

SUFFOLK COUNTY

In the Matter of)
Thao Thuong Pham)
License Number PH238708)
Expiration 12.31.24)
)
)

CONSENT AGREEMENT FOR REPRIMAND

1. The Respondent acknowledges that the Board opened a Complaint against her Massachusetts license related to the conduct set forth in Paragraph 2 below, identified as Docket Number PHA-2023-0084 (Complaint).
2. The Respondent and the Board agree to resolve this Complaint without making any admissions or findings and without proceeding to a formal adjudicatory hearing. The Complaint alleges that the Respondent, who is licensed as a Pharmacist in California, was subject to discipline there regarding improper compounding.
3. The Board and Respondent acknowledge and agree that based upon the information described in Paragraph 2 above, the Board could find the Respondent in violation of Title 247 of the Code of Massachusetts Regulations (CMR) Section 10.03(1)(t), warranting disciplinary action by the Board.
4. The Respondent agrees that the Board shall impose a REPRIMAND on her license based on the facts described in Paragraph 2 above, effective as of the date on which the Board signs this Agreement (Effective Date).
5. The Board agrees that in return for the Respondent's execution and successful compliance with all the requirements of this Agreement, the Board will not prosecute the Complaint.
6. The Respondent 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, MGL Chapter

30A, and the Standard Adjudicatory Rules of Practice and Procedure, 801 CMR Section 1.01, *et seq.* The Respondent further understands that by executing this Agreement, she is knowingly and voluntarily waiving her right to a formal adjudication of the Complaint.

7. The Respondent acknowledges that she has been at all times represented by Counsel or otherwise free to seek and use legal counsel in connection with the Complaint and this Agreement.
8. The Respondent 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, MGL Chapter 4, Section 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 Respondent understands and agrees that entering into this Agreement is a voluntary and final act and not subject to reconsideration, appeal, or judicial review.
10. The Respondent certifies that she has read this Agreement.

2/22/24

Date



Thao Thuong Pham (signature)



David Sencabaugh, R. Ph.

Executive Director

Board of Registration in Pharmacy

2/23/24

Effective Date of Reprimand Agreement

Fully Signed Agreement Sent to Licensee on 3 / 1 / 2024 by Certified Mail
No. 7022 2410 0001 6855 3347