COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY

BOARD OF REGISTRATION IN PHARMACY

In the Matter of Meghan Kathleen Donlon PT License No. 15275 Expiration Date: 12/16/14

PHA-2013-0157

CONSENT AGREEMENT FOR VOLUNTARY SURRENDER

The Massachusetts Board of Registration in Pharmacy ("Board") and Meghan Kathleen Donlon ("Licensee"), a pharmacy technician registered by the Board, Registration No. PT15275, 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-2013-0157 ("the Complaint").
- 2. The Licensee acknowledges and admits that she divered at leat three Xanax tablets from the pharmacy where she was employed and that she did not have a legitimate prescription for said Xanax tablets.
- 3. The Board and Licensee acknowledge and agree that Licensee's conduct described in Paragraph 2 is a violation M.G.L. c. 94C, § 34 and 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 pharmacy technician registration for an indefinite period of time commencing with the date on which the Board signs this Agreement ("Effective Date").
- 5. The Licensee agrees that she will not practice as a pharmacy technician or work in any pharmacy related setting in Massachusetts from the Effective Date unless and until the Board reinstates her registration².

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

² The Licensee understands that practice as a registered pharmacy technician includes, but is not limited to,

seeking and/or accepting a paid or voluntary position as a registered pharmacy technician, or a paid or voluntary position requiring that the applicant hold a current pharmacy technician registration. The Licensee further understands that if she accepts a voluntary or paid position as a registered pharmacist/pharmacy technician, or engages in any practice of pharmacy after the Effective Date and before the Board formally

- 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, 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.
- 8. 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.
- 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.

Witness (sign and date)

Meghan Kathleen Donlon

Licensee (sign and date)

Witness (print name)

David Sencabaugh, R. Ph.

Executive Director

Board of Registration in Pharmacy

Effective Date of Surrender Agreement

Fully Signed Agreement Sent to Licensee on Mach 21, 21/4 by Certified Mail No. 7610 1870 000 2 2380 99 27