

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY

BOARD OF REGISTRATION IN
PHARMACY

_____)
In the Matter of)
Stephen Ivanoski)
License No. PI156838)
Expired November 5, 2015)
_____)

Docket No. PHA-2013-0141

CONSENT AGREEMENT FOR VOLUNTARY SURRENDER

The Massachusetts Board of Registration in Pharmacy ("Board") and Stephen Ivanoski ("Licensee"), a pharmacy intern licensed by the Board, PI156838 ("Licensee")¹ 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:

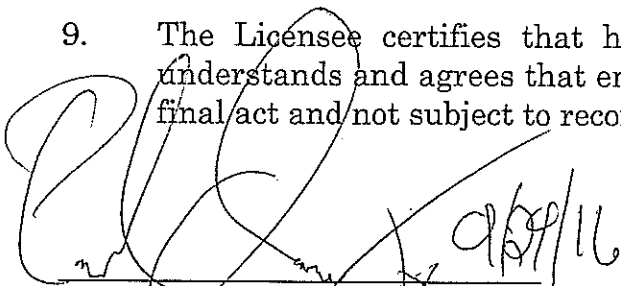
1. The Licensee acknowledges that the Board opened a complaint against his License related to the conduct set forth in Paragraph 2, identified as Docket No. PHA-2013-0141 ("Complaint").
2. The Board and Licensee acknowledge and agree to the following facts:
 - a. Between December 2009 and August 2013, Licensee was employed as a pharmacy intern at CVS Pharmacy #1876, located at 900 Commonwealth Avenue in Boston, Massachusetts ("Pharmacy").
 - b. On or about July 24, 2013, the Pharmacy's surveillance camera recorded Licensee taking pills from the bottle of Oxycodone that he removed from a pre-filled prescription bag.
 - c. On or about August 6, 2013, Licensee admitted to diverting a schedule II controlled substance on several occasions.
 - d. Licensee did not have a valid prescription for these controlled substances.

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

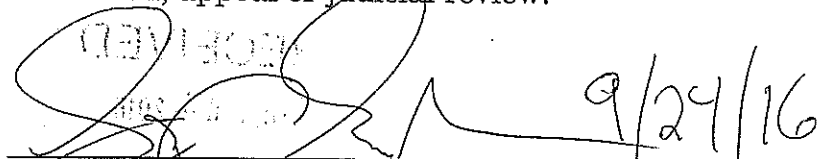
Stephen Ivanoski
PI 156838
PHA-2013-0141

3. The Board and Licensee acknowledge and agree that Licensee's conduct described in Paragraph 2 constitutes violations of M.G.L. c. 94C, § 34 and 247 CMR 10.03(1)(e), (h), (x), and is grounds for discipline by the Board pursuant to M.G.L. c. 112, §§ 42A and 61 and 247 CMR 10.06.
4. The Licensee agrees to **SURRENDER** his License effective from June 1 through November 5, 2015.
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 he has the right to a formal adjudicatory hearing concerning the Complaint and that during said adjudication he would possess the right to confront and cross-examine witnesses, call witnesses, present evidence, testify on his own behalf, contest the allegations, present oral argument, 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 he is knowingly and voluntarily waiving his right to a formal adjudication of the Complaint.
7. The Licensee acknowledges that he 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 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.

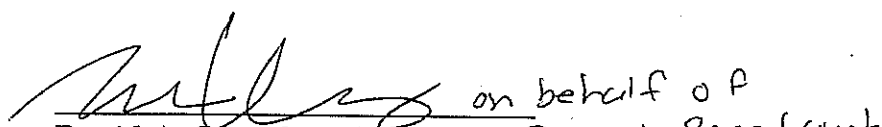
9. The Licensee certifies that he has read this Agreement. The Licensee understands and agrees that entering into this Agreement is a voluntary and final act and not subject to reconsideration, appeal or judicial review.



Witness (sign and date) 9/29/16



Stephen Ivanoski (sign and date) 9/29/16



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

10/4/16
Effective Date of Agreement

Fully Signed Agreement Sent to Licensee on October 4, 2016 by
Certified Mail No. 7016 1370 0001 4117 6216