

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

BOARD OF REGISTRATION
IN PHARMACY

In the Matter of
SUSAN ANHORN
Pharmacy Technician No. 11787
Expires 10/19/2012

DOCKET NO. PHA-2012-0121

VOLUNTARY SURRENDER AGREEMENT

The Massachusetts Board of Registration in Pharmacy ("Board") and Susan Anhorn ("Licensee"), a pharmacy technician licensed by the Board, Registration No. PT 11787, 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"¹) related to the conduct set forth in paragraph 2, identified as Docket No. PHA-2012-0121 ("the Complaint").
2. The Licensee acknowledges that if the matter went to a hearing, the Board could find that there is sufficient evidence that she diverted various controlled substances, and failed to conduct herself professionally and in conformance with the standards of practice for a pharmacy technician. The Licensee acknowledges that her conduct constitutes failure to comply with the Board's regulations at 247 Code of Massachusetts Regulations ("CMR") 2.00 et. seq. and 247 CMR 10.03 (1) and warrants disciplinary action by the Board under Massachusetts General Laws ("G.L.") Chapter 112, section 61 and Board regulations at 247 CMR 10.06, Disciplinary Actions.
3. The Licensee agrees to SURRENDER her pharmacy technician registration together with any right to renew, to the Board, commencing with the date on which the Board signs this Agreement ("Effective Date").
4. The Licensee agrees that she will not practice as a registered pharmacy technician in Massachusetts from the Effective Date unless and until the Board reinstates her registration.
5. The Licensee agrees to surrender any current license or registration to practice as a pharmacy technician issued by any other jurisdiction from the effective date and will not

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

apply or attempt to gain licensure as a pharmacy technician or to renew any pharmacy technician license previously issued by any other jurisdiction.

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 been represented by 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.

[Signature] April 5, 2013
Witness (sign and date)
Neil J. DePaul

Witness (print name)

[Signature] April 5, 2013
Susan Anhorn
Licensee (sign and date)

[Signature]
Margy Cittadino, Asst. Director
Board of Registration in Pharmacy

April 5, 2013
Effective Date of Surrender Agreement

Fully Signed Agreement Sent to Licensee Atty on: 4/5/13 by Certified Mail
No. 7012 0470 0001 3526 7070