in any pharmacy-related setting in Massachusetts, commencing with the date on which the Board signs this Agreement ("Effective Date"). The Licensee

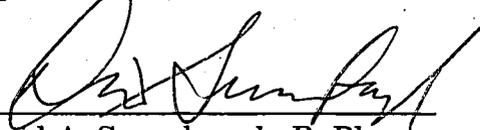
<sup>1</sup> The term "License", "license" and "registration" applies to both a current license and the right to renew an expired license.

further agrees to immediately return her original Massachusetts pharmacy technician registration to the Board.

5. The Board agrees that in return for the Licensee's execution and successful compliance with all the requirements of this Agreement, the Board will not prosecute the Complaint.
6. The 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 Complaint.
7. The Licensee acknowledges that she has been at all times free to seek and use legal counsel in connection with the Complaint and this Agreement.
8. The Licensee acknowledges that after the Effective Date, the Agreement constitutes a public record of disciplinary action by the Board subject to the Commonwealth of Massachusetts' Public Records Law, M.G.L. c. 4, §7. 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.
9. 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.

  
Witness (sign and date) 11-20-15

  
Justine Alyssa Anderson  
(sign and date) 11-20-2015

  
David A. Sencabaugh, R. Ph.  
Executive Director  
Board of Registration in Pharmacy

12/14/15

Effective Date of Agreement

Fully Signed Agreement Sent to Registrant on 12/18/15 by

Certified Mail No. 7015 3010 0001 7079 9789