

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY

BOARD OF
REGISTRATION IN
PHARMACY

In the Matter of)
Susan Vanessa Mendoza) PHA-2013-0108
 PT License No. 16180)
 Expiration Date: November 14, 2015)

CONSENT AGREEMENT FOR VOLUNTARY SURRENDER

The Massachusetts Board of Registration in Pharmacy ("Board") and Susan Vanessa Mendoza ("Licensee"), a pharmacy technician registered by the Board, Registration No. PT16180, 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 related to the conduct set forth in Paragraph 2, identified as Docket No. PHA-2013-0108 ("the Complaint").¹
2. The Licensee acknowledges and admits that while employed as a pharmacy technician at Walgreens Pharmacy between October 1, 2012 and March 14, 2013, she diverted multiple controlled substances, including one bottle of injectable testosterone, approximately 12 – 13 bottles of Xanax, and approximately 250 – 300 tablets of Vicodin.
3. The Licensee acknowledges that the conduct described in Paragraph 2 and warrants disciplinary action by the Board under M.G.L. c. 112, § 61 and Board regulations at 247 CMR 10.03.
4. The Licensee agrees to SURRENDER her pharmacy technician 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"). The Licensee further agrees to immediately return her original Massachusetts pharmacy technician registration to the Board.

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

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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.

Jaylene Davis 3/27/15 Witness (sign and date)
Susan Vanessa Mendoza 3/27/14 Licensee (sign and date)

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

4/4/14
Effective Date of Surrender Agreement

Fully Signed Agreement Sent to Licensee on 4/4/14 by
Certified Mail No. 7012 3460 0003 3582 4596

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